

City of Roanoke Redevelopment and Housing Authority

2026 Annual Plan

Agency Plan 2025 — 2029



CITY of ROANOKE REDEVELOPMENT
and HOUSING AUTHORITY

PARTNERS IN PROGRESS

DRAFT

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NOTICE OF PUBLIC HEARING

The City of Roanoke Redevelopment and Housing Authority (RRHA) will conduct a Public Hearing on the update to the 2025-2029 Agency Plan and the Capital Fund Program Five-Year Action Plan on May 18, 2026 at 3:00 p.m. at 2624 Salem Turnpike, NW, Roanoke, Virginia 24017.

The purpose of the hearing is: 1) to present the 2026 Annual Plan update to the 2025-2029 Agency Plan and receive public comments. The Annual Plan provides details about the agency’s policies, programs and services, residents’ concerns and needs, and plans for operations for the next five years; and 2) to present the Capital Fund Program Five-Year Action Plan and receive public comments. The Action Plan provides details about the agency’s plans for capital improvements in public housing for the next five years.

Draft copies of the 2026 Annual Plan update to the 2025-2029 Agency Plan and the 2026 Capital Fund Program Five-Year Action Plan will be available for review beginning April 1, 2026 on the RRHA website at www.rkehousing.org and at the following locations Monday through Friday from 8:30 a.m. to 5:00 p.m. In addition to the Public Hearing, comments can be directed to dbustamante@rkehousing.org.

RRHA Administrative Offices
2624 Salem Turnpike, NW

Lansdowne Park
2624 Salem Turnpike, NW

Morningside Manor
1020 13th Street, SE

Villages at Lincoln
1801 Dunbar Street, NW

Hunt Manor
802 Hunt Avenue, NW

Indian Rock Village
2034 Indian Village Lane, SE

Melrose Towers
3038 Melrose Avenue, NW

Jamestown Place
1533 Pike Lane

Bluestone Park
2617 Bluestone Avenue, NE



CITY OF ROANOKE REDEVELOPMENT AND HOUSING AUTHORITY

David Bustamante
Executive Director
EEO/AA

As set forth in the Americans with Disabilities Act (ADA) of 1990 and Section 504 of the Rehabilitation Act of 1973, RRHA does not discriminate on the basis of disability, and is willing to assist citizens with special needs. If you have a hearing or vision disability and wish to attend any RRHA public meeting, please contact us seven (7) days prior to meeting date at (540) 983-9286 or City of Roanoke Redevelopment and Housing Authority, 2624 Salem Turnpike, NW, Roanoke, VA 24017.

Date of Notice: March 29, 2026



INTERIM AD DRAFT

This is the proof of your ad scheduled to run in **The Roanoke Times** on the dates indicated below. If changes are needed, please contact us prior to deadline at help@column.us

Notice ID: Evpl4q5Qposo9HGgHt2p | **Proof Updated: Mar. 26, 2026 at 03:14pm EDT**
Notice Name: 2026 Agency Plan - Public Hearing

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FILER	FILING FOR
Meghan Castaneda mcastaneda@rkehousing.org (540) 983-9283	The Roanoke Times

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Villages at Lincoln 1801 Dunbar Street, NW	Hunt Manor 802 Hunt Avenue, NW	Indian Rock Village 2034 Indian Village Lane, SE
Melrose Towers 3038 Melrose Avenue, NW	Jamestown Place 1533 Pike Lane	Bluestone Park 2617 Bluestone Avenue, NE



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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: 9/30/2027
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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. They also inform 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-, very low-, 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 **do not** need to submit this form. Note: PHAs with zero public housing units must continue to comply with the PHA Plan requirements until they closeout their Section 9 programs (ACC termination).

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers (HCVs) and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, SEMAP for PHAs that only administer tenant-based assistance and/or project-based assistance, 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 HCVs combined and is not PHAS or SEMAP troubled.

A.	PHA Information.
A.1	<p> PHA Name: _____ PHA Code: _____ PHA Type: <input type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____ PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units _____ Number of Housing Choice Vouchers (HCVs) _____ Total Combined Units/Vouchers _____ </p> <p> PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Public Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below 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 and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans. </p>

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. Plan Elements

B.1 Revision of Existing PHA Plan Elements.

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

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

(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.

B.2 New Activities.

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

Y N

- Choice Neighborhoods Grants.
- 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 Rental Assistance or Project-Based Vouchers under RAD.
- Homeownership Program under Section 32, 9 or 8(Y)
- 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 applicable 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.

B.3

Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

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.
B.5	<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 type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C. Other Document and/or Certification Requirements.	
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(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.</p>

<p>C.2</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>C.3</p>	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.4</p>	<p>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.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>

C.5 Troubled PHA.

(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?

Y N N/A

(b) If yes, please describe:

Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section (24 CFR 903.4).

A.1 Include the full **PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and Number of HCVs, PHA Plan Submission Type,** and the **Public Availability of Information,** specific location(s) of all information relevant to the public hearing and proposed PHA Plan. Note: The number of HCV's should include all special purpose vouchers (e.g. Mainstream Vouchers, etc.) (24 CFR 903.23(e)).

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table (24 CFR 943.128(a)).

B. Plan Elements. All PHAs must complete this section.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no" (24 CFR 903.7).

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location (24 CFR 903.7(a)(2)(i)). Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy (24 CFR 903.7(a)(2)(ii)).

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2 (24 CFR 903.23(b)). Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR 903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements (24 CFR 903.7(b)). Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists (24 CFR 903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV (24 CFR 903.7(b)). Describe the unit assignment policies for public housing (24 CFR 903.7(b)).

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program and state the planned use for the resources (24 CFR 903.7(c)).

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies (24 CFR 903.7(d)).

Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA (24 CFR 903.7(e)).

Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants (24 CFR 903.7(f)).

Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or HCV homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval (24 CFR 903.7(k)).

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR 903.7(l)). Provide a description of: (1) Any programs relating to services and amenities provided or offered to assisted families; and (2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS (24 CFR 903.7(l)).

Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities (24 CFR 903.7(m)). Note: All coordination and activities must be consistent with federal civil rights obligations. A description of: (1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to survivors of domestic violence, dating violence, sexual assault, or stalking; (2) Any activities, services, or programs provided or offered by a PHA that helps survivors of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and (3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance survivor safety in assisted families (24 CFR 903.7(m)(5)).

Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing (24 CFR 903.7(n)).

Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory (24 CFR 903.7(q)).

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan (24 CFR 903.7(s)(2)(i)).

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan (24 CFR 903.7(s)(2)(ii)). For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH 2019-23(HA), successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2 (24 CFR 903.23(b)).

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

Choice Neighborhoods Grants. (1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Choice Neighborhoods Grants; and (2) A timetable for the submission of applications or proposals. The application and approval process for Choice Neighborhoods is a separate process. See guidance on HUD's website at: <https://www.hud.gov/cn> (Notice PIH 2011-47).

Modernization or Development (Conventional & Mixed-Finance). (1) A description of any Public Housing (including name, project number (if known) and unit count) for which the PHA will apply for modernization or development; and (2) A timetable for the submission of applications or proposals. The application and approval process for modernization or development is a separate process. (See 24 CFR part 905 and guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4).

Demolition and/or Disposition. With respect to public housing only, (1) describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) a timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/centers/sac/demo_dispo/ and 24 CFR 903.7(h).

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted, or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: (1) development name and number; (2) designation type; (3) application status; (4) date the designation was approved, submitted, or planned for submission, (5) the number of units affected and (6) expiration date of the designation of any HUD approved plan. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation (24 CFR 903.7(i)(c)).

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe (1) any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; (2) an analysis of the projects or buildings required to be converted under Section 33; and (3) a statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at the Special Applications Center (SAC) (<https://www.hud.gov/sac>) and 24 CFR 903.7(j).

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program (including Faircloth to RAD). Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. Note that all PHAs shall be required to provide the information listed in Attachment ID of Notice PIH 2019-23(HA) as a significant amendment or its successor notice. See additional guidance on HUD's website at: <https://www.hud.gov/RAD/library/notices>.

Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HCV homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval (24 CFR 903.7(k)).

Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty day notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. (See additional guidance on HUD's website at: Notice PIH-2021-35 (24 CFR 960.503) (24 CFR 903.7(b)).

Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency

may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2021-35. (24 CFR 960.505) (24 CFR 903.7(b))
NOTE: All activities must be consistent with civil rights laws – including ensuring that it does not have a disparate impact on protected class groups based on race, color, religion, national origin, sex (including sexual orientation), familial status, and disability.

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: Notice PIH 2009-21 and Notice PIH-2017-03 (24 CFR 903.7(e)).

Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 24 CFR 983.55(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations (including if PBV units are planned on any former or current public housing units or sites), and describe how project-basing would be consistent with the PHA Plan (24 CFR 903.7(b)(3), 24 CFR 903.7(r)).

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR 990.145(a)(1).

Other Capital Grant Programs (i.e., Capital Fund Lead Based Paint, Housing Related Hazards, At Risk/Receivership/Substandard/Troubled Program, and/or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the applicable Fiscal Year, provide a description of the activity in the space provided.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan (24 CFR 903.7(s)(1)).

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR 903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided (24 CFR 903.7(p)).

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations (24 CFR 903.13(c), 24 CFR 903.19).

C.2 Certification by State of 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. (24 CFR 903.15). **Note:** A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting 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*. 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. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of 24 CFR 5.150 et. seq., 24 CFR 903.7(o)(1), and 903.15.

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public (24 CFR 903.23(b)).

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A" (24 CFR 903.9).

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 5.64 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. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

Civil Rights Certification
(Qualified PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires: 09/30/2027

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as "the Plan," of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning _____, in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the submission of the Plan and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), Title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of all HUD programs. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, the Violence Against Women Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of all HUD programs. The PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR § 5.150 et seq., 24 CFR § 903.7(o), and 24 CFR § 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR § 5.151). Pursuant to 24 CFR § 903.15(c)(2), a PHA's policies are designed to reduce the concentration of tenants and other assisted persons by race, national origin, and disability. PHA policies include affirmative steps stated in 24 CFR § 903.15(c)(2)(i) and 24 CFR § 903.15(c)(2)(ii). Furthermore, under 24 CFR § 903.7(o), a PHA must submit a civil rights certification with its Annual and 5-year PHA Plans, except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document. The PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.

PHA Name

PHA Number/HA Code

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802)

Name of Executive Director:

Name of Board Chairperson:

Signature:

Date:

Signature:

Date:

The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 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. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Notice. The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires: 09/30/2027

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or ___ Annual PHA Plan, hereinafter referred to as “the Plan,” of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning _____, in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies, for the PHA's jurisdiction and a description of the way the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the Resident Advisory Board (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the way the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - i. The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - ii. The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - iii. The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours. Where possible, PHAs should make documents available electronically, for public inspection upon request.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment. The PHA ensured all notices and meetings provided effective communication with persons with disabilities and further provided meaningful language access for persons with Limited English Proficiency (LEP).
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), Title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of all HUD programs. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, the Violence Against Women Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of all HUD programs.
7. The PHA will affirmatively further fair housing, in compliance with the Fair Housing Act, 24 CFR § 5.150 et seq., 24 CFR § 903.7(o), and 24 CFR § 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering

fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR § 5.151). Pursuant to 24 CFR § 903.15(c)(2), a PHA's policies should be designed to reduce the concentration of tenants and other assisted persons by race, national origin, and disability. PHA policies should include affirmative steps stated in 24 CFR § 903.15(c)(2)(i) and 24 CFR § 903.15(c)(2)(ii). Furthermore, under 24 CFR § 903.7(o), a PHA must submit a civil rights certification with its Annual and 5-year PHA Plans, except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document. The PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.

8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module and/or its successor system: the Housing Information Portal (HIP) in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination based on age pursuant to the Age Discrimination Act of 1975.
10. In accordance with the Fair Housing Act, the PHA will not base a determination of eligibility for housing on actual or perceived sexual orientation, or marital status and will not otherwise discriminate because of sex (including sexual orientation).
11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, 'Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped' for people with physical disabilities.
12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
13. The PHA will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implement the regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 2 CFR 200.302 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.

20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
21. All attachments to the Plan have been and will continue to always be available at all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA and, where possible, should be made available for public inspection in an electronic format.
22. The PHA certifies that it is following all applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

PHA Name

PHA Number/HA Code

_____ Annual PHA Plan for Fiscal Year 20_____

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

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. **WARNING:** Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802)

Name of Executive Director:	Name Board Chairman:
Signature: _____	Signature: _____
Date: _____	Date: _____

This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires: 09/30/2027

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

I, _____, the _____
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal
year _____ of the _____ is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including any applicable fair housing goals or
strategies to:

Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR Part 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or
State Consolidated Plan.

The City of Roanoke Redevelopment and Housing Authority's PHA Plan aligns with the City's Consolidated
Plan in the areas to increase housing that is affordable and of quality. There is also conformance with the
City's high priority to create and maintain quality neighborhoods, promote economic growth and resilience in
small businesses and within the workforce targeted areas. Leveraging resources and efforts will create
opportunities for program participants and resident's to address quality of life issues.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly
submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil
and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

Name of Authorized Official:	Title:
Signature:	Date:

This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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. Send comments regarding
this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE,
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are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

Attachment C: Resident Advisory Board Comments

The draft 2026 Annual Plan update to the 2025-2029 Agency Plan was provided to the Joint Resident Council, Inc. and active resident councils. Councils were requested to provide comments regarding the 2026 Annual Plan by May 18, 2026.

- 2026 Annual Plan Community Meeting Comments

RRHA held community meetings at all four (4) public housing sites (Villages at Lincoln, Melrose Towers, Morningside Manor, and Bluestone Park) and with Housing Choice Voucher participants and landlords to gather resident input for the 2026 Annual Plan update to the 2025-2029 Agency Plan. Written responses have been provided by RRHA staff. These comments and responses will be included in the 2026 Annual Plan document and will be available for review at all public housing site management offices, the RRHA administrative office, and on the RRHA website.

Villages at Lincoln – February 2, 2026 – 2:00 PM (0 attendees)

Melrose Towers – February 3, 2026 – 1:00 PM (19 attendees)

Capital Improvement Items

1. Lighting in parking lot needs to be improved

Response: The existing site lighting for the parking lot will be evaluated. If it is determined that additional site lighting is needed, the installation of additional site lighting for the parking area will be added to the Capital Fund Five-Year Action Plan for FY 2026.

2. Cabinet renovations due to chipping

Response: Due to current budget constraints kitchen cabinets are replaced when units are renovated. Problems with cabinets or countertops chipping are to be addressed through work order system.

3. Elevators keep breaking down

Response: The two (2) elevators at Melrose Towers undergo a large number of cycles each day. The expected length of service for elevators is 20 – 25 years before major renovations are needed. The elevator cars and hoisting equipment was upgraded in 2010. The elevator doors and door operators were not replaced at that time.

The replacement of elevator doors and door operators is budgeted in FY 2025 Capital Funds. And planned to take place during calendar year 2026.

The replacement of other elevator components will be included in the Capital Fund Five-Year Action Plan.

4. Fenced in dog park requested

Response: Due to current budget constraints for Capital Funds installing fencing for a dog park is currently not possible.

5. Camera upgrades in all hallways, stairwells, and laundry room

Response: RRHA has applied for grants from HUD to fund replacement of surveillance camera system several times without success. Replacement of surveillance camera system will be included in the Capital Fund Five-Year Action Plan for fiscal year 2026.

Management Items

1. Parking lot needs to be repainted

Response: Restriping of the parking lot will be handled through operations budget during calendar year 2026.

2. Water not connected to shower, no water comes out of shower head (Apt 314)

Response: Resolved with work order #33370 on February 10, 2026

3. Illegal drug activity and public drinking in the building

Response: The unfortunate reality is that drugs are everywhere. Tenants should continue to report any illegal drug activity they witness. If you see something, say something. Property Management will follow up to address the issues that are reported. Lisa will send letters to all residents reminding them of zero tolerance policy for illegal drugs and smoking of any kind in the building as well as public drinking.

4. Loud music disturbing the peace; residents have no consideration of others

Response: Tenants are encouraged to call Roanoke City Police for loud music after 10:00 p.m. During normal business hours tenants can stop by the Management Office, call the Management Office, or complete a complaint form located outside the Management Office door.

5. Gas stove not lighting on back left burner and leaving a gas smell in apartment, bathtub is peeling, kitchen cabinets are broken, and stopper not keeping water in bath tub. (Apt 512)

Response: Issues resolved with work order # 33355. Pending completion as of 2/19/26.

6. Residents letting non-residents into the building after security guard has left for the night.

Response: Tenants are reminded that if you let someone into the building, you are responsible for that person. If that person commits a crime, then you will be held accountable and evicted. You are putting your tenancy at risk. Cameras will be updated, but you are here every day. If you see something, say something. Report incidents to the management office. All complaints and reports will remain anonymous.

7. Can Melrose Towers have police walkthroughs?

Response: RRHA will contact Roanoke City Police Department and try to arrange walk throughs

8. Counter is chipped where it meets the wall in kitchen. (Apt 807)

Response: Chips in kitchen countertop are to be handled through work order system.

9. Request for additional security

Response: RRHA will look into adding additional security in the future, if the budget allows.

10. What does it mean to be on a “bar program?”

Response: That means that if someone is here that shouldn't be, we call the police for trespassing and they are barred from property so if they come back they will be arrested.

11. Do complaints need to be made in writing?

Response: No.

Morningside Manor – February 5, 2026 – 1:00 PM (25 attendees)

Capital Improvement Items

1. Camera's need to be repaired

Response: RRHA has applied for grants to fund replacement of surveillance camera system several times without success. Replacement of surveillance camera system will be included in the Capital Fund Five-Year Action Plan for fiscal year 2027.

2. What is RRHA's response to fuel tank for emergency generator leaking?

Response: The fuel tank for the generator was pressure tested according to requirements of Virginia Department of Environmental Quality standards. No leaks were found in tank. In a separate test a very small leak was discovered in the fuel piping between the main underground tank and the day tank for the generator. The soil in the area of the pipe leak was tested for the presence of petroleum products. The amount of petroleum products in the soil samples was below the threshold for requiring any clean up activity. The fuel piping between the main tank and the day tank is being replaced and inspected by staff from the Virginia Department of Environmental quality.

Management Items

1. Sidewalks and streets need to be cleared of snow.

Response: The city is responsible for the sidewalks and can be reached by calling (540) 853-2000. RRHA is not staffed with professional snow plowers and this was ice, not snow. The snow and ice have been compacted and the blades of the trucks will not scrape the roads well. RRHA will learn from this winter storm and be better prepared in the future.

2. Desire for more activity nights including Karaoke, more bingo, craft and movie nights, and outdoor activities for spring.

Response: Please write down any ideas for activities and give them to Kirishia. If she is not available, place your ideas in her box.

3. What can we do about people letting non-residents into the building after the guards leave?

Response: Tenants are reminded that if you let someone into the building, you are responsible for that person. If that person commits a crime, then you will be held accountable and evicted. You are putting your tenancy at risk. Cameras will be updated, but you are here every day. If you see something, say something. Report incidents to the management office. All complaints and reports will remain anonymous.

4. Illegal drug activity, public drinking, and smoking in the building

Response: Tenants are reminded that there is no smoking of any kind permitted in the building. Doing so puts your tenancy at risk. Drinking is not permitted in public areas. Tenants should continue to report any illegal drug activity they witness. If you see something, say something. Property Management will follow up to address the issues that are reported and enforce the lease. You may not realize that management has addressed reported issues, but trust that this is happening.

5. Residents are not cleaning up after their dogs

Response: Report this to the management office. Offenders will be charged. Residents will be reminded of the proper locations to take pets outside.

6. Bathroom exhaust fans not working (apt 504)

Response: Air within apartment units is constantly being drawn out through vents located in bathrooms and kitchens by exhaust fans located on the roof. The roof top fan serving the bathroom for Apartment 504 will be checked for proper operation.

Bluestone Park – February 6, 2026 – 2:00 PM (10 attendees)

Capital Improvement Items

1. Playground Improvements:

Response: The playground equipment will be inspected for condition and presence of any safety hazards. Any safety hazards observed will be corrected immediately. If the condition of the playground equipment is found to be in need of repairs, they will be scheduled.

The expected length of service for coated steel playground equipment is 20 – 25 years before replacement is needed. The existing playground and equipment was installed in 2010.

Replacement of steel playground equipment will be added to the Capital Fund Five Year Plan.

2. Additional lighting needed in playground area.

Response: The location of existing site lighting in the area of the playground will be evaluated. If it is determined that additional site lighting is needed, the installation of the additional site lighting will be added to the Capital Fund Five-Year Action Plan.

3. Dryer hookups in the laundry rooms.

Response: Installation of ducting and electric power for dryers will be added to the Capital Fund Five-Year Plan.

4. Insulation in boiler rooms to prevent pipes from freezing

Response: RRHA Construction Specialist will investigate situation where piping froze. All piping in boiler rooms should be insulated.

5. Complaints about contractors being sloppy and leaving a mess behind when completing work (i.e. window replacements needed additional plastering and painting after the work was completed; windows not fitted well and make a lot of noise now when the wind blows)

Response: Complaints or questions regarding quality of contractor workmanship should be directed to property management or a RRHA Construction Specialist. It is best if complaints are made or questions are asked while the contractor is still working on the project.

6. Power outlets push into the walls and need to be updated.

Response: Replacement of loose, worn or damaged receptacles is to be handled through RRHA's work order system.

7. Screen doors on the new houses

Response: Screen doors were not installed on the two (2) units at the time the units were constructed due to the units having central air-conditioning. Screen doors can be installed on the entrance doors for the units if budgetary constraints permits.

8. Is RRHA still working to get everyone new bathrooms?

Response: When the bathroom renovation project is complete, the bathrooms in all 72 of the original apartment units at Bluestone Park will have been renovated.

Management Items

1. Lights are out behind 2707 Bluestone

Response: An electrical contractor will be contacted to investigate and repair inoperable site lighting.

2. Trees need to be trimmed behind houses to prevent them from falling into residents' yards.

Response: The conditions of trees along property lines at Bluestone Park will be evaluated. If it is determined that trees present a danger RRHA will have the trees trimmed.

3. Heating works in some parts of the house but not others. Thermostats are messed up. (Apts 2815 and 2618 Bluestone)

Response: The units at Bluestone Park have hot water baseboard heat. The hot water heat piping for an apartment unit is a continuous loop. The hot water leaves the heat boiler and runs through the entire unit before returning to the boiler. If the hot water is circulating and providing heat in one room of the apartment unit it is also circulating and providing heat in the other rooms. The thermostat governs the entire heat system for an apartment. Problems with thermostats/heat are to be handled through the work order system.

4. Heat not working. Still waiting on contractors to complete repairs. Takes almost a whole day with heat running to warm up the apartment and the bathroom stays cold. (Apt 2803)

Response: Often, contractors are already working at making repairs at other jobs or having to wait on parts to be delivered before repairs can be completed resulting in delays for repairs to be completed.

RRHA staff will follow up on status of repairs.

5. Can we sign something to confirm a work order is completed?

Response: Maintenance procedures are being reviewed for staff to require signatures from residents upon completion of work orders.

6. Wiring is a fire hazard. The wiring has blown two ACs. (Apt 2803)

Response: In choosing window air-conditioning units residents need to consider the electrical capacity of the circuit that will be used to power the air-conditioning unit. Air-conditioning units that require more electrical power to operate than what is available will likely cause the circuit breaker to trip or cause damage to the air-conditioning unit.

7. Trucks coming through early in the morning waking people up.

Response: Bluestone Ave., Sand Road, and Liberty Road are public streets. The Western Virginia Water Authority (WVWA) owns property at the end of Liberty Road. The trucks likely belong to WVWA which are moving materials to and from that property.

8. Who do we contact when the power goes out? When we call AEP, they can't tell us when the power will come back on because our name is not on the bill.

Response: If your power goes out, please contact the Property Manager and they will relay this information to you. If a power outage occurs outside of office hours, please call the maintenance line to report the outage and the Property Manager will follow up with you as soon as possible.

9. Request for new trash cans

Response: New trashcans were ordered and delivered on February 27, 2026.

10. Installation of speed bumps in streets

Response: The streets within Bluestone Park development are public streets. Installation of speed bumps is not permitted

HCV Landlord Meeting – March 13, 2026 – 10:00 AM (25 attendees)

1. Will RRHA approve rent increases greater than \$50? If so, what is the cap on rent increases?

Response: Yes. The cap on rent increases is determined by rent reasonableness comparisons of the rent of similar units in the same neighborhood.

2. Legislation in Richmond is raising costs for landlords. Is Rent Reasonableness going to keep up with that?

Response: Rent Reasonableness compares the rent requested for your unit to the rent of the surrounding units that are similar in size and structure. If rent is going up in those comparable units, then the rent requested may be considered reasonable for your unit as well.

3. Is the funding for Section 8 closing?

Response: No, the program is not ending. The Housing Choice Voucher (HCV) Program received level funding for the fiscal year. This means that RRHA has enough funding to house all the families housed the previous year, plus a few additional vouchers to count for attrition.

4. Now that the HCV Department is fully staffed, are recertifications going to start catching up?

Response: As of March, HCV has caught up as far as December on all caseloads and will be fully on track soon.

5. There are a lack of vouchers on the streets. Is that going to start picking up?

Response: RRHA selected 120 families from the HCV Waiting List the first week of March 2026 and will continue selecting families each month for as long as HUD allows more vouchers to be issued.

6. For residents that are in three (3) bedroom units but no longer need them due to reduced family size, can rent increases match the market value for that size unit?

Response: If the family is staying in the unit, this will be determined by rent reasonableness. However, if the family is moving their voucher size and the accompanying payment standard are also factored in to determine the affordability of rent.

7. If tenants vacate, how do I find new voucher holding families to rent to?

Response: Advertise your unit. You can post it in the Lobby at the Section 8 office or choose to be listed on the HCV Landlord Listing. If an applicant for your unit has a Section 8 voucher and is ready to move, they will be able to provide you with the RFTA.

8. If someone applies for my unit and says they have a voucher, should they already have the Request for Tenancy Approval (RFTA) in hand?

Response: Yes, if they are ready to move, they will have the RFTA document for you to fill out. Otherwise they have not satisfied the moving requirements.

9. Do tenants have to give a sixty (60) day moving notice?

Response: Tenants are required to follow the terms of your lease. RRHA prefers that tenants move at the recertification date when possible.

10. How much advanced notice should I provide to Section 8 when I need to meet with staff? The last two times I came to the office, I had to wait in the lobby for 30 to 45 minutes.

Response: Walk-ins in the lobby are always first come, first served. To avoid wait times, please schedule an appointment with HCV Staff. The best way to make an appointment is via email. If you do not receive a response within 24 hours, please email HCV Manager, Shauna Paxton at spaxton@rkehousing.org.

11. What is the best way to assess the market rent for my property? Does Section 8 have a service?

Response: RRHA recommends using <https://affordablehousing.com> to assess the reasonable rent for your units. This is the website HCV uses to complete Rent Reasonableness Comparisons, and it is free for landlords to register. You are also able to post free advertisements for your units on this website.

12. If tenants are not home when the HCV Inspector comes, is it OK for the management office to open the door for them to complete the inspection? If tenants are losing their assistance for not complying with inspections, it hurts the landlord.

Response: A household member 18+ must be present for the inspection. However, if there is written evidence of communication between the landlord and tenant to confirm that the landlord is permitted to enter the unit for the inspection with the HCV Inspector, then that would be permissible. An acceptable example is an email to the tenant asking permission to open the door for the HCV Inspector in their absence with the HCV Specialist and Inspector copied to the email.

13. Should landlords be sending lease violation notices to RRHA?

Response: Yes. A copy of the lease violation should be provided to the HCV Specialist. If you are uncertain of the caseworker for your tenant, that information is available in the Landlord Portal. If you need more information about accessing the Landlord Portal, you can find it on

RRHA's website at <https://rkehousing.org/housing-options/section-8/landlord-information/> or by emailing Shauna Paxton at spaxton@rkehousing.org.

14. I am having trouble with the landlord portal. It logs you out too quickly.

Response: This information will be relayed to our service provider.

15. Does Section 8 still give tenants twelve (12) months to pay for damages?

Response: Yes, tenants will be terminated if you have provided a copy of the judgement from the courts to the HCV Specialist and fail to repay in full within twelve (12) months. Please communicate with the HCV staff when there are damages and provide photos when possible. HCV Participants may be terminated from the program for destroying a landlords unit as this is a violation of the Family Obligations set forth by HUD.

16. Is email the best way to get in touch with HCV Staff?

Response: Yes, please. If HCV staff members have families in their office, they are not able to answer the phone in order to protect confidentiality rights.

17. If a tenant cannot attend their recertification appointment, can the landlord send their recertification paperwork in to RRHA on their behalf?

Response: Unless this is a request for a reasonable accommodation for someone with disabilities, RRHA requests that all families come to the office for their recertification appointments. There are additional forms that must be signed at the appointment.

18. Is RRHA adding vouchers?

Response: RRHA has not been awarded additional vouchers by HUD. However, all of the vouchers currently held have not been filled and the HCV Department will be making selections from the waiting list to issue more vouchers in the coming months. Over the last few years, RRHA has not issued many vouchers and due to families leaving the HCV Program for various reasons, there are vouchers available.

19. Are those applicants being selected individuals that have been on the waiting list for a while?

Response: All applicants being selected applied to the HCV Waiting List in 2022.

20. If renovations in the unit make it uninhabitable, is it the landlord's responsibility to secure other housing for residents?

Response: Yes, that is correct.

*** Landlords are reminded that NSPIRE inspections will replace HQS inspections beginning October 2026. Please reach out to Shauna Paxton, HCV Manager, at spaxton@rkehousing.org if you have questions.

Resident/Participant Comments Received Via Survey Response, Email, Phone Message or Letter:

Lansdowne Park

1. *Are you experiencing any issues with management that need to be resolved? Does the property management staff treat you with respect and in a professional manner? If so what are they?*
 - a. Staff is respectful
 - b. No issues with management
 - c. Yes they do [treat me with respect and in a professional manner]

Response: Thank you for your responses. The Lansdowne Park Management office strives to provide excellent customer service and respect to all residents.

2. *Are there any issues with your unit that need management's attention, please be specific? If so what are they?*
 - a. Need two bedroom doors (2522 Salem Turnpike)

Response: Replacement of doors will be handled through work order #33973

- b. The heat hasn't worked properly in 3 years and is currently (02.05.06) not working in the upstairs bedrooms. The water is unpredictable, sometimes doesn't get hot at all. The wiring is faulty, only certain outlets work. (2908 Salem Turnpike)

Response: Currently RRHA has a contractor replacing the heating boilers that provide hot water heat for 2908 Salem Turnpike. During that process the radiators in the unit will be checked to see if they are air-locked or not receiving proper water flow.

Problems with electrical system are to be addressed through work order #33974.

- c. Heat and hot water (2914 Salem Turnpike)

Response: Currently RRHA has a contractor replacing the heating boilers and the domestic water heater that provide hot water heat and domestic hot water for 2914 Salem Turnpike. During that process the radiators in the unit will be checked to see if they are air-locked or not receiving proper water flow. Operation of domestic hot water will be inspected as well.

- d. No heat (2902 Salem Turnpike)

Response: Currently RRHA has a contractor replacing the heating boilers that provide hot water heat for 2902 Salem Turnpike. During that process the radiators in the unit will be checked to see if they are air-locked or not receiving proper water flow.

- e. Need commode fixed in bathroom (2818 Salem Turnpike)

Response: Repairs to toilet were completed through work order #33168

- f. Just the leak in the kitchen (611 30th Street)

Response: Investigation and repair of the leak handled thorough work order #32523

- g. Hot water temperature and pressure. Maintenance always says just wait but throughout the day its only lukewarm and I have to boil water for dishes and go to my mom's to shower. (2715 Glengary Ave)

Response: Hot water system investigated by Construction Specialist. A damaged valve was discovered that was either partially or fully shut. Construction Specialist was able to operate valve to the degree that appeared top let hot water flow through piping. Replacement of the valve will be scheduled with a contractor.

3. *Are the common areas (Example: entry, hallway(s), common rooms) around your unit well maintained? Are the locks the building's outside door(s) in good condition and working properly? Are the common bathrooms, trash/recycling, and laundry rooms well maintained? List your responses and please try and be as specific as possible:*

- a. Yes, all maintained
- b. No issues with either of these
- c. All good
- d. Don't have any [issues]
- e. Everything is good
- f. None on site
- g. No, the backdoor screen is unmanageable (2440 Delta Drive)

Response: Repairs to the screen on backdoor were scheduled through work order #32995 and are pending receipt of needed parts as of February 27, 2026.

4. *Please list any specific things that should be done to improve the quality of your unit or the property as a whole:*

- a. It would be nice to have a laundry facility or dryer hookups.

Response: All the apartment units at Lansdowne Park have the means to connect clothes washers to water supply, electricity and a drain for waste water. The feasibility of adding an electrical connection and exhaust venting for clothes dryers will be studied. If feasible, that work will be added to RRHA's Capital Fund 5-Year Action Plan.

- b. Heat and hot water (2914 Salem Turnpike)

Response: Currently RRHA has a contractor replacing the heating boilers and the domestic water heater that provide hot water heat and domestic hot water to 2914 Salem Turnpike. During that process the radiators in the unit will be checked to see if they are air-locked or not receiving proper water flow. Operation of domestic hot water will be inspected as well.

- c. Replace boilers ASAP, electrical needs replacing, cabinets need replacing, water needs to be consistently hot at all times (2908 Salem Turnpike)

Response: Currently RRHA has a contractor replacing the heating boilers and domestic water heaters that provide hot water heat and domestic hot water to 2908 Salem Turnpike.

Currently RRHA has a contractor replacing the kitchen cabinets and installing range hoods for all of Lansdowne Park. Each apartment unit will be notified in advance as to when the kitchen cabinets are scheduled to be replaced in the unit in which they are living.

The existing electrical panels installed in the apartment units at Lansdowne Park have not reached the expected end of their operational life. Therefore, the replacement of electrical panels is not included in RRHA's Capital Fund 5-Year Action Plan. Problems experienced with the electrical system is to be handled through the work order system.

The feasibility of adding additional electrical circuits in the apartment units at Lansdowne Park will be studied. If it is determined to be feasible, that work will be added to RRHA's Capital Fund 5-Year Action Plan.

- d. It would feel extra safe if we could also have access to security cameras

Response: Due to privacy rights, tenants will not be given access to security cameras. However, Lansdowne Park has an assigned captain that shares monthly information concerning police calls and incidents that occur on the property. Large "No Trespassing" signs have been posted on all corners of Lansdowne and the Roanoke City Police Department monitors the property.

5. *How safe do you feel in your unit and building?*

- 4 Very Safe
- 2 Somewhat Safe
- 1 Somewhat Unsafe
- 1 Very Unsafe

6. *If you feel unsafe in your building, please explain why:*

- a. People knocking on your back door after midnight
- b. The kids in neighborhood, kids and one adult being too close

Response: Please contact the police department to record incidents that occur. Residents may also provide a confidential statement to the management office reporting incidents, but all criminal activity should be reported to the police.

7. *Is there anything that you would like to tell us about your unit or building that you would like to see addressed in RRHA's Annual Plan or the Capital Fund 5 year Plan submission to HUD?*

- a. Just a dryer hookup or laundry facility
- b. Unit needs to be updated so the issues (boilers, electrical, cabinets, hot water) listed will be addressed
- c. Heat and hot water

Response: All the apartment units at Lansdowne Park have the means to connect clothes washers to water supply, electricity and a drain for waste water. The feasibility of adding an electrical connection and exhaust venting for clothes dryers will be studied. If feasible, that work will be added to RRHA's Capital Fund 5-Year Action Plan.

Approximately two-thirds of the heating boilers and domestic water heaters have been replaced at Lansdowne Park. Bids from contractors will be solicited for the last phase of the work this spring with replacement work being performed in late summer or early fall 2026.

Currently RRHA has a contractor replacing the kitchen cabinets and installing range hoods for all of the apartment units at Lansdowne Park. As of March 1, 2026 work is complete in approximately 50% of the units. Each apartment unit will be notified in advance as to when the kitchen cabinets are scheduled to be replaced in the unit in which they are living.

Hunt Manor

1. *Are you experiencing any issues with management that need to be resolved? Does the property management staff treat you with respect and in a professional manner? If so what are they?*
 - a. No issues / Yes [staff treats me with respect and in a professional manner]
 - b. Management has always been respectful towards me
 - c. The management staff treat me OK, but they are a little understaffed. They need more maintenance men to work the orders that are put out and they need to fix it and stop looking.
 - d. None. Manager is a very good person. She is very strong to be able to manage these apartments ☺

Response: Thank you for your feedback.

2. *Are there any issues with your unit that need management's attention, please be specific? If so what are they?*

- a. Still never received new stove supposed to get almost 2 years ago (801-6)

Response: New ranges were purchased for all the apartment unit at Hunt Manor in 2020. Replacement of ranges for Hunt Manor using Capital Funds is scheduled for 2031.

- b. The heat never has worked. It still doesn't work. Affects my utility bill. (807-3)

Response: A RRHA Construction Specialist will investigate heating system for the unit.

- c. Was supposed to get a new refrigerator when COVID hit and I'm still waiting on it. Kitchen sink and counter needs to be replaced. (807-13)

Response: New refrigerators were purchase for all the apartment units at Hunt Manor in 2022 using Capital Funds. Replacement of refrigerators for Hunt Manor using Capital Funds is scheduled again for 2032. Property management will investigate the condition of refrigerator, kitchen sink and kitchen countertop to determine need for replacement.

- d. New light over top of the stove and sink (804-6)

Response: Work order # 33297 was added and still pending completion as of 3/7/2026.

- e. My sink faucet in the kitchen needs to be replaced. The fan in the bathroom is making some loud noise all the time, also need to get the tenants to clean up behind their dogs when let out to use the bathroom in my back yard. Looks bad. (812-3)

Response: Problems with kitchen faucet and bathroom exhaust fan are to be handled through work order system.

- f. Fire detector needs battery; front porch light has short in it/doesn't work. (807-11)

Response: Problems with smoke/CO detectors and porch lighting are to be handled through the work order system.

3. Are the common areas (Example: entry, hallway(s), common rooms) around your unit well maintained? Are the locks the building's outside door(s) in good condition and working properly? Are the common bathrooms, trash/recycling, and laundry rooms well maintained? List your responses and please try and be as specific as possible:

- a. Everybody lets their dogs out and they use the bathroom everywhere; Person in [neighboring apartment] throws food, trash and cat litter everywhere.

Response: Report this to the management office. Offenders will be charged.

- b. The yards around units back and front need to try better to clean it up behind the dogs and the paper they throw down, it makes it look bad. Also summer is coming outside smoking on the porches and yard and it comes in my apartment, I don't smoke.

Response: Report this to the management office. Offenders will be charged. Residents are not permitted to smoke inside the units and must go 25 feet away from the property while smoking. If this policy is not being followed, report offenders to the management office.

- c. Front door seal needs to be replaced to keep cold air out. Front screen door still needed. Back door will not latch

Response: Work order # 33297 was added and still pending completion as of 3/7/2026.

- d. Yes [well maintained]; no issues
e. Yes, everything is working good.

4. Please list any specific things that should be done to improve the quality of your unit or the property as a whole:

- a. We need bulk pick up or more dumpsters

Response: RRHA is considering this request and the budget will be evaluated for the purchase of additional dumpsters and bulk pick-up.

- b. The parking lots need to be repainted so you can park in the right space. It will be better if they can give all tenants that own a car that is signed in their own name their own parking space and a space for their visitor

Response: Restriping of parking lots will be added to RRHA's Capital Fund 5-Year Action Plan.

- c. Yes, people need to stop throwing trash all over the grounds and dog poop being left on the ground needs to be addressed.

Response: Report this to the management office. Offenders will be charged.

- d. Kids need a curfew.

Response: All city curfews must be implemented by the City Council and Mayor. RRHA is not authorized to do so.

- 5. *How safe do you feel in your unit and building?*

- 3 Very Safe
- 2 Somewhat Safe
- 1 Somewhat Unsafe
- 0 Very Unsafe

- 6. *If you feel unsafe in your building, please explain why:*

- a. Only issue is with dogs off the leash.

Response: Report this to the management office. Offenders will be charged.

- b. With just one lock it's very easy to get in these doors. Half of the street lights are out.

Response: Report to Property Management the locations where street lights and site lighting are inoperative so that repairs can be scheduled.

- 7. *Is there anything that you would like to tell us about your unit or building that you would like to see addressed in RRHA's Annual Plan or the Capital Fund 5 year Plan submission to HUD?*

- a. Better storm door, if it is a wall that can be built on the porches, so the tenant know to stay on their porch, but that may be a little hard to do but it would be nice.

Response: The feasibility of installing dividing walls on front porches will be studied. If feasible that work will be added to RRHA's 5-Year Capital Fund Action Plan.

- b. Only thing I need is my new fridge and a new kitchen sink and counter. The faucet leaks when you turn water on.

Response: Problems with leaking faucet are to be handled through the work order system. Property management will investigate the condition of refrigerator, kitchen sink and kitchen countertop to determine need for replacement.

Melrose Towers

- 1. *Are you experiencing any issues with management that need to be resolved? Does the property management staff treat you with respect and in a professional manner? If so what are they?*

- a. They treat me very well!!! Very professional.
- b. They treat me very well.
- c. I have no issues with anybody. Everybody is so sweet and helpful We LOVE Tiffany, Lisa, and Chris (from maintenance).
- d. No issues and they are professional
- e. No

- f. Friendly staff
- g. I have had no issues with the management here. Everyone has been very helpful and nice.
- h. Personally I have always been treated kindly and fee like everyone is respectful
- i. Yes, they are very nice
- j. Yes they respect me all the time in a professional way with my rent and if I have certain issues they address them too.
- k. Yes! "Thanks!"
- l. Sometimes they just don't want to listen or care if someone does something that's against policies and about drugs

Response: Thank you for your feedback. The Melrose Towers Management Office strives to provide excellent customer service and respect to all residents.

2. *Are there any issues with your unit that need management's attention, please be specific? If so what are they?*

- a. Kitchen drawer is broken. Closet door needs to be fixed. I also need a bar to help me get in and out of the bathtub. (Apt. 222)

Response: Repairs to kitchen cabinet drawer and closet door to be handled through work order system. Submit request for reasonable accommodation to property management for installation of grab bars for bathtub.

- b. I have a gap in my door where I can see the hallway outside my door and air blows in from outside. (Apt 717)

Response: Part of the HVAC system for the building involves the space underneath the apartment doors. Fresh conditioned air is brought into the building by the roof top HVAC units and is distributed through large registers on each hallway. The air is then drawn under the apartment entrance doors and exits the apartment units through wall vents located in kitchens and bathrooms by exhaust fans on the roof top.

3. *Are the common areas (Example: entry, hallway(s), common rooms) around your unit well maintained? Are the locks the building's outside door(s) in good condition and working properly? Are the common bathrooms, trash/recycling, and laundry rooms well maintained? List your responses and please try and be as specific as possible:*

These comments and concerns were addressed during the Melrose Towers Community Meeting held on February 3, 2026 and responses can be viewed above.

4. *Please list any specific things that should be done to improve the quality of your unit or the property as a whole:*

- a. I feel that I could use another kitchen and cabinet set because the cabinet underneath my sink is dry rotted and it is about ready to break. Where you open the cabinet doors, I feel they pieced my bar together because it has baps in it too and my toilet lid does not fit my toilet right. (Apt 717)

Response: Condition of kitchen cabinets and countertop to be evaluated by RRHA Construction Specialist to determine if the cabinets and countertops need to be replaced.
Replacement of toilet seat and lid to be handled through work order system.

- b. Need new cabinets in my kitchen (Apt 721)

Response: Condition of kitchen cabinets and countertop to be evaluated by RRHA Construction Specialist to determine if the cabinets and countertops need to be replaced.

- c. Updated elevators, the drink machines need to be updated, I've been losing money, updated washers & dryers, a dog park for residents that have dogs, a pool and workout room for people to work out.

Response: Improvements to elevators is included in Capital Fund 5-Year Action Plan.

Elevators were last upgraded in 2010 with replacement of hoisting equipment, guides, controls and car interiors scheduled for 2030.

Installation of a pool and equipping a workout room are not allowable expenses for Public Housing funds.

- d. Paint lines for handicapped parking spots please!

Response: Restriping of parking areas is scheduled for 2026.

- e. Replace the elevators, they break down a lot.

Response: Improvements to elevators is included in Capital Fund 5-Year Action Plan.

Elevators were last upgraded in 2010 with replacement of hoisting equipment, guides, controls and car interiors scheduled for 2030.

- f. My floor looks so bad. It is terrible with all the tiles and they are white and black tiles. The gloss person have gotten the tiles ruined and it doesn't come off. There are a lot of spots and I think asbestos left.

Response: A RRHA Construction Specialist can evaluate the condition of floor tile and make a determination regarding condition.

5. *How safe do you feel in your unit and building?*

8 Very Safe
6 Somewhat Safe
3 Somewhat Unsafe
0 Very Unsafe

6. *If you feel unsafe in your building, please explain why:*

These comments and concerns were addressed during the Melrose Towers Community Meeting held on February 3, 2026 and responses can be viewed above.

7. *Is there anything that you would like to tell us about your unit or building that you would like to see addressed in RRHA's Annual Plan or the Capital Fund 5 year Plan submission to HUD?*

- a. I wish that they would put more chairs in the lobby. They only have six chairs there and we like to talk to friends.

Response: The Property Manager will look into adding additional seating (set of three chairs) in the lobby.

- b. Keep elevators working properly

Response: RRHA currently has a contract with an elevator contractor to perform inspections, maintenance and repairs on elevators according to regulations governing elevators.

Elevators were last upgraded in 2010 with replacement of hoisting equipment, guides, controls and car interiors scheduled for 2030.

- c. Updated elevators, a dog park for the dogs to let off their built up energy, a pool, an ATM machine or change machine for washing clothes and the drink machine.

Response: Improvements to elevators is included in Capital Fund 5-Year Action Plan.

Elevators were last upgraded in 2010 with replacement of hoisting equipment, guides, controls and car interiors scheduled for 2030.

Installation of a pool is not an allowable expense for Public Housing Capital Funds.

Bluestone Park

1. *Are you experiencing any issues with management that need to be resolved? Does the property management staff treat you with respect and in a professional manner? If so what are they?*

- a. I don't have any personal issues with management.

2. *Are there any issues with your unit that need management's attention, please be specific? If so what are they?*

- a. I live in a newly built unit and I don't have screen doors and there is a gap in between the door and the floor big enough for any outside animal to get in (2816 Bluestone)

Response: RRHA Construction Specialist will investigate the condition of the door and make recommendations for any repairs needed.

Screen doors were not installed on the two (2) units at the units were constructed due to the units having central air-conditioning. Screen doors can be installed on the entrance doors for the units if budgetary constraints permit.

- b. Over time that I live here I pay for three air conditioners and the power from the outlet cut off the air conditioner – outlet control the power in the wall. I just paid for a new air conditioner,

please hurry and move me. I can't use my air conditioner. Outlet in my living room wall doesn't work. (2803 Bluestone)

Response: In choosing window air-conditioning units residents need to consider the electrical capacity of the circuit that will be used to power the air-conditioning unit. Air-conditioning units that require more electrical power to operate than what is available will likely cause the circuit breaker to trip or may cause damage to the air-conditioning unit.

3. *Are the common areas (Example: entry, hallway(s), common rooms) around your unit well maintained? Are the locks the building's outside door(s) in good condition and working properly? Are the common bathrooms, trash/recycling, and laundry rooms well maintained? List your responses and please try and be as specific as possible:*

These comments and concerns were addressed during the Bluestone Park Community Meeting held on February 6, 2026 and responses can be viewed above.

4. *How safe do you feel in your unit and building?*

1 Very Safe
0 Somewhat Safe
1 Somewhat Unsafe
0 Very Unsafe

5. *If you feel unsafe in your building, please explain why:*

These comments and concerns were addressed during the Bluestone Park Community Meeting held on February 6, 2026 and responses can be viewed above.

6. *Is there anything that you would like to tell us about your unit or building that you would like to see addressed in RRHA's Annual Plan or the Capital Fund 5 year Plan submission to HUD?*

- a. The playground is unsafe for kids. The nails are coming up.

Response: RRHA will inspect the playground for safety issues, including the condition of the border. Any safety deficiencies will be corrected.

Housing Choice Voucher Landlords

1. *Are you experiencing any issues with management that need to be resolved? Does the management staff treat you with respect and in a professional manner? Please include your company name. If so what are they?*

- a. It is impossible to reach anyone at RRHA. No one answers the phones! Each recording gives you a number to call if you do not get a response. These numbers are also never answered or calls returned.

- b. If I call or send an email to someone at the Housing Authority regarding tenants, I almost never receive a response by either phone or email. These items are very frustrating for a landlord and are very unprofessional on the part of the Housing Authority.
- c. The overall issue I have with Section 8 is communication! The only way I ever can get a reply (other than Christian Niebles who is absolutely great to work with) is by coming in and waiting to see someone. My emails go unanswered and I can't reach anyone by phone. Leah gave me her contact info but still problem. When William Morris was there, I was told he did not have a telephone #. That is hard to believe.
- d. State a next point of contact when an employee is out of office in order to handle time-sensitive issues and have that contact issue a timely response.
- e. Better contact or communication

Response: Thank you for sharing your concerns. We understand how important timely communication is when managing tenant matters. Our office has been experiencing a staffing shortage, which has unfortunately contributed to delays in returning calls and emails.

To help address this, staff voicemail messages have been updated with the correct points of contact so callers can reach the appropriate person for assistance. Additionally, each family is assigned a dedicated point of contact, and we encourage landlords to utilize that contact for questions, updates, or time-sensitive issues related to their tenant.

We are also researching additional contact methods to improve accessibility and ensure landlords and participants have more reliable ways to communicate with our office.

We value our landlord partners and appreciate your patience as we continue working to improve communication and response times.

- f. While the program serves an essential role, administrative and procedural challenges have increasingly discouraged landlord participation. These challenges ultimately reduce available housing options for voucher holders and place additional strain on the program... Communication improvements are needed. A dedicated point of contact, timely responses, and functional online systems would reduce confusion and administrative delays for both landlords and tenants.

Response: Thank you for sharing your feedback. We are aware of the concerns related to delays in responses and communication and are actively working to improve these areas.

Each family in the program is assigned a dedicated point of contact, and we encourage landlords and participants to utilize that contact for questions, updates, and assistance. Strengthening communication and responsiveness remains a priority, and we appreciate your patience as we continue working to improve the process for both landlords and tenants.

- g. No issues with management. Staff is very professional – Kendall Woodward has always kept me informed as to changes.
- h. Management has always been very professional and respectful.
- i. No [issues with management], yes they show us respect and they are kind and nice.

Response: Thank you for taking the time to share your positive experience. We are glad to hear that you have found our team to be professional, respectful, and communicative.

2. *Are there any issues that need management's attention, please be specific? If so what are they?*

- a. Being responsive. Annual rent increases are ignored and not responded to. Tenant damage is ignored and not dealt with. Late payments are not dealt with.

Response: Please be assured that all requests are addressed, provided they are received. To help ensure timely responses, we ask that annual rent increases, tenant reports, and late payment concerns be submitted via email whenever possible. This creates a clear record and reduces the risk of requests being delayed or lost through U.S. Mail.

We appreciate your cooperation in using email for submissions, as it helps us respond more efficiently and effectively.

- b. First, inspection and approval delays remain a significant concern. Extended vacancy periods caused by scheduling backlogs and re-inspection delays create financial hardship for property owners and management companies. Establishing consistent inspection timelines, offering provisional approvals for previously compliant units, and expediting re-inspections would greatly improve efficiency and housing availability. Second, inspection standards would benefit from greater consistency across jurisdictions in Virginia. Units are often failed for minor cosmetic issues that do not impact health or safety. Standardized criteria and reasonable repair periods would allow landlords to address issues without unnecessary loss of tenancy.

Response: Thank you for your feedback regarding inspection and approval timelines.

Please note that we have only one inspector assigned to these units, which can affect scheduling. To help reduce delays, we ask that you provide the date the unit will be ready for inspection and ensure it is indeed ready on that date. Multiple re-inspections occur when units are not prepared, which contributes to extended timelines.

Inspections are scheduled based on the move-in date you request on the RFTA and cannot occur before that date. Tenants are also not permitted to move in prior to the date listed on the RFTA. To avoid delays, please complete the RFTA thoroughly and plan accordingly when preparing the unit for inspection. Ensuring the unit is ready on the scheduled date helps minimize re-inspections and keeps the process on track.

We also follow HUD guidelines on inspections, including standards for health and safety and reasonable repair periods, to ensure compliance and consistency across all units.

We appreciate your cooperation and understanding as we work to maintain timely and efficient inspections.

- c. Currently I am waiting on contract renewals for two tenants one of which was due December 1, 2025 and the other is February 1, 2026. Annual rent increases were sent in for both 60 days in advance and have been ignored. This causes difficulties in our accounting side as we are getting shorted and then whenever Section 8 decides to catch up it causes us to have to spend time reworking our books. Also, if there is a discrepancy between what we ask and Section 8 response, we are stuck. We have to give the tenant 60 days' notice but that doesn't happen until we get a response from Section 8. That is not fair!

Response: Thank you for bringing your concerns to our attention regarding the pending contract renewals and rent increase requests.

We understand that delays can create challenges with accounting and tenant notice requirements. Please note that no request is ignored. Rent increase requests must be reviewed to ensure compliance with program regulations, including rent reasonableness and payment standards. We must also receive all required information from the tenant before approval can be issued.

We are currently reviewing the files. To discuss this matter further or receive a more direct update, please reach out to the HCV Manager directly.

We appreciate your patience and your participation in the program.

- d. We are curious as to how a client is allowed to continue to benefit from RRHA assistance when they have a balance owed to a previous landlord. There should be a standard protocol in place to eliminate this fraud/abuse from happening.

Response: Thank you for bringing your concern to our attention. We understand your frustration regarding tenants who may have outstanding balances with previous landlords. Under the Housing Choice Voucher (Section 8) program guidelines, RRHA does not have the authority to withhold or terminate a participant's assistance solely due to a balance owed to a previous private landlord unless there is documentation showing a program violation, lease violation, or court judgment that affects the participant's eligibility under HUD regulations.

However, RRHA does encourage participants to ensure that all rent and any outstanding balances with their current landlord are paid prior to requesting to move. Maintaining a good rental history is important and helps support successful participation in the program. Landlords also have the right to pursue unpaid balances through standard legal or collection processes. If documentation such as a court judgment becomes available, it can be reported to RRHA and may be reviewed as part of the participant's compliance with program obligations.

- e. I am satisfied with the staff and management except for one issue: A section 8 tenant was moving to another address. The tenant was given permission to move into my unit before it was inspected. It took some time for the unit to be inspected so no rent was paid for half of November and three days in December. The tenant was assuming the rent would be paid, then the tenant and I were informed that the rent for that period would not be covered because no rent could be paid until the unit was inspected which was done on December 4, 2026. Now the tenant is in a situation that she is unable to pay rent for that period. Is there any way that RRHA and Section 8 can help. (Tenant: 006194)

Response: Thank you for sharing your concern. We appreciate your feedback and are glad to hear that you have been satisfied with the staff and management overall.

Regarding the situation you described, under the Housing Choice Voucher (Section 8) program, assistance payments cannot begin until the unit has passed the required inspection and the contract has been fully executed. Unfortunately, any time the tenant moves into a unit before the inspection is completed and approved cannot be covered by the program. Because the inspection was completed on December 4, assistance payments

could only begin from that date forward. We understand that this situation can be difficult for both the landlord and the tenant. While RRHA is unable to issue retroactive payments for the period before the inspection approval, we encourage the tenant to contact their Housing Specialist to discuss their situation. They may be able to provide guidance on available community resources or payment arrangements that could help.

- f. [Tenant: 013873] said she talked to you and you were paying her rent – No, I am getting no rent from this address. She is significantly behind. We need to get all of this straight please.

Response: Our records show that all payments due have been issued, and at this time I am not finding any issues with the account. If you still have questions or need further clarification, please contact the HCV Manager directly for additional assistance.

- g. No issues
h. No
i. None

Response: We are glad to hear that you have not experienced any issues and that your interactions with our program have been positive. We appreciate your continued support and partnership in helping families access safe and stable housing.

3. *Please share ideas and/or suggestions in order to fully utilize our program and services. List your responses and please try and be as specific as possible:*

- a. RRHA [Housing Choice Voucher Program] could not exist without landlords that are willing to participate in the program. Ten years ago the rent paid by RRHA was top of the market. Not anymore. We can get higher rent and not have to deal with all the problems Section 8 tenants have.

Response: Your participation is valued and appreciated. We recognize that the Housing Choice Voucher Program depends on the participation of landlords who are willing to partner with us to provide housing opportunities for families in our community. Payment standards are established based on federal guidelines and market data, and we understand that rental markets have changed significantly over time. We continue to review payment standards and market conditions to ensure they remain as competitive and reasonable as possible within program regulations.

- b. Current payment standards frequently fall below market rents, particularly in areas experiencing rising operating costs. Property taxes, insurance, labor, and materials have increased significantly, yet Fair Market Rent adjustments often lag behind real conditions. More frequent market evaluations and flexible payment standards would help preserve participation and maintain quality housing stock.

Response: Payment standards are established within federal guidelines and are tied to Fair Market Rent determinations. However, we do monitor market conditions and periodically review payment standards to help ensure they remain as competitive as possible within program requirements.

- c. Allow for more than one online portal log-in.

Response: The landlord portal is administered by our software provider, and account access settings are managed through that system. As a temporary solution, we recommend creating a shared or mutual email address that can be accessed by authorized users within your organization so multiple staff members can receive notifications and manage portal communications.

We understand the importance of flexibility for property management teams and will continue to share feedback with our software provider regarding additional access options.

- d. Some instruction for tenants on the following: Thermostat settings – get no higher than 70 degrees in winter and now lower than 72 degrees in the summer to save money and energy; When a windfall is received such as tax refund, try to use sensibly for emergency fund, car repairs etc.

Response: Thank you for the suggestion. While our program's primary role is to administer the Housing Choice Voucher and manage program compliance, we do not currently provide specific education related to thermostat settings, budgeting practices, or financial planning.

However, we encourage families to enroll in our Family Self-Sufficiency (FSS) program, which offers a wide range of classes and resources designed to support financial literacy, energy conservation, and other skills that help families maintain stable housing. Landlords are also welcome to provide guidance or resources directly to their tenants to further support these efforts.

- e. Don't have any suggestions – Always kept informed as to changes. Latisha Deacon did a great job on QC Inspection.
- f. The current organization has been very helpful.
- g. Well Managed
- h. I have not had any problems using the program it is easy to use.
- i. Continue to be respectful and kind and understanding to everyone's needs.

Response: Thank you for your positive feedback. We are glad to hear that your experience with the program has been smooth and that you feel well-informed about changes. We appreciate your recognition of our efforts to maintain a respectful, supportive, and well-managed program. Feedback like yours helps us continue providing high-quality service to landlords and participants alike.

- 4. *Please list any specific things that should be done to improve the quality of your customer service experience as a whole:*

- a. Return phone calls! Be responsive! Be available!

Response: We understand that timely responses are critical and acknowledge that returning calls and being available have been ongoing challenges. Please know that this issue is being actively addressed and monitored daily to improve responsiveness and ensure a better customer service experience for landlords and participants.

We appreciate your patience as we continue working to strengthen communication and availability across our team.

- b. We recommend additional incentives to encourage landlord participation, including damage mitigation funds and vacancy loss compensation during administrative delays. Balanced accountability between landlords and tenants is essential for a sustainable housing system.

Response: We recognize that incentives such as damage mitigation funds and vacancy loss compensation can be helpful in encouraging landlord participation. At this time, we are not able to offer additional incentives.

Please know that any administrative delays are addressed promptly when identified. We also recommend that landlords enforce their leases and conduct periodic inspections of their properties to help prevent significant damage and maintain quality housing.

- c. Assign property to one person and provide landlords with email and phone number.

Response: Each family in the program is assigned a dedicated point of contact, and we encourage landlords to use that contact for questions and updates. Due to the volume of landlords and tenants we manage, assigning a single staff member to each property is not feasible. However, we are working to ensure that all points of contact provide accurate and timely information, and that voicemail and email messages clearly indicate the correct staff member to reach for assistance.

- d. When I complete tenant recertification forms and ask for a rent increase, I usually receive no written response from the Housing Authority. I don't know if the rent increase was approved until I receive a new deposit amount in our bank.

Response: Rent acknowledgement letters are mailed once the rent increase has been processed. To ensure timely delivery, please confirm that we have your correct mailing address on file. You may also access updates in real time through the Landlord Portal by reaching out to our HCV staff for login assistance. This portal provides current information for each family, including the status of recertifications and rent adjustments, which can help reduce uncertainty while waiting for mailed notifications.

- e. Issue timely responses, communication and documentation. Proactively reach out with new client specialist contact information once any change occurs with a current one. Answer incoming calls!

Response: Our team is actively working to improve these areas, including ensuring that landlords are promptly informed whenever there is a change in their client specialist or point of contact.

We also continue to address issues with phone accessibility and encourage landlords to utilize their dedicated contacts and the Landlord Portal for updates.

- f. Everything has been good so far; no problems, very respectful.
- g. I have had only good experiences with the staff.
- h. None

- 5. *Is there anything that you would like to tell us about your interactions that you would like to see addressed in RRHA's Annual Plan or the Capital Fund 5 year Plan submission to HUD?*

- a. We used to have eight Section 8 tenants. We are down to one. We have terminated seven and are not accepting new ones. The process to get approved takes way too long. No one has a month for the inspectors and paper work to be completed.

Response: We understand that the inspection and approval process can feel lengthy, and we recognize the impact this may have on landlord participation. We work as quickly as possible; however, the process also requires full participation from both tenants and landlords, as well as accurate information, which can sometimes slow things down.

For more specific details regarding your property or tenant, please contact the HCV staff directly.

- b. We also encourage expanded tenant education and support services. Many lease compliance issues stem from misunderstandings rather than intent. Structured orientation and early intervention programs would help maintain stable tenancies and reduce preventable evictions.

Response: We agree that providing education and support to tenants can help prevent misunderstandings and support stable tenancies. While our program primarily focuses on administering the Housing Choice Voucher and managing compliance, we encourage participation in our Family Self-Sufficiency (FSS) program, which offers a range of classes and resources designed to support financial literacy, responsible tenancy, and other skills that contribute to long-term housing stability.

Landlords are also welcome to provide guidance or resources directly to their tenants to help reinforce lease compliance and prevent avoidable issues.

- c. All I am asking for is for Section 8 to do their job in a timely manner. I have been a strong proponent of Section 8 and telling other landlords that they should participate but am now questioning it. Right now I am looking to pull one of our houses out of your program due to the frustration.

Response: We understand that timely processing and responsiveness are critical to landlord participation, and we sincerely regret the frustration this has caused. Please know that our team is actively working to address delays and improve communication to make the program more efficient for landlords and tenants alike.

We value your past support and participation in the program, and we encourage you to reach out to the HCV staff directly with specific details about your property so we can address any outstanding issues as quickly as possible.

- d. Additional employee hiring, and additional employee education to promote retention, reduce case workload, and reduce prolonged response times.

Response: We agree however due to budget restrictions that's not possible at this time.

- e. Continue to help families that are in need to find a home
- f. In the past few months I have received excellent service from Starr Reynolds. The entire staff has been professional and helpful.
- g. None – system good

- h. I think that our current staff and administration have done a very capable job in managing RRHA.

Response: Thank you for your positive feedback. We are glad to hear that our staff have provided professional and helpful service. We also appreciate your recognition of our administration and overall program management.

We remain committed to helping families in need find and maintain safe, stable housing, and your kind words reinforce our efforts to provide excellent service to both landlords and participants.

Attachment D: PHA Plan Element – Challenged Elements

None

Attachment E: PHA Plan Element – Statement of Housing Needs and Strategy for Addressing Housing Needs

Housing Needs

Based on information in the City of Roanoke Consolidated Plan, the most common housing problems are extreme housing cost burdens and poor or deferred maintenance. These issues may result in homelessness, poor health conditions or temporary loss of housing. In addition, approximately 40% of households with a member who is elderly or disabled experience housing issues. The City has a large population of refugee families with 6 or more children per household, and these families often experience overcrowding, substandard housing, and extreme cost burdens. Further, low-income minority households are more adversely affected by housing issues. Hispanic and African-American households are disproportionately represented populations in the area of substandard housing. For those who earn less than 50% of AMI, Hispanic and Caucasian households suffer from disproportionately greater needs regarding housing cost burdens. Additionally, the City has a need to provide homeownership opportunities to extremely-low and very low-income households. The City of Roanoke Redevelopment and Housing Authority does not discriminate in admission or access to, or treatment or employment in, its federally assisted programs and activities on the basis of race, color, national origin, religion, sex (including pregnancy, childbirth, and related medical conditions), disability: physical or mental, age, genetic information and marital status. The City of Roanoke Redevelopment and Housing Authority identifies the VP of Operations as the 504 Coordinator, as the RRHA employee responsible for coordinating our efforts to comply with the nondiscrimination provisions set forth in 24 CFR Part 8. RRHA has taken initial and continuing steps to notify participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of disabilities in violation of this part.

Strategy for Addressing Housing Needs

RRHA plans to maximize the number of affordable units available by continuing to: 1) employ effective maintenance and management policies to minimize the number of vacant public housing units; 2) maintain low turnover time for vacated public housing units; 3) monitor HCV resources closely and issue vouchers to families on the waiting list as funding allows; 4) undertake measures to ensure access to affordable housing among families assisted by RRHA, regardless of unit size required; 5) maintain Section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration; 6) evaluate the need for project-based vouchers to ensure availability of sufficient high quality housing to meet identified housing needs and setting aside or seeking new vouchers for this purpose if needed; 7) use the repositioning study currently under contract and in process to evaluate the potential for RAD and other repositioning conversion methods for all public housing units, potentially applying to convert the whole portfolio while also prioritizing the chronology of developments; and 8) participate in the Consolidated Plan development process to ensure coordination with broader community strategies.

RRHA plans to continue working cooperatively with the City of Roanoke to provide opportunities for affordable housing development. RRHA plans to increase the number of affordable housing units by: 1) applying for additional Section 8 units should they become available; and 2) pursuing housing resources other than public housing or Section 8 tenant-based assistance. RRHA will continue to target available assistance to families at or below 30% or 50% of area median income (AMI) by adopting rent policies to support and encourage work and employing admissions preferences aimed at families who are working. RRHA will address housing needs of persons who are elderly or who have disabilities by applying for special-purpose vouchers targeted to persons who are elderly or families with disabilities, should they become available, and affirmatively marketing to local nonprofit agencies that assist persons who are elderly or families with disabilities. RRHA will address housing needs of families of races or ethnicities with disproportionate housing needs by affirmatively marketing to persons of races/ethnicities shown to have disproportionate housing needs. RRHA will affirmatively further fair housing by counseling Section 8 participants as to location of units outside of areas of poverty or minority concentration and assisting them to locate those units, and marketing the Section 8 program to owners outside of areas of poverty/minority concentrations. RRHA will also strive to increase housing options and decrease poverty concentration in planning for housing development. Approaches will include pursuit of mixed finance opportunities and the creation of mixed income communities by leveraging existing resources with market and other financial resources to address housing needs. In order to address the needs of persons who are in the target population of Virginia's Olmstead Settlement Agreement with the Department of Justice, RRHA sought HUD approval for a waiver to the Section 504 regulations and 24 C.F.R. §982.207(b) (3), allowing RRHA to offer preference for this specific population as a remedial measure to assist the Commonwealth of Virginia in complying with its Olmstead obligations. HUD approved the waiver request, and RRHA revised its Administrative Plan for the Housing Choice Voucher Program and set aside 10 vouchers from its existing pool to serve those individuals who meet the Olmstead

Settlement Agreement criteria. Selection policies have also been revised to reflect the addition of the preference for this specialized population. As an additional measure to prevent criminal activity and better meet housing needs by improving safety and security, RRHA has executed an intergovernmental agreement with the Roanoke City Police Department to provide above-baseline policing services at some public housing developments on certain days and times based on data regarding criminal activity and calls to police. RRHA implemented HUD's Final Rule for Smoke-Free Public Housing on July 1, 2018.

Attachment F: PHA Plan Element – Eligibility, Selection and Admission Policies, including Deconcentration and Wait List Procedures

Public Housing

(Chapter 4, Applications, Waiting List and Tenant Selection, pages 4-1 through 4-26, RRHA Admissions and Continued Occupancy Policy, approved by the RRHA Board of Commissioners on March 24, 2025)

APPLICATIONS, WAITING LIST AND TENANT SELECTION

INTRODUCTION

When a family wishes to reside in public housing, the family must submit an application that provides the PHA with the information needed to determine the family's eligibility. HUD requires the PHA to place all eligible families that apply for public housing on a waiting list. When a unit becomes available, the PHA must select families from the waiting list in accordance with HUD requirements and PHA policies as stated in its Admissions and Continued Occupancy Policy (ACOP) and its annual plan.

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

HUD regulations require that the PHA comply with all equal opportunity requirements, and it must affirmatively further fair housing goals in the administration of the program [24 CFR 960.103, PH Occ GB p. 13]. Adherence to the selection policies described in this chapter ensures that the PHA will be in compliance with all relevant fair housing requirements, as described in Chapter 2.

This chapter describes HUD and PHA policies for accepting applications, managing the waiting list, and selecting families from the waiting list. The PHA's policies for assigning unit size and making unit offers are contained in Chapter 5. Together, Chapters 4 and 5 of the ACOP comprise the PHA's Tenant Selection and Assignment Plan (TSAP).

The policies outlined in this chapter are organized into three sections, as follows:

Part I: The Application Process. This part provides an overview of the application process and discusses how applicants can obtain and submit applications. It also specifies how the PHA will handle the applications it receives.

Part II: Managing the Waiting List. This part presents the policies that govern how the PHA's waiting list is structured, when it is opened and closed, and how the public is notified of the opportunity to apply for public housing. It also discusses the process the PHA will use to keep the waiting list current.

Part III: Tenant Selection. This part describes the policies that guide the PHA in selecting families from the waiting list as units become available. It also specifies how in-person interviews will be used to ensure that the PHA has the information needed to make a final eligibility determination.

PART I: THE APPLICATION PROCESS

4-I.A. OVERVIEW

This part describes the policies that guide the PHA's efforts to distribute and accept applications, and to make preliminary determinations of applicant family eligibility that affect placement of the family on the waiting list. This part also describes the PHA's obligation to ensure the accessibility of the application process.

4-I.B. APPLYING FOR ASSISTANCE

Any family that wishes to reside in public housing must apply for admission to the program [24 CFR 1.4(b)(2)(ii), 24 CFR 960.202(a)(2)(iv), and PH Occ GB, p. 68]. HUD permits the PHA to determine the format and content of its applications, as well how such applications will be made available to interested families and how applications will be accepted by the PHA. However, the PHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the PHA's application [Notice PIH 2009-36].

Depending upon the length of time between the date of application and the availability of housing, the PHA may use a one- or two-step application process.

RRHA Policy

A one-step process will be used when it is expected that a family will be selected from the waiting list within 6 months of the date of application. At application, the family must provide all information necessary to establish family eligibility and the amount of rent the family will pay.

A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 6 months from the date of application. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all information necessary to establish family eligibility and the amount of rent the family will pay when selected from the waiting list.

RRHA has implemented a Web-Based Application System for its Public Housing Program. With limited exceptions, all applications must be submitted electronically. The online application can be accessed on RRHA's website <https://rkehousing.org> from any internet capable device (personal computer, cell phone, tablet, etc.) For applicants without internet access, RRHA will provide computer access at a number of Public Housing sites (listed below) where applications may be entered. Persons with disabilities or other persons lacking internet access or requiring special accommodations may contact the RRHA offices at 540-983-9281.

Lansdowne Park – 2624 Salem Turnpike NW

Indian Rock Village – 2034 Indian Village Lane, S.E.

Jamestown Place – 1533 Pike Lane, S.E.

The Villages at Lincoln – 1801 Dunbar Street, N.W.

If an exception has been made for a paper application, completed applications must be returned to the PHA by mail, or submitted in person during normal business hours.

Applications must be filled out completely in order to be accepted by the PHA for processing. If a paper application is incomplete, the PHA will notify the family of the additional information required.

4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

The PHA must take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the standard PHA application process.

Disabled Populations [24 CFR 8; PH Occ GB, p. 68]

The PHA must provide reasonable accommodation as needed for persons with disabilities to make the application process fully accessible. The facility where applications are accepted and the application process must be fully accessible, or the PHA must provide an alternate approach that provides equal access to the program. Chapter 2 provides a full discussion of the PHA's policies related to providing reasonable accommodations for people with disabilities.

Limited English Proficiency

PHAs are required to take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency [24 CFR 1]. Chapter 2 provides a full discussion on the PHA's policies related to ensuring access to people with limited English proficiency (LEP).

4-I.D. PLACEMENT ON THE WAITING LIST

The PHA must review each completed application received and make a preliminary assessment of the family's eligibility. Applicants for whom the waiting list is open must be placed on the waiting list unless the PHA determines the family to be ineligible. Where the family is determined to be ineligible, the PHA must notify the family in writing [24 CFR 960.208(a); PH Occ GB, p. 41].

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list.

Ineligible for Placement on the Waiting List

RRHA Policy

If the PHA determines from the information provided that a family is ineligible, the family will not be placed on the waiting list. When a family is determined to be ineligible, the PHA will send written notification of the ineligibility determination within 10 business days of receipt of the completed application. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal hearing and explain the process for doing so (see Chapter 14).

Eligible for Placement on the Waiting List

RRHA Policy

The PHA's web based application requires an email address for the family. If a family applies to the PHA web based waiting list, the family will receive a response at the end of the application process as acknowledgement. The family will be advised to keep the

response for their records and no other acknowledgement will be sent to the family. The PHA's web based application will not provide a response of receipt unless all required fields or questions have been answered. The family can log into the application and update its address, telephone or email information.

If an exception has been made for a paper application, the PHA will send written notification of the preliminary eligibility determination within 10 business days of receiving a completed application. If applicable, the notice will also indicate the waiting list preference(s) for which the family appears to qualify.

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

The PHA will assign families on the waiting list according to the bedroom size for which a family qualifies as established in its occupancy standards (see Chapter 5). Families may request to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines (as long as the unit is not overcrowded according to PHA standards and local codes). However, in these cases, the family must agree not to request a transfer for two years after admission, unless they have a change in family size or composition.

Placement on the waiting list does not indicate that the family is, in fact, eligible for admission. When the family is selected the PHA will verify any preference(s) claimed and determine eligibility and suitability for admission to the program.

PART II: MANAGING THE WAITING LIST

4-II.A. OVERVIEW

The PHA must have policies regarding the type of waiting list it will utilize as well as how the waiting list will be organized and managed. This includes policies on notifying the public on the opening and closing of the waiting list to new applicants, updating family information, purging the list of families that are no longer interested in or eligible for public housing, and conducting outreach to ensure a sufficient number of applicants.

In addition, HUD imposes requirements on how the PHA may structure its waiting list and how families must be treated if they apply for public housing at a PHA that administers more than one assisted housing program.

4-II.B. ORGANIZATION OF THE WAITING LIST

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

RRHA Policy

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

Name and social security number of head of household

Unit size required (number of family members)

Amount and source of annual income

Accessibility requirement, if any

Date and time of application or application number

Household type (family, elderly, disabled)

Admission preference, if any

The PHA has adopted site-based waiting lists. Site-based waiting lists allow families to select the development where they wish to reside and must be consistent with all applicable civil rights and fair housing laws and regulations [24 CFR 903.7(b)(2)].

The PHA will maintain site-based waiting lists for each of the following sites within RRHA's public housing stock:

- Lansdowne Park
- The Villages at Lincoln
- New Construction Lease/Purchase
- Hunt Manor
- Melrose Towers
- Jamestown Place
- Morningside Manor
- Bluestone Park
- Indian Rock Village
- Substantial Rehab (Scattered Sites)

Each site-based wait list will be maintained at each location. Within each site-based wait list all applications will be kept in sequence based upon the type and size of unit, preferences, and date and time of application.

The PHA may adopt one community-wide waiting list or site-based waiting lists. The PHA must obtain approval from HUD through submission of its Annual Plan before it may offer site-based waiting lists. Site-based waiting lists allow families to select the development where they wish to reside and must be consistent with all applicable civil rights and fair housing laws and regulations [24 CFR 903.7(b)(2)].

HUD requires that public housing applicants must be offered the opportunity to be placed on the waiting list for any tenant-based or project-based voucher or moderate rehabilitation program that the PHA operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs [24 CFR 982.205(a)(2)(i)].

HUD permits, but does not require, that PHAs maintain a single merged waiting list for their public housing, Section 8, and other subsidized housing programs [24 CFR 982.205(a)(1)].

RRHA Policy

The PHA will not merge the public housing waiting list with the waiting list for any other program the PHA operates.

4-II.C. OPENING AND CLOSING THE WAITING LIST

Closing the Waiting List

The PHA is permitted to close the waiting list, in whole or in part, if it has an adequate pool of families to fully lease units in all its developments. The PHA may close the waiting list completely, or restrict intake by preference, type of project, or by size and type of dwelling unit. [PH Occ GB, p. 31].

RRHA Policy

The PHA will close the waiting list when the estimated waiting period for housing applicants on the list reaches 24 months for the most current applicants. Where the PHA has particular preferences or other criteria that require a specific category of family, the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

Reopening the Waiting List

If the waiting list has been closed, it may be reopened at any time. The PHA should publish a notice announcing the opening of the waiting list in local newspapers of general circulation, minority media, and other suitable media outlets. Such notice must comply with HUD fair housing requirements. The PHA should specify who may apply, and where and when applications will be received.

RRHA Policy

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

The notice will inform applicants of the date, time, method, and place applications can be obtained and submitted, how blank applications may be obtained (e.g., from what addresses, community sites, and websites), all methods by which applications will be accepted (e.g., in person, by phone, by fax, by email), a point of contact who can answer questions, any limitations on who may apply, and any other information the applicant may need to successfully submit the application. The PHA will describe its prioritization system or whether it uses a lottery and will clearly state that this system will be used to place applicants on the waiting list.

To ensure that public notices broadly reach potential applicants in all communities throughout the housing market area, the PHA will distribute public notices to local community-based organizations, such as social service agencies and religious institutions; distribute the notice online through the PHA's website or social media platforms and other online platforms for local housing news; and make use of any local newspapers of general circulation, minority media, and other suitable means.

The PHA will give public notice by publishing the relevant information using the following media outlets:

Roanoke Times

Roanoke Tribune

4-II.D. FAMILY OUTREACH [24 CFR 903.2(d); 24 CFR 903.7(a) and (b)]

The PHA should conduct outreach as necessary to ensure that the PHA has a sufficient number of applicants on the waiting list to fill anticipated vacancies and to assure that the PHA is affirmatively furthering fair housing and complying with the Fair Housing Act.

Because HUD requires the PHA to admit a specified percentage of extremely low-income families, the PHA may need to conduct special outreach to ensure that an adequate number of such families apply for public housing.

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

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

PHA outreach efforts must be designed to inform qualified families about the availability of units under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers
- Developing informational materials and flyers to distribute to other agencies
- Providing application forms to other public and private agencies that serve the low income population
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

RRHA Policy

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

After preferences have been applied, the PHA will use date and time to place families on the waiting list. Applications will be accepted for a designated period of time as specified in the announcement notice. Preferences and/or date and time will determine the position of each applicant.

4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

RRHA Policy

While the family is on the waiting list, the family must inform the PHA, within 10 business days, of changes in family size or composition, preference status, or contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing.

Changes in an applicant's circumstances while on the waiting list may affect the family's qualification for a particular bedroom size or entitlement to a preference. When an applicant reports a change that affects their placement on the waiting list, the waiting list will be updated accordingly.

4-II.F. UPDATING THE WAITING LIST

HUD requires the PHA to establish policies that describe the circumstances under which applicants will be removed from the waiting list [24 CFR 960.202(a)(2)(iv)].

Purging the Waiting List

The decision to remove an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to the PHA's request for information or updates because of the family member's disability, the PHA must, upon the family's request, reinstate the applicant family to their former position on the waiting list as a reasonable accommodation [24 CFR 8.4(a), 24 CFR 100.204(a), and PH Occ GB, p. 39 and 40]. See Chapter 2 for further information regarding reasonable accommodations.

RRHA Policy

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

To update the waiting list, the PHA will send an update request via first class mail or email to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program.

This update request will be sent to the last address or email that the PHA has on record for the family as well as any additional contact methods identified by the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's response must be in writing and may be delivered in person, by mail, by email, or by fax. Responses should be postmarked or received by the PHA not later than 15 business days from the date of the PHA letter. If the 15th day falls on a weekend or a holiday, the document must be received by the next business day.

If the family fails to respond within 15 business days, the family will be removed from the waiting list without further notice.

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

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 15 business days to respond from the date

the letter was re-sent. If the family fails to respond within this time frame, the family will be removed from the waiting list without further notice.

When a family is removed from the waiting list during the update process for failure to respond, the PHA will contact an unresponsive applicant through all means available, including first class mail, telephone, or email. The PHA will give that family a reasonable period of time to respond with their interest so as to not inadvertently remove an applicant who remains interested but may have moved, changed their contact information, or otherwise are difficult to reach. No informal hearing will be offered in such cases. Such failures to act on the part of the applicant prevent the PHA from making an eligibility determination; therefore, no informal hearing is required.

If a family is removed from the waiting list for failure to respond, the PHA may reinstate the family if the lack of response was due to PHA error, to circumstances beyond the family's control, as a result of a family member's disability, or as a direct result of status as a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, including an adverse factor resulting from such abuse.

Applicants are notified with confirmation of RRHA's receipt of their application that they are responsible for notifying RRHA within 10 calendar days, if they have a change of address.

Removal from the Waiting List

RRHA Policy

The PHA will remove an applicant from the waiting list upon request by the applicant family. In such cases no informal hearing is required.

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

If an applicant fails to keep their initial appointment and fails to notify RRHA prior to the scheduled appointment, of his/her inability to keep an appointment, his/her name will be withdrawn from the waiting list. A statement to this effect will appear on the forms used by RRHA that advise applicants of scheduled interviews.

If a family is removed from the waiting list because the PHA has determined the family is not eligible for admission, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal hearing regarding the PHA's decision (see Chapter 14) [24 CFR 960.208(a)].

PART III: TENANT SELECTION

4-III.A. OVERVIEW

The PHA must establish tenant selection policies for families being admitted to public housing [24 CFR 960.201(a)]. The PHA must not require any specific income or racial quotas for any developments [24 CFR 903.2(d)]. The PHA must not assign persons to a particular section of a community or to a development or building based on race, color, religion, sex, disability, familial

status or national origin for purposes of segregating populations [24 CFR 1.4(b)(1)(iii) and 24 CFR 903.2(d)(1)].

The order in which families will be selected from the waiting list depends on the selection method chosen by the PHA and is impacted in part by any selection preferences that the family qualifies for. The availability of units also may affect the order in which families are selected from the waiting list.

The PHA must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 960.206(e)(2)]. The PHA's policies must be posted any place where the PHA receives applications. The PHA must provide a copy of its tenant selection policies upon request to any applicant or tenant. The PHA may charge the family for providing a copy of its tenant selection policies [24 CFR 960.202(c)(2)].

RRHA Policy

When an applicant or resident family requests a copy of the PHA's tenant selection policies, the PHA will provide copies to them free of charge.

4-III.B. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use.

Local Preferences [24 CFR 960.206]

PHAs are permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

If the PHA has a Housing Choice Voucher program, the PHA must offer, and if accepted, provide the family a selection preference for an appropriate-sized public housing unit that first becomes available for occupancy after the time period expires for an HCV family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who are unable to lease a new unit within the term of the voucher [24 CFR 982.404(e)(2)].

RRHA Policy

Local preferences will be aggregated using a system in which each preference will receive an allocation of points. The more preference points an applicant has, the higher the applicant's place on the waiting list.

The PHA will use the following local preferences:

Residency Preference – 3 Points: Families who live, work or have been hired to work in the City of Roanoke, VA without regard to any minimum period of duration.

Homeless Preference Continuum of Care (CoC) – 2 Points: Homeless residents who reside in the City of Roanoke and are referred to the PHA by the CoC provider with whom the PHA has executed a Memorandum of Understanding (MOU). The MOU must have outlined the CoC's responsibilities with respect to the provision of supportive services for

the referred household in order for the applicant to be eligible for this preference. The PHA must have:

- 1) received a written commitment from the CoC to offer supportive services on an as needed basis to help the household transition from homelessness to permanent housing, *and*
- 2) received a written commitment from the CoC to offer supportive services to help the household maintain their assisted housing and comply with lease obligations.

Under the Homeless CoC referral, the PHA will assign a Homeless CoC preference to applicants who meet the HUD Category One (1) definition of homelessness:

- Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning;
 1. Has a primary nighttime residence that is a public or private place not meant for human habitation; **or**
 2. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); **or**
 3. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

The PHA currently partners with the Blue Ridge Continuum of Care, with whom the PHA has a Memorandum of Understanding.

Homeless Preference Without CoC Referral– 1 Point: The PHA must be able to verify that the applicant has a definitive connection to the City of Roanoke, such as being homeless in a shelter in the city of Roanoke. An example would be enrollment at the Rescue Mission of Roanoke or Roanoke Area Ministries (RAM).

- Includes a person or family who is living in a place that is not intended for permanent housing (i.e. vehicle, tent, motel, park or temporary housing shelter) or whose family is significantly under housed
- Includes the imminent threat of homelessness due to displacement from any structure meant for habitation, such as a trailer or mobile home that is determined by the PHA or local code enforcement agency as no longer fit for habitation

Working Families Preference – 1 Point: In order to bring higher income families into public housing, RRHA will offer a preference for “working” families, where the head, spouse/co-head, or sole member is employed at least 20 hours per week. As required by HUD the Working Families Preference refers to a families where the head AND spouse, or sole member is a person age 62 or older, or is a person with disabilities, will also be given the benefit of the working preference [24 CFR 960.206(b)(2)].

Example 1: Head of household is elderly but does not work. There is no spouse or cohead. This family receives benefit of the working preference.

Example 2: Head of household is 64, spouse is disabled. Neither work. This family receives benefit of the working preference.

Example 3: Head of household is 63, spouse is neither elderly nor disabled. Neither work. This family does NOT receive benefit of the working preference since both the head of household and spouse (or cohead) must be elderly and/or disabled to receive benefit of the working preference, unless one is currently working at least 20 hours a week.

Among applicants who qualify for the same number of preference points, date and time of application will be used to determine placement on the waiting list.

Income Targeting Requirement [24 CFR 960.202(b)]

HUD requires that extremely low-income (ELI) families make up at least 40 percent of the families admitted to public housing during the PHA's fiscal year. ELI families are those with annual incomes at or below the federal poverty level or 30 percent of the area median income, whichever number is higher [*Federal Register* notice 6/25/14]. To ensure this requirement is met, the PHA may skip non-ELI families on the waiting list in order to select an ELI family.

If a PHA also operates a housing choice voucher (HCV) program, admissions of extremely low-income families to the PHA's HCV program during a PHA fiscal year that exceed the 75 percent minimum target requirement for the voucher program, shall be credited against the PHA's basic targeting requirement in the public housing program for the same fiscal year. However, under these circumstances the fiscal year credit to the public housing program must not exceed the lower of: (1) ten percent of public housing waiting list admissions during the PHA fiscal year; (2) ten percent of waiting list admissions to the PHA's housing choice voucher program during the PHA fiscal year; or (3) the number of qualifying low-income families who commence occupancy during the fiscal year of PHA public housing units located in census tracts with a poverty rate of 30 percent or more. For this purpose, qualifying low-income family means a low-income family other than an extremely low-income family.

RRHA Policy

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

Mixed Population Developments [24 CFR 960.407]

A mixed population development is a public housing development or portion of a development that was reserved for elderly families and disabled families at its inception (and has retained that character) or the PHA at some point after its inception obtained HUD approval to give preference in tenant selection for all units in the development (or portion of a development) to elderly and disabled families [24 CFR 960.102]. Elderly family means a family whose head, spouse, cohead, or sole member is a person who is at least 62 years of age. Disabled family means a family whose head, spouse, cohead, or sole member is a person with disabilities [24 CFR 5.403]. The PHA must give elderly and disabled families equal preference in selecting these families for admission to mixed population developments. The PHA may not establish a limit on the number of elderly or disabled families that may occupy a mixed population development. In selecting elderly and disabled families to fill these units, the PHA must first offer the units that have accessibility features for families that include a person with a disability and require the accessibility features of such

units. The PHA may not discriminate against elderly or disabled families that include children (Fair Housing Amendments Act of 1988).

Units Designated for Elderly or Disabled Families [24 CFR 945]

The PHA may designate projects or portions of a public housing project specifically for elderly or disabled families. The PHA must have a HUD-approved allocation plan before the designation may take place.

Among the designated developments, the PHA must also apply any preferences that it has established. If there are not enough elderly families to occupy the units in a designated elderly development, the PHA may allow near-elderly families to occupy the units [24 CFR 945.303(c)(1)]. Near-elderly family means a family whose head, spouse, or cohead is at least 50 years old, but is less than 62 [24 CFR 5.403].

If there are an insufficient number of elderly families and near-elderly families for the units in a development designated for elderly families, the PHA must make available to all other families any unit that is ready for re-rental and has been vacant for more than 60 consecutive days [24 CFR 945.303(c)(2)].

The decision of any disabled family or elderly family not to occupy or accept occupancy in designated housing shall not have an adverse affect on their admission or continued occupancy in public housing or their position on or placement on the waiting list. However, this protection does not apply to any family who refuses to occupy or accept occupancy in designated housing because of the race, color, religion, sex, disability, familial status, or national origin of the occupants of the designated housing or the surrounding area [24 CFR 945.303(d)(1) and (2)].

This protection does apply to an elderly family or disabled family that declines to accept occupancy, respectively, in a designated project for elderly families or for disabled families, and requests occupancy in a general occupancy project or in a mixed population project [24 CFR 945.303(d)(3)].

RRHA Policy

The PHA does have designated elderly or designated disabled public housing .

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

The PHA'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 the PHA's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

The PHA'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: 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.

RRHA 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.

RRHA 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 (federal poverty level or 30 percent of median income, whichever number is higher).

Step 4. The PHA 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.

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 deconcentration of poverty and income mixing.

Depending on local circumstances the PHA'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 in an effort to further the goals of deconcentration
- 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 deconcentration 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 deconcentration 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 deconcentration requirement and no further action is required.

RRHA Policy

For covered developments with average incomes outside the Established Income Range where RRHA explains and/or justifies the income profile for these developments as being consistent with and furthering two sets of goals: the goals of deconcentration of poverty and income mixing as specified by the statute (bringing higher income tenants into lower income developments and vice versa); and the local goals and strategies contained in the RRHA Annual Plan, RRHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

For covered developments outside the EIR where RRHA is unable to explain or justify the income profile for these developments as being consistent with and furthering the two sets of goals cited in the paragraph above, RRHA will take the following actions to provide for deconcentration of poverty and income mixing:

- For the purpose of income mixing, site-based waiting list applicants will be referred to other developments, when family incomes are contradictory to the income mix of the development.
- The on-site manager will make housing offers.
- RRHA will deconcentrate high income and very low income families in the same area by offering incentives to residents to relocate to lower income developments or higher income developments, such as:
 - Providing funds for moving expenses incurred by the resident.
 - Rent credit for one month.
 - Bedroom size change (diversion from Occupancy Standard)/
 - Free gifts.

RRHA will encourage site-based waiting list applicants and existing resident families to move to other developments to prevent concentration of lower or higher income families in the same development. However, the family will retain the choice of accepting the offer to move.

RRHA will maintain leasing statistics by property as well as for the Authority as a whole. These statistics will be for Public Housing and Section 8 programs. This will make it possible to demonstrate the effectiveness of our plan, as well as our success in achieving a range of incomes at all properties. The records include, but are not limited to the following:

- Annual income for all new admissions.
- Average family rent payment
- Incentives provided.

- Families relocated to promote deconcentration/income mixing

Monthly statistical information to monitor percentage compliance with HUD income targeting regulations.

Order of Selection [24 CFR 960.206(e)]

The PHA system of preferences may select families either according to the date and time of application or by a random selection process.

RRHA Policy

Families will be selected from the waiting list based on preference points. Among applicants with the same preference points, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA.

When selecting applicants from the waiting list, the PHA will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. The PHA will offer the unit to the highest-ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status.

Factors such as deconcentration or income mixing and income targeting will also be considered in accordance with HUD requirements and PHA policy.

4-III.C. NOTIFICATION OF SELECTION

When the family has been selected from the waiting list, the PHA must notify the family [24 CFR 960.208].

RRHA Policy

The PHA will notify the family by first class mail or email when it is selected from the waiting list.

The notice will inform the family of the following:

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

Who is required to attend the interview

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

Documents that must be provided at the interview to document eligibility for a preference, if applicable

Other documents and information that should be brought to the interview

If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list without further notice unless a person with a disability requests a reasonable accommodation for being unable to reply within the prescribed period. Such failure to

act on the part of the applicant prevents the PHA from making an eligibility determination; therefore no informal hearing will be offered.

4-III.D. THE APPLICATION INTERVIEW

HUD recommends that the PHA obtain the information and documentation needed to make an eligibility determination through a private interview. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if the PHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period of time determined by the PHA [Notice PIH 2018-24].

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability [24 CFR 8.4(a) and 24 CFR 100.204(a)].

RRHA Policy

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

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability [24 CFR 8.4(a) and 24 CFR 100.204(a)].

All adult family members must attend the interview and sign the housing application. Exceptions may be made for adult students attending school out of state or for members for whom attendance would be a hardship.

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

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

Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for 30 days. If all household members have not disclosed their SSNs at the next time a unit becomes available, the PHA will offer a unit to the next eligible applicant family on the waiting list.

If the family is claiming a waiting list preference, the family must provide documentation to verify their eligibility for a preference (see Chapter 7). If the family is verified as eligible for the preference, the PHA will proceed with the interview. If the PHA determines the family is not eligible for the preference, the interview will not proceed, and the family will be placed back on the waiting list according to the date and time of their application.

The family must provide the information necessary to establish the family's eligibility, including suitability, and to determine the appropriate amount of rent the family will pay. The family must also complete required forms, provide required signatures, and submit

required documentation. If any materials are missing, the PHA will provide the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (see Chapter 3).

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

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

If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, the PHA will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without PHA approval will have their applications made inactive based on the family's failure to supply information needed to determine eligibility. The second appointment letter will state that failure to appear for the appointment without a request to reschedule will be interpreted to mean that the family is no longer interested, and their application will be made inactive. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination, therefore the PHA will not offer an informal hearing.

4-III.E. FINAL ELIGIBILITY DETERMINATION [24 CFR 960.208]

The PHA must verify all information provided by the family (see Chapter 7). Based on verified information related to the eligibility requirements, including PHA suitability standards, the PHA must make a final determination of eligibility (see Chapter 3).

When a determination is made that a family is eligible and satisfies all requirements for admission, including tenant selection criteria, the applicant must be notified of the approximate date of occupancy insofar as that date can be reasonably determined [24 CFR 960.208(b)].

RRHA Policy

The PHA will notify a family in writing of their eligibility within 10 business days of the determination and will provide the approximate date of occupancy insofar as that date can be reasonably determined.

The PHA will expedite the administrative process for determining eligibility to the extent possible for applicants who are admitted to the public housing program as a result of an emergency transfer from another PHA program.

The PHA must promptly notify any family determined to be ineligible for admission of the basis for such determination, and must provide the applicant upon request, within a reasonable time after the determination is made, with an opportunity for an informal hearing on such determination [24 CFR 960.208(a)].

RRHA Policy

If the PHA determines that the family is ineligible, the PHA will send written notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal hearing (see Chapter 14).

If the PHA uses a criminal record or sex offender registration information obtained under 24 CFR 5, Subpart J, as the basis of a denial, a copy of the record must precede the notice to deny, with an opportunity for the applicant to dispute the accuracy and relevance of the information before the PHA can move to deny the application. See Section 3-III.G for the PHA's policy regarding such circumstances.

The PHA must provide the family a notice of VAWA rights (form HUD-5380) as well as the HUD VAWA self-certification form (form HUD-5382) in accordance with the Violence against Women Act, and as outlined in 16-VII.C, at the time the applicant is provided assistance or at the time the applicant is denied assistance. This notice must be provided in both of the following instances: (1) when a family actually begins receiving assistance (lease execution); or (2) when a family is notified of its ineligibility.

Section 8

(Chapter 4, Applications, Waiting List and Tenant Selection, pages 4-1 through 4-21, RRHA Section 8 Administrative Plan, approved by the RRHA Board of Commissioners on October 27, 2025)

APPLICATIONS, WAITING LIST AND TENANT SELECTION

INTRODUCTION

When a family wishes to receive assistance under the HCV program, the family must submit an application that provides the PHA with the information needed to determine the family's eligibility. HUD requires the PHA to place all families that apply for assistance on a waiting list. When HCV assistance becomes available, the PHA must select families from the waiting list in accordance with HUD requirements and PHA policies as stated in the administrative plan and the annual plan.

The PHA is required to adopt clear policies and procedures for accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow these policies and procedures consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or the PHA that justify their selection. Examples of this are the selection of families for income targeting and the selection of families that qualify for targeted funding.

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

This chapter describes HUD and PHA policies for taking applications, managing the waiting list and selecting families for HCV assistance. The policies outlined in this chapter are organized into three sections, as follows:

Part I: The Application Process. This part provides an overview of the application process, and discusses how applicants can obtain and submit applications. It also specifies how the PHA will handle the applications it receives.

Part II: Managing the Waiting List. This part presents the policies that govern how the PHA's waiting list is structured, when it is opened and closed, and how the public is notified of the opportunity to apply for assistance. It also discusses the process the PHA will use to keep the waiting list current.

Part III: Selection for HCV Assistance. This part describes the policies that guide the PHA in selecting families for HCV assistance as such assistance becomes available. It also specifies how in-person interviews will be used to ensure that the PHA has the information needed to make a final eligibility determination.

PART I: THE APPLICATION PROCESS

4-I.A. OVERVIEW

This part describes RRHA's policies for making applications available, accepting applications, making preliminary determinations of eligibility, and the placement of applicants on the waiting list. This part also describes RRHA's obligation to ensure the accessibility of the application process to elderly persons, people with disabilities, and people with limited English proficiency (LEP).

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

Any family that wishes to receive HCV assistance must apply for admission to the program. HUD permits RRHA to determine the format and content of HCV applications, as well how such applications will be made available to interested families and how applications will be accepted by RRHA. However, RRHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of RRHA's application.

RRHA Policy

Depending upon the length of time that applicants may need to wait to receive assistance, RRHA may use a one- or two-step application process.

A one-step process will be used when it is expected that a family will be selected from the waiting list within 60 days of the date of application. At application, the family must provide all of the information necessary to establish family eligibility and level of assistance.

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

RRHA has implemented a Web-Based Application System for its Housing Choice Voucher Program. With limited exceptions, all Preliminary Applications must be submitted electronically. The on-line Application can be accessed on RRHA's website www.rkehousing.org from any Internet capable device (personal computer, cell phone, tablet, etc.). For applicants without Internet access, RRHA will provide computer access at a number of Public Housing sites (listed below) where applications may be entered. Disabled, handicapped or other disadvantaged persons without Internet access or requiring special accommodations may contact the RRHA offices at 540-983-9281.

Lansdowne Park – 2624 Salem Turnpike NW

Indian Rock Village – 2034 Indian Village Lane, S.E.

Jamestown Place – 1533 Pike Lane, S.E.

Villages at Lincoln – 1801 Dunbar Street, N.W.

PRELIMINARY APPLICATION UPDATES

After being placed in the Lottery Pool, applicants are responsible for reporting changes in family circumstances (addresses, income, family composition, etc.) electronically via the Applicant Information Update feature on the RRHA Website. This information will be used to re-evaluate the assignment of provisional Admission Preference Points. Failure to provide accurate information may result in failure to be added to the Wait List or to qualify for Voucher issuance.

4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

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

RRHA must take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the normal, standard RRHA application process. This could include people with disabilities, certain elderly individuals, as well as persons with limited English proficiency (LEP). RRHA must provide reasonable accommodation to the needs of individuals with disabilities. The application-taking facility and the application process must be fully accessible, or RRHA must provide an alternate approach that provides full access to the application process. Chapter 2 provides a full discussion of RRHA's policies related to providing reasonable accommodations for people with disabilities.

Limited English Proficiency

RRHA is required to take reasonable steps to ensure equal access to their programs and activities by persons with limited English proficiency [24 CFR 1]. Chapter 2 provides a full discussion on RRHA's policies related to ensuring access to people with limited English proficiency (LEP).

4-I.D. PLACEMENT ON THE WAITING LIST

The PHA must review each complete application received and make a preliminary assessment of the family's eligibility. The PHA must accept applications from families for whom the list is open unless there is good cause for not accepting the application (such as denial of assistance) for the grounds stated in the regulations [24 CFR 982.206(b)(2)]. Where the family is determined to be ineligible, the PHA must notify the family in writing [24 CFR 982.201(f)]. Where the family is not determined to be ineligible, the family will be placed on a waiting list of applicants.

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

Ineligible for Placement on the Waiting List

RRHA Policy

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

Eligible for Placement on the Waiting List

RRHA Policy

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

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

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

PART II: MANAGING THE WAITING LIST

4-II.A. OVERVIEW

The PHA must have policies regarding various aspects of organizing and managing the waiting list of applicant families. This includes opening the list to new applicants, closing the list to new applicants, notifying the public of waiting list openings and closings, updating waiting list information, purging the list of families that are no longer interested in or eligible for assistance, as well as conducting outreach to ensure a sufficient number of applicants.

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

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

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

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

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

HUD requires the PHA to maintain a single waiting list for the HCV program unless it serves more than one county or municipality. Such PHAs are permitted, but not required, to maintain a separate waiting list for each county or municipality served.

RRHA Policy

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

HUD directs that a family that applies for assistance from the HCV program must be offered the opportunity to be placed on the waiting list for any public housing, project-based voucher or moderate rehabilitation program the PHA operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs.

HUD permits, but does not require, that PHAs maintain a single merged waiting list for their public housing, Section 8, and other subsidized housing programs.

A family's decision to apply for, receive, or refuse other housing assistance must not affect the family's placement on the HCV waiting list, or any preferences for which the family may qualify.

RRHA Policy

The PHA will not merge the HCV waiting list with the waiting list for any other program the PHA operates.

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

Closing the Waiting List

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

RRHA Policy

RRHA will close the waiting list when the estimated waiting period for housing assistance for applicants on the list reaches 24 months for the most current applicants. Where the PHA has particular preferences or funding criteria that require a specific category of family, the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

Reopening the Waiting List

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

RRHA Policy

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

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

Roanoke Times, Roanoke Tribune, Public Service Announcements on local radio stations, Department of Social Services, Total Action for Progress, Salvation Army, Rescue Mission, RAM House, Trust, Public Service Announcements on the government access cable channel, Blue Ridge Center for Independent Living and Blue Ridge Behavioral Health Care

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

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

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

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

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

PHA outreach efforts must be designed to inform qualified families about the availability of assistance under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers
- Developing informational materials and flyers to distribute to other agencies
- Providing application forms to other public and private agencies that serve the low income population
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

RRHA Policy

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

4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

RRHA Policy

While the family is on the waiting list, the family must immediately inform RRHA of changes in contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing. RRHA encourages the applicants to use RRHA's web based waitlist program and provide all updates on line.

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

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

Purging the Waiting List

The decision to withdraw an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to a RRHA request for information or updates, and RRHA determines that the family did not respond because

of the family member's disability, RRHA must reinstate the applicant family to their former position on the waiting list [24 CFR 982.204(c)(2)].

RRHA Policy

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

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

The family's response must be in writing and may be delivered in person, by mail, by email, or by fax. Responses should be postmarked or received by the PHA not later than 15 business days from the date of the PHA letter.

If the family fails to respond within 15 business days, the family will be removed from the waiting list without further notice.

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

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 15 business days to respond from the date the letter was re-sent.

If a family is removed from the waiting list for failure to respond, the PHA may reinstate the family if it is determined that the lack of response was due to PHA error, or to circumstances beyond the family's control, as a result of a family member's disability, or as a direct result of status as a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, including an adverse factor resulting from such abuse.

Removal from the Waiting List

RRHA Policy

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

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

PART III: SELECTION FOR HCV ASSISTANCE

4-III.A. OVERVIEW

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

The order in which families are selected from the waiting list depends on the selection method chosen by the PHA and is impacted in part by any selection preferences for which the family qualifies. The availability of targeted funding also may affect the order in which families are selected from the waiting list.

The PHA must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 982.204(b) and 982.207(e)].

4-III.B. SELECTION AND HCV FUNDING SOURCES

Special Admissions [24 CFR 982.203]

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

Targeted Funding [24 CFR 982.204(e)]

HUD may award a PHA funding for a specified category of families on the waiting list. The PHA must use this funding only to assist the families within the specified category. In order to assist families within a targeted funding category, the PHA may skip families that do not qualify within the targeted funding category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

RRHA Policy

The PHA administers the following types of targeted funding:

Fairshare, HUD-VASH, Family Unification Program, Mainstream Housing Choice Voucher, Virginia's Olmstead Settlement Agreement with the U.S. Department of Justice (DOJ)

Regular HCV Funding

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

4-III.C. SELECTION METHOD

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

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

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

RRHA Policy

The PHA will use the following local preferences:

1. The PHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding.
2. The PHA will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking who have either been referred by a partnering service agency or consortia or are seeking an emergency transfer under VAWA from the PHA's public housing program or other covered housing program operated by the PHA.

The PHA will work with the following partnering service agencies:

[Insert name(s) of agencies]

The applicant must certify that the abuser will not reside with the applicant unless the PHA gives prior written approval.

The PHA will first assist families that have been terminated from the HCV program due to insufficient funding and then assist families that qualify for the VAWA preference.

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

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

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

RRHA Policy

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

Order of Selection

The PHA system of preferences may select families based on local preferences according to the date and time of application or by a random selection process (lottery) [24 CFR 982.207(c)]. If a PHA does not have enough funding to assist the family at the top of the waiting list, it is not permitted to skip down the waiting list to a family that it can afford to subsidize when there are not sufficient funds to subsidize the family at the top of the waiting list [24 CFR 982.204(d) and (e)].

RRHA Policy

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

4-III.D. NOTIFICATION OF SELECTION

When a family has been selected from the waiting list, the PHA must notify the family [24 CFR 982.554(a)].

RRHA Policy

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

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

- Who is required to attend the interview

- All documents that must be provided at the interview, including information about what constitutes acceptable documentation

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

4-III.E. THE APPLICATION INTERVIEW

HUD recommends that the PHA obtain the information and documentation needed to make an eligibility determination through a face-to-face interview with a PHA representative [HCV GB, pg. 4-16]. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if the PHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period of time determined by the PHA [Notice PIH 2018-24].

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability.

RRHA Policy

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

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

The head of household or spouse/cohead must provide acceptable documentation of legal identity. (Chapter 7 provides a discussion of proper documentation of legal identity.) If the family representative does not provide the required documentation at the time of the interview, they will be required to provide it within 10 business days.

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

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

Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).

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

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

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

4-III.F. COMPLETING THE APPLICATION PROCESS

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

RRHA Policy

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

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

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

Attachment G: PHA Plan Element – Financial Resources

Statement of Financial Resources

[24 CFR Part 903.7 9 (b)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

Financial Resources: 2026 Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY2025 grants)		
a) Public Housing Operating Fund	\$ 6,600,000	PH Operations
b) Public Housing Capital Fund	\$ 4,700,000	PH Cap. Improvements
c)	\$	
d)	\$	
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$ 20,000,000	Section 8 Rental Assistance
f) Resident Opportunity and Self-Sufficiency Grants	\$ 175,000	Supportive Services
g) FSS Grants	\$ 198,000	Public Housing Supportive Services
h) Community Development Block Grant	\$	CDBG Loan Program Administration
i) HOME		
j)	\$	
k)		
l)	\$	
m)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
Capital Fund and RFP	\$ 3,400,000	PH Cap. Improvements
JOBS Plus	\$ 440,000	PH Supportive Srvcs.
3. Public Housing Dwelling Rental Income	\$ 4,100,000	PH Operations
4. Other income (list below)		

**Financial Resources: 2026
Planned Sources and Uses**

Sources	Planned \$	Planned Uses
Other Tenant Revenue	\$ 350,000	Public Housing Operations
	\$	
	\$	
5. Non-federal sources (list below)		
VA Housing Grant	\$	
Total resources	\$ 39,963,000	

Attachment H: PHA Plan Element – Rent Determination

Public Housing

(Chapter 6.A., Part III, Calculating Rent, pages 6a-53 through 6a-4, and Chapter 6.B., Part IV, Calculating Rent, pages 6b-61 through 6b-73, RRHA Admissions and Continued Occupancy Policy, approved by the RRHA Board of Commissioners on June 27, 2016)

Chapter 6.A.

PART III: CALCULATING RENT

6-III.A. OVERVIEW OF INCOME-BASED RENT CALCULATIONS

The first step in calculating income-based rent is to determine each family's total tenant payment (TTP). Then, if the family is occupying a unit that has tenant-paid utilities, the utility allowance is subtracted from the TTP. The result of this calculation, if a positive number, is the tenant rent. If the TTP is less than the utility allowance, the result of this calculation is a negative number, and is called the utility reimbursement, which may be paid to the family or directly to the utility company by the PHA.

TTP Formula [24 CFR 5.628]

HUD regulations specify the formula for calculating the total tenant payment (TTP) for a tenant family. TTP is the highest of the following amounts, rounded to the nearest dollar:

- 30 percent of the family's monthly adjusted income (adjusted income is defined in Part II)
- 10 percent of the family's monthly gross income (annual income, as defined in Part I, divided by 12)
- The welfare rent (in as-paid states only)
- A minimum rent between \$0 and \$50 that is established by the PHA
- The alternative non-public housing rent, as determined in accordance with 24 CFR 960.102

The PHA has authority to suspend and exempt families from minimum rent when a financial hardship exists, as defined in section 6-III.B.

Welfare Rent [24 CFR 5.628]

RRHA Policy

Welfare rent does not apply in this locality.

Minimum Rent [24 CFR 5.630]

RRHA Policy

The minimum rent for this locality is \$0.

Optional Changes to Income-Based Rents [24 CFR 960.253(c)(2) and PH Occ GB, pp. 131-134]

PHAs have been given very broad flexibility to establish their own, unique rent calculation systems as long as the rent produced is not higher than that calculated using the TTP and mandatory deductions. At the discretion of the PHA, rent policies may structure a system that uses

combinations of permissive deductions, escrow accounts, income-based rents, and the required flat and minimum rents.

The PHA's minimum rent and rent choice policies still apply to affected families. Utility allowances are applied to PHA designed income-based rents in the same manner as they are applied to the regulatory income-based rents.

The choices are limited only by the requirement that the method used not produce a TTP or tenant rent greater than the TTP or tenant rent produced under the regulatory formula.

RRHA Policy

The PHA chooses not to adopt optional changes to income-based rents.

Ceiling Rents [24 CFR 960.253 (c)(2) and (d)]

Ceiling rents are used to cap income-based rents. They are part of the income-based formula. If the calculated TTP exceeds the ceiling rent for the unit, the ceiling rent is used to calculate tenant rent (ceiling rent/TTP minus utility allowance). Increases in income do not affect the family since the rent is capped. The use of ceiling rents fosters upward mobility and income mixing.

Because of the mandatory use of flat rents, the primary function of ceiling rents now is to assist families who cannot switch back to flat rent between annual reexaminations and would otherwise be paying an income-based tenant rent that is higher than the flat rent.

Ceiling rents must be set to the level required for flat rents (which will require the addition of the utility allowance to the flat rent for properties with tenant-paid utilities) [PH Occ GB, p. 135].

RRHA Policy

The PHA chooses not to use ceiling rents.

Utility Reimbursement [24 CFR 960.253(c)(4)]

Utility reimbursement occurs when any applicable utility allowance for tenant-paid utilities exceeds the TTP. HUD permits the PHA to pay the reimbursement to the family or directly to the utility provider.

RRHA Policy

The PHA will make utility reimbursements to the family.

The PHA may make all utility reimbursement payments to qualifying families on a monthly basis or may make quarterly payments when the monthly reimbursement amount is \$15.00 or less. Reimbursements must be made once per calendar-year quarter, either prospectively or retroactively, and must be prorated if the family leaves the program in advance of its next quarterly reimbursement. The PHA must also adopt hardship policies for families for whom receiving quarterly reimbursement would create a financial hardship. The PHA must issue reimbursements that exceed \$15.00 per month on a monthly basis.

RRHA Policy

The PHA will issue all utility reimbursements monthly.

6-III.B. FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]

RRHA Policy

The financial hardship rules described below do not apply in this jurisdiction because the PHA has established a minimum rent of \$0.

Overview

If the PHA establishes a minimum rent greater than zero, the PHA must grant an exemption from the minimum rent if a family is unable to pay the minimum rent because of financial hardship.

The financial hardship exemption applies only to families required to pay the minimum rent. If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption. If the PHA determines that a hardship exists, the TTP is the highest of the remaining components of the family's calculated TTP.

HUD-Defined Financial Hardship

Financial hardship includes the following situations:

- (1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program. This includes a family member who is a noncitizen lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.

RRHA Policy

A hardship will be considered to exist only if the loss of eligibility has an impact on the family's ability to pay the minimum rent.

For a family waiting for a determination of eligibility, the hardship period will end as of the first of the month following (1) implementation of assistance, if approved, or (2) the decision to deny assistance. A family whose request for assistance is denied may request a hardship exemption based upon one of the other allowable hardship circumstances.

- (2) The family would be evicted because it is unable to pay the minimum rent.

RRHA Policy

For a family to qualify under this provision, the cause of the potential eviction must be the family's failure to pay rent or tenant-paid utilities.

- (3) Family income has decreased because of changed family circumstances, including the loss of employment.
- (4) A death has occurred in the family.

RRHA Policy

In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income).

- (5) The family has experienced other circumstances determined by the PHA.

RRHA Policy

The PHA has not established any additional hardship criteria.

Implementation of Hardship Exemption

Determination of Hardship

When a family requests a financial hardship exemption, the PHA must suspend the minimum rent requirement beginning the first of the month following the family's request.

The PHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term.

RRHA Policy

The PHA defines temporary hardship as a hardship expected to last 90 days or less. Long term hardship is defined as a hardship expected to last more than 90 days.

The PHA may not evict the family for nonpayment of minimum rent during the 90-day period beginning the month following the family's request for a hardship exemption.

When the minimum rent is suspended, the TTP reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption.

Example: Impact of Minimum Rent Exemption	
Assume the PHA has established a minimum rent of \$50.	
TTP – No Hardship	TTP – With Hardship
\$0 30% of monthly adjusted income	\$0 30% of monthly adjusted income
\$15 10% of monthly gross income	\$15 10% of monthly gross income
N/A Welfare rent	N/A Welfare rent
\$50 Minimum rent	\$50 Minimum rent
Minimum rent applies. TTP = \$50	Hardship exemption granted. TTP = \$15

RRHA Policy

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay the minimum rent.

The PHA will make the determination of hardship within 30 calendar days.

No Financial Hardship

If the PHA determines there is no financial hardship, the PHA will reinstate the minimum rent and require the family to repay the amounts suspended.

For procedures pertaining to grievance hearing requests based upon the PHA's denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

RRHA Policy

The PHA will require the family to repay the suspended amount within 30 calendar days of the PHA's notice that a hardship exemption has not been granted.

Temporary Hardship

If the PHA determines that a qualifying financial hardship is temporary, the PHA must suspend the minimum rent for the 90-day period beginning the first of the month following the date of the family's request for a hardship exemption.

At the end of the 90-day suspension period, the family must resume payment of the minimum rent and must repay the PHA the amounts suspended. HUD requires the PHA to offer a reasonable repayment agreement, on terms and conditions established by the PHA. The PHA also may determine that circumstances have changed and the hardship is now a long-term hardship.

For procedures pertaining to grievance hearing requests based upon the PHA's denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

RRHA Policy

The PHA will enter into a repayment agreement in accordance with the PHA's repayment agreement policy (see Chapter 16).

Long-Term Hardship

If the PHA determines that the financial hardship is long-term, the PHA must exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent.

RRHA Policy

The hardship period ends when any of the following circumstances apply:

- (1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent.
- (2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a \$60/month child support payment, the hardship will continue to exist until the family receives at least \$60/month in income from another source or once again begins to receive the child support.
- (3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

6-III.C. UTILITY ALLOWANCES [24 CFR 965, Subpart E]

Overview

Utility allowances are provided to families paying income-based rents when the cost of utilities is not included in the rent. When determining a family's income-based rent, the PHA must use the utility allowance applicable to the type of dwelling unit leased by the family.

For policies on establishing and updating utility allowances, see Chapter 16.

Reasonable Accommodation and Individual Relief

On request from a family, PHAs must approve a utility allowance that is higher than the applicable amount for the dwelling unit if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family with a disability [24 CFR 8 and 100, PH Occ GB, p. 172].

Likewise, residents with disabilities may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability [PH Occ GB, p. 172].

See Chapter 2 for policies related to reasonable accommodations.

Further, the PHA may grant requests for relief from charges in excess of the utility allowance on reasonable grounds, such as special needs of the elderly, ill, or residents with disabilities, or special factors not within control of the resident, as the PHA deems appropriate. The family must request the higher allowance and provide the PHA with an explanation about the additional allowance required.

PHAs should develop criteria for granting individual relief, notify residents about the availability of individual relief, and notify participants about the availability of individual relief programs (sometimes referred to as "Medical Baseline discounts") offered by the local utility company [Utility Allowance GB, p. 19; 24 CFR 965.508].

RRHA Policy

The family must request the higher allowance and provide the PHA with information about the amount of additional allowance required.

The PHA will consider the following criteria as valid reasons for granting individual relief:

The family's consumption was mistakenly portrayed as excessive due to defects in the meter or errors in the meter reading.

The excessive consumption is caused by a characteristic of the unit or owner-supplied equipment that is beyond the family's control, such as a particularly inefficient refrigerator or inadequate insulation. The allowance should be adjusted to reflect the higher consumption needs associated with the unit until the situation is remedied. The resident should be granted individual relief until the allowance is adjusted.

The excessive consumption is due to special needs of the family that are beyond their control, such as the need for specialized equipment in the case of a family member who is ill, elderly, or who has a disability.

In determining the amount of the reasonable accommodation or individual relief, the PHA will allow a reasonable measure of additional usage as necessary. To arrive at the amount of additional utility cost of specific equipment, the family may provide information from the manufacturer of the equipment, or the family or PHA may conduct an internet search for an estimate of usage or additional monthly cost.

Information on reasonable accommodation and individual relief for charges in excess of the utility allowance will be provided to all residents at move-in and with any notice of proposed allowances, schedule surcharges, and revisions. The PHA will also provide information on utility relief programs or medical discounts (sometimes referred to as “Medical Baseline discounts”) that may be available through local utility providers.

The family must request the higher allowance and provide the PHA with information about the amount of additional allowance required.

At its discretion, the PHA may reevaluate the need for the increased utility allowance as a reasonable accommodation at any regular reexamination.

If the excessive consumption is caused by a characteristic of the unit or PHA-supplied equipment that is beyond the family’s control, such as a particularly inefficient refrigerator or inadequate insulation, the individual relief to the resident will cease when the situation is remedied.

Utility Allowance Revisions [24 CFR 965.507]

The PHA must review at least annually the basis on which utility allowances have been established and, if reasonably required in order to continue adherence to standards described in 24 CFR 965.505, must establish revised allowances.

The PHA must revise the utility allowance schedule if there is a rate change that by itself or together with prior rate changes not adjusted for, results in a change of 10 percent or more from the rates on which such allowances were based.

Adjustments to resident payments as a result of such changes must be retroactive to the first day of the month following the month in which the last rate change taken into account in such revision became effective. Such rate changes are not subject to the 60-day notice [24 CFR 965.507(b)].

The tenant rent calculations must reflect any changes in the PHA’s utility allowance schedule [24 CFR 960.253(c)(3)].

RRHA Policy

Between annual reviews of utility allowances, the PHA will only revise its utility allowances due to a rate change, when required to by the regulation.

.6-III.D. PRORATED RENT FOR MIXED FAMILIES [24 CFR 5.520]

HUD regulations prohibit assistance to ineligible family members. A *mixed family* is one that includes at least one U.S. citizen or eligible immigrant and any number of ineligible family members. Except for non-public housing over income families, the PHA must prorate the assistance provided to a mixed family. The PHA will first determine TTP as if all family members were eligible and then prorate the rent based upon the number of family members that actually are eligible. To do this, the PHA must:

- (1) Subtract the TTP from the flat rent applicable to the unit. The result is the maximum subsidy for which the family could qualify if all members were eligible.

- (2) Divide the family maximum subsidy by the number of persons in the family to determine the maximum subsidy per each family member who is eligible (member maximum subsidy).
- (3) Multiply the member maximum subsidy by the number of eligible family members.
- (4) Subtract the subsidy calculated in the last step from the flat rent. This is the prorated TTP.
- (5) Subtract the utility allowance for the unit from the prorated TTP. This is the prorated rent for the mixed family.

RRHA Policy

Revised public housing flat rents will be applied to a mixed family's rent calculation at the first annual reexamination after the revision is adopted.

- (6) When the mixed family's TTP is greater than the applicable flat rent, use the TTP as the prorated TTP. The prorated TTP minus the utility allowance is the prorated rent for the mixed family.

6-III.E. FLAT RENTS AND FAMILY CHOICE IN RENTS [24 CFR 960.253]

Flat Rents [24 CFR 960.253(b)]

The flat rent is designed to encourage self-sufficiency and to avoid creating disincentives for continued residency by families who are attempting to become economically self-sufficient.

Changes in family income, expenses, or composition will not affect the flat rent amount because it is outside the income-based formula.

Policies related to the reexamination of families paying flat rent are contained in Chapter 9, and policies related to the establishment and review of flat rents are contained in Chapter 16.

Family Choice in Rents [24 CFR 960.253(a) and (e)]

With the exception of non-public housing over income families, once each year, the PHA must offer families the choice between a flat rent and an income-based rent. The family may not be offered this choice more than once a year. The PHA must document that flat rents were offered to families under the methods used to determine flat rents for the PHA.

RRHA Policy

The annual PHA offer to a family of the choice between flat and income-based rent will be conducted upon admission and upon each subsequent annual reexamination.

The PHA will require families to submit their choice of flat or income-based rent in writing and will maintain such requests in the tenant file as part of the admission or annual reexamination process.

The PHA must provide sufficient information for families to make an informed choice. This information must include the PHA's policy on switching from flat rent to income-based rent due to financial hardship and the dollar amount of the rent under each option. However, if the family chose the flat rent for the previous year the PHA is required to provide an income-based rent amount only in the year that a reexamination of income is conducted or if the family specifically requests it and submits updated income information.

Switching from Flat Rent to Income-Based Rent Due to Hardship [24 CFR 960.253(f)]

With the exception of non-public housing over-income families, a family can opt to switch from flat rent to income-based rent at any time if they are unable to pay the flat rent due to financial hardship. If the PHA determines that a financial hardship exists, the PHA must immediately allow the family to switch from flat rent to the income-based rent.

RRHA Policy

Upon determination by the PHA that a financial hardship exists, the PHA will allow a family to switch from flat rent to income-based rent effective the first of the month following the family's request.

Reasons for financial hardship include:

- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance
- The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items
- Such other situations determined by the PHA to be appropriate

RRHA Policy

The PHA considers payment of flat rent to be a financial hardship whenever the switch to income-based rent would be lower than the flat rent [PH Occ GB, p. 137].

Flat Rents and Earned Income Disallowance [A&O FAQs]

Because the EID is a function of income-based rents, a family paying flat rent cannot qualify for the EID even if a family member experiences an event that would qualify the family for the EID. If the family later chooses to pay income-based rent, they would only qualify for the EID if a new qualifying event occurred.

Under the EID original calculation method, a family currently paying flat rent that previously qualified for the EID while paying income-based rent and is currently within their exclusion period would have the exclusion period continue while paying flat rent as long as the employment that is the subject of the exclusion continues. A family paying flat rent could therefore see a family member's exclusion period expire while the family is paying flat rent.

Under the EID revised calculation method, a family currently paying flat rent that previously qualified for the EID while paying income-based rent and is currently within their exclusion period would have the exclusion period continue while paying flat rent regardless whether the employment that is the subject of the exclusion continues. A family paying flat rent could therefore see a family member's exclusion period expire while the family is paying flat rent.

Chapter 6.B.

PART IV: CALCULATING RENT

6-IV.A. OVERVIEW OF INCOME-BASED RENT CALCULATIONS

The first step in calculating income-based rent is to determine each family's total tenant payment (TTP). Then, if the family is occupying a unit that has tenant-paid utilities, the utility allowance is subtracted from the TTP. The result of this calculation, if a positive number, is the tenant rent. If the TTP is less than the utility allowance, the result of this calculation is a negative number, and is called the utility reimbursement, which may be paid to the family or directly to the utility company by the PHA.

TTP Formula [24 CFR 5.628]

HUD regulations specify the formula for calculating the total tenant payment (TTP) for an assisted family. TTP is the highest of the following amounts, rounded to the nearest dollar:

- 30 percent of the family's monthly adjusted income (adjusted income is defined in Part II)
- 10 percent of the family's monthly gross income (annual income, as defined in Part I, divided by 12)
- The welfare rent (in as-paid states only)
- A minimum rent between \$0 and \$50 that is established by the PHA

The PHA has authority to suspend and exempt families from minimum rent when a financial hardship exists, as defined in section 6-IV.B.

Welfare Rent [24 CFR 5.628]

RRHA Policy

Welfare rent does not apply in this locality.

Minimum Rent [24 CFR 5.630]

RRHA Policy

The minimum rent for this locality is \$0.

Optional Changes to Income-Based Rents [24 CFR 960.253(c)(2) and PH Occ GB, pp. 131-134]

PHAs have been given very broad flexibility to establish their own, unique rent calculation systems as long as the rent produced is not higher than that calculated using the TTP and mandatory deductions. At the discretion of the PHA, rent policies may structure a system that uses combinations of permissive deductions, escrow accounts, income-based rents, and the required flat and minimum rents.

The PHA's minimum rent and rent choice policies still apply to affected families. Utility allowances are applied to PHA designed income-based rents in the same manner as they are applied to the regulatory income-based rents.

The choices are limited only by the requirement that the method used not produce a TTP or tenant rent greater than the TTP or tenant rent produced under the regulatory formula.

RRHA Policy

The PHA chooses not to adopt optional changes to income-based rents.

Ceiling Rents [24 CFR 960.253 (c)(2) and (d)]

Ceiling rents are used to cap income-based rents. They are part of the income-based formula. If the calculated TTP exceeds the ceiling rent for the unit, the ceiling rent is used to calculate tenant rent (ceiling rent/TTP minus utility allowance). Increases in income do not affect the family since the rent is capped. The use of ceiling rents fosters upward mobility and income mixing.

Because of the mandatory use of flat rents, the primary function of ceiling rents now is to assist families who cannot switch back to flat rent between annual reexaminations and would otherwise be paying an income-based tenant rent that is higher than the flat rent.

Ceiling rents must be set to the level required for flat rents (which will require the addition of the utility allowance to the flat rent for properties with tenant-paid utilities) [PH Occ GB, p. 135].

RRHA Policy

The PHA chooses not to use ceiling rents.

Utility Reimbursement [24 CFR 982.514(b); 982.514]

Utility reimbursement occurs when any applicable utility allowance for tenant-paid utilities exceeds the TTP. HUD permits the PHA to pay the reimbursement to the family or directly to the utility provider.

RRHA Policy

The PHA will make utility reimbursements to the family.

The PHA may make all utility reimbursement payments to qualifying families on a monthly basis or may make quarterly payments when the monthly reimbursement amount is \$15.00 or less. Reimbursements must be made once per calendar-year quarter, either prospectively or retroactively, and must be prorated if the family leaves the program in advance of its next quarterly reimbursement. The PHA must also adopt hardship policies for families for whom receiving quarterly reimbursement would create a financial hardship. The PHA must issue reimbursements that exceed \$15.00 per month on a monthly basis.

RRHA Policy

The PHA will issue all utility reimbursements monthly.

6-IV.B. FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]

RRHA Policy

The financial hardship rules described below do not apply in this jurisdiction because the PHA has established a minimum rent of \$0.

Overview

If the PHA establishes a minimum rent greater than zero, the PHA must grant an exemption from the minimum rent if a family is unable to pay the minimum rent because of financial hardship.

The financial hardship exemption applies only to families required to pay the minimum rent. If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption.

If the PHA determines that a hardship exists, the family share is the highest of the remaining components of the family's calculated TTP.

HUD-Defined Financial Hardship

Financial hardship includes the following situations:

- (1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program. This includes a family member who is a noncitizen lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.

RRHA Policy

A hardship will be considered to exist only if the loss of eligibility has an impact on the family's ability to pay the minimum rent.

For a family waiting for a determination of eligibility, the hardship period will end as of the first of the month following: (1) implementation of assistance, if approved, or (2) the decision to deny assistance. A family whose request for assistance is denied may request a hardship exemption based upon one of the other allowable hardship circumstances.

- (2) The family would be evicted because it is unable to pay the minimum rent.

RRHA Policy

For a family to qualify under this provision, the cause of the potential eviction must be the family's failure to pay rent to the owner or tenant-paid utilities.

- (3) Family income has decreased because of changed family circumstances, including the loss of employment.

- (4) A death has occurred in the family.

RRHA Policy

In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income).

- (5) The family has experienced other circumstances determined by the PHA.

RRHA Policy

The PHA has not established any additional hardship criteria.

Implementation of Hardship Exemption

Determination of Hardship

When a family requests a financial hardship exemption, the PHA must suspend the minimum rent requirement beginning the first of the month following the family's request.

The PHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term.

RRHA Policy

The PHA defines temporary hardship as a hardship expected to last 90 days or less. Long-term hardship is defined as a hardship expected to last more than 90 days.

When the minimum rent is suspended, the family share reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption.

Example: Impact of Minimum Rent Exemption	
Assume the PHA has established a minimum rent of \$50.	
Family Share – No Hardship	Family Share – With Hardship
\$0 30% of monthly adjusted income	\$0 30% of monthly adjusted income
\$15 10% of monthly gross income	\$15 10% of monthly gross income
N/A Welfare rent	N/A Welfare rent
\$50 Minimum rent	\$50 Minimum rent
Minimum rent applies. TTP = \$50	Hardship exemption granted. TTP = \$15

RRHA Policy

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family’s ability to pay the minimum rent.

The PHA will make the determination of hardship within 30 calendar days.

No Financial Hardship

If the PHA determines there is no financial hardship, the PHA will reinstate the minimum rent and require the family to repay the amounts suspended.

For procedures pertaining to grievance hearing requests based upon the PHA’s denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

RRHA Policy

The PHA will require the family to repay the suspended amount within 30 calendar days of the PHA’s notice that a hardship exemption has not been granted.

Temporary Hardship

If the PHA determines that a qualifying financial hardship is temporary, the PHA must suspend the minimum rent for the 90-day period beginning the first of the month following the date of the family’s request for a hardship exemption.

At the end of the 90-day suspension period, the family must resume payment of the minimum rent and must repay the PHA the amounts suspended. HUD requires the PHA to offer a reasonable repayment agreement, on terms and conditions established by the PHA. The PHA also may determine that circumstances have changed and the hardship is now a long-term hardship.

For procedures pertaining to grievance hearing requests based upon the PHA's denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

RRHA Policy

The PHA will enter into a repayment agreement in accordance with the PHA's repayment agreement policy (see Chapter 16).

Long-Term Hardship

If the PHA determines that the financial hardship is long-term, the PHA must exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent.

RRHA Policy

The hardship period ends when any of the following circumstances apply:

- (1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent.
- (2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a \$60/month child support payment, the hardship will continue to exist until the family receives at least \$60/month in income from another source or once again begins to receive the child support.
- (3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

6-IV.C. UTILITY ALLOWANCES [24 CFR 965, Subpart E]

Overview

Utility allowances are provided to families paying income-based rents when the cost of utilities is not included in the rent. When determining a family's income-based rent, the PHA must use the utility allowance applicable to the type of dwelling unit leased by the family.

For policies on establishing and updating utility allowances, see Chapter 16.

Reasonable Accommodation and Individual Relief

On request from a family, PHAs must approve a utility allowance that is higher than the applicable amount for the dwelling unit if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family with a disability [24 CFR 8 and 100, PH Occ GB, p. 172].

Likewise, residents with disabilities may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability [PH Occ GB, p. 172].

See Chapter 2 for policies related to reasonable accommodations.

Further, the PHA may grant requests for relief from charges in excess of the utility allowance on reasonable grounds, such as special needs of the elderly, ill, or residents with disabilities, or special factors not within control of the resident, as the PHA deems appropriate. The family must request the higher allowance and provide the PHA with an explanation about the additional allowance required.

PHAs should develop criteria for granting individual relief, notify residents about the availability of individual relief, and notify participants about the availability of individual relief programs (sometimes referred to as “Medical Baseline discounts”) offered by the local utility company [Utility Allowance GB, p. 19; 24 CFR 965.508].

RRHA Policy

The family must request the higher allowance and provide the PHA with information about the amount of additional allowance required.

The PHA will consider the following criteria as valid reasons for granting individual relief:

The family’s consumption was mistakenly portrayed as excessive due to defects in the meter or errors in the meter reading.

The excessive consumption is caused by a characteristic of the unit or owner-supplied equipment that is beyond the family’s control, such as a particularly inefficient refrigerator or inadequate insulation. The allowance should be adjusted to reflect the higher consumption needs associated with the unit until the situation is remedied. The resident should be granted individual relief until the allowance is adjusted.

The excessive consumption is due to special needs of the family that are beyond their control, such as the need for specialized equipment in the case of a family member who is ill, elderly, or who has a disability.

In determining the amount of the reasonable accommodation or individual relief, the PHA will allow a reasonable measure of additional usage as necessary. To arrive at the amount of additional utility cost of specific equipment, the family may provide information from the manufacturer of the equipment, or the family or PHA may conduct an internet search for an estimate of usage or additional monthly cost.

Information on reasonable accommodation and individual relief for charges in excess of the utility allowance will be provided to all residents at move-in and with any notice of proposed allowances, schedule surcharges, and revisions. The PHA will also provide information on utility relief programs or medical discounts (sometimes referred to as “Medical Baseline discounts”) that may be available through local utility providers.

The family must request the higher allowance and provide the PHA with information about the amount of additional allowance required.

At its discretion, the PHA may reevaluate the need for the increased utility allowance as a reasonable accommodation at any regular reexamination.

If the excessive consumption is caused by a characteristic of the unit or PHA-supplied equipment that is beyond the family’s control, such as a particularly inefficient refrigerator or inadequate insulation, the individual relief to the resident will cease when the situation is remedied.

Utility Allowance Revisions [24 CFR 965.507]

The PHA must review at least annually the basis on which utility allowances have been established and, if reasonably required in order to continue adherence to standards described in 24 CFR 965.505, must establish revised allowances.

The PHA must revise the utility allowance schedule if there is a rate change that by itself or together with prior rate changes not adjusted for, results in a change of 10 percent or more from the rates on which such allowances were based.

Adjustments to resident payments as a result of such changes must be retroactive to the first day of the month following the month in which the last rate change taken into account in such revision became effective. Such rate changes are not subject to the 60-day notice [24 CFR 965.507(b)].

The tenant rent calculations must reflect any changes in the PHA's utility allowance schedule [24 CFR 960.253(c)(3)].

RRHA Policy

Between annual reviews of utility allowances, the PHA will only revise its utility allowances due to a rate change, when required to by the regulation.

6-IV.D. PRORATED RENT FOR MIXED FAMILIES [24 CFR 5.520]

HUD regulations prohibit assistance to ineligible family members. A *mixed family* is one that includes at least one U.S. citizen or eligible immigrant and any number of ineligible family members. Except for non-public housing over income families, the PHA must prorate the assistance provided to a mixed family. The PHA will first determine TTP as if all family members were eligible and then prorate the rent based upon the number of family members that actually are eligible. To do this, the PHA must:

- (1) Subtract the TTP from the flat rent applicable to the unit. The result is the maximum subsidy for which the family could qualify if all members were eligible.
- (2) Divide the family maximum subsidy by the number of persons in the family to determine the maximum subsidy per each family member who is eligible (member maximum subsidy).
- (3) Multiply the member maximum subsidy by the number of eligible family members.
- (4) Subtract the subsidy calculated in the last step from the flat rent. This is the prorated TTP.
- (5) Subtract the utility allowance for the unit from the prorated TTP. This is the prorated rent for the mixed family.

RRHA Policy

Revised public housing flat rents will be applied to a mixed family's rent calculation at the first annual reexamination after the revision is adopted.

- (6) When the mixed family's TTP is greater than the applicable flat rent, use the TTP as the prorated TTP. The prorated TTP minus the utility allowance is the prorated rent for the mixed family.

6-IV.E. FLAT RENTS AND FAMILY CHOICE IN RENTS [24 CFR 960.253]

Flat Rents [24 CFR 960.253(b)]

The flat rent is designed to encourage self-sufficiency and to avoid creating disincentives for continued residency by families who are attempting to become economically self-sufficient.

Changes in family income, expenses, or composition will not affect the flat rent amount because it is outside the income-based formula.

Policies related to the reexamination of families paying flat rent are contained in Chapter 9, and policies related to the establishment and review of flat rents are contained in Chapter 16.

Family Choice in Rents [24 CFR 960.253(a) and (e)]

With the exception of non-public housing over income families, once each year, the PHA must offer families the choice between a flat rent and an income-based rent. The family may not be offered this choice more than once a year. The PHA must document that flat rents were offered to families under the methods used to determine flat rents for the PHA.

RRHA Policy

The annual PHA offer to a family of the choice between flat and income-based rent will be conducted upon admission and upon each subsequent annual reexamination.

The PHA will require families to submit their choice of flat or income-based rent in writing and will maintain such requests in the tenant file as part of the admission or annual reexamination process.

The PHA must provide sufficient information for families to make an informed choice. This information must include the PHA's policy on switching from flat rent to income-based rent due to financial hardship and the dollar amount of the rent under each option. However, if the family chose the flat rent for the previous year the PHA is required to provide an income-based rent amount only in the year that a reexamination of income is conducted or if the family specifically requests it and submits updated income information.

Switching from Flat Rent to Income-Based Rent Due to Hardship [24 CFR 960.253(f)]

With the exception of non-public housing over-income families, a family can opt to switch from flat rent to income-based rent at any time if they are unable to pay the flat rent due to financial hardship. If the PHA determines that a financial hardship exists, the PHA must immediately allow the family to switch from flat rent to the income-based rent.

RRHA Policy

Upon determination by the PHA that a financial hardship exists, the PHA will allow a family to switch from flat rent to income-based rent effective the first of the month following the family's request.

Reasons for financial hardship include:

- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance
- The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items

- Such other situations determined by the PHA to be appropriate

RRHA Policy

The PHA considers payment of flat rent to be a financial hardship whenever the switch to income-based rent would be lower than the flat rent [PH Occ GB, p. 137].

Attachment I: PHA Plan Element – Homeownership Programs

RRHA operates a Section 5(h) Lease-Purchase Homeownership Program that provides opportunities for residents of the Public Housing program to purchase their public housing units. This program was approved by HUD and implemented in 2001 and originally included 32 units. The count was reduced to 22 units, with HUD approval, in 2011. Currently, 6 units remain in the program.

RRHA is currently operating a HUD-approved Section 32 Homeownership Program. This program provides housing units for homeownership opportunities for HUD-assisted renters and other families in the Roanoke community whose income creates a barrier to homeownership. The program originally included 5 units but currently has only 2 units unsold.

In an effort to provide qualified buyers with more options, particularly in low-poverty census tracts, RRHA used some 5(h) funds to find homes for qualified buyers that are not interested in purchasing a Section 32 home or participating in the Lease-Purchase program. Two homebuyers recently purchased homes in the City of Roanoke that RRHA acquired and renovated.

RRHA also operates a Housing Choice Voucher Homeownership Program. Currently, 11 HCV program participants are receiving mortgage-assistance through this program.

RRHA also plans to use proceeds from homes previously sold in homeownership programs to develop additional affordable homeownership opportunities within the City of Roanoke.

Attachment J: PHA Plan Element – Substantial Deviation and Significant Amendment/Modification

RRHA defines the following criteria for substantial deviations and significant amendments/modifications:

1. Discretionary changes in the plans or policies of the housing authority that fundamentally change the mission, goals, objectives, or plans of the agency and which require formal approval of the Board of Commissioners.
2. Revisions to the following policies: rent, screening and admission, or organization of the waiting list.

An exception to this definition will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements; HUD does not consider such changes to be significant amendments.