

## 1A. Continuum of Care (CoC) Identification

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

**1A-1. CoC Name and Number:** NC-504 - Greensboro, High Point/Guilford County CoC

**1A-2. Collaborative Applicant Name:** Guilford County DHHS

**1A-3. CoC Designation:** CA

**1A-4. HMIS Lead:** Partners Ending Homelessness

## 1B. Coordination and Engagement–Inclusive Structure and Participation

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

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<b>1B-1.</b>	<b>Inclusive Structure and Participation–Participation in Coordinated Entry.</b>	
	NOFO Sections V.B.1.a.(1), V.B.1.e., V.B.1f., and V.B.1.p.	
	In the chart below for the period from May 1, 2023 to April 30, 2024:	
1.	select yes or no in the chart below if the entity listed participates in CoC meetings, voted—including selecting CoC Board members, and participated in your CoC’s coordinated entry system; or	
2.	select Nonexistent if the organization does not exist in your CoC’s geographic area:	

	Organization/Person	Participated in CoC Meetings	Voted, Including Electing CoC Board Members	Participated in CoC’s Coordinated Entry System
1.	Affordable Housing Developer(s)	Yes	Yes	Yes
2.	CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes	Yes
3.	Disability Advocates	Yes	Yes	Yes
4.	Disability Service Organizations	Yes	Yes	Yes
5.	EMS/Crisis Response Team(s)	Yes	Yes	No
6.	Homeless or Formerly Homeless Persons	Yes	Yes	Yes
7.	Hospital(s)	No	No	No
8.	Indian Tribes and Tribally Designated Housing Entities (TDHEs) (Tribal Organizations)	Nonexistent	No	No
9.	Law Enforcement	Yes	Yes	Yes
10.	Lesbian, Gay, Bisexual, Transgender (LGBTQ+) Advocates	Yes	Yes	Yes
11.	LGBTQ+ Service Organizations	Yes	Yes	Yes
12.	Local Government Staff/Officials	Yes	Yes	Yes
13.	Local Jail(s)	Yes	Yes	Yes
14.	Mental Health Service Organizations	Yes	Yes	Yes
15.	Mental Illness Advocates	Yes	Yes	Yes
16.	Organizations led by and serving Black, Brown, Indigenous and other People of Color	Yes	Yes	Yes

17.	Organizations led by and serving LGBTQ+ persons	Yes	Yes	Yes
18.	Organizations led by and serving people with disabilities	Yes	Yes	Yes
19.	Other homeless subpopulation advocates	Yes	Yes	Yes
20.	Public Housing Authorities	Yes	Yes	Yes
21.	School Administrators/Homeless Liaisons	Yes	Yes	Yes
22.	Street Outreach Team(s)	Yes	Yes	Yes
23.	Substance Abuse Advocates	Yes	Yes	Yes
24.	Substance Abuse Service Organizations	Yes	Yes	Yes
25.	Agencies Serving Survivors of Human Trafficking	Yes	Yes	Yes
26.	Victim Service Providers	Yes	Yes	Yes
27.	Domestic Violence Advocates	Yes	Yes	Yes
28.	Other Victim Service Organizations	No	No	No
29.	State Domestic Violence Coalition	No	No	No
30.	State Sexual Assault Coalition	No	No	No
31.	Youth Advocates	Yes	Yes	Yes
32.	Youth Homeless Organizations	Yes	Yes	Yes
33.	Youth Service Providers	Yes	Yes	Yes
	Other: (limit 50 characters)			
34.	Family Justice Center and Jail Re-Entry	Yes	Yes	Yes
35.	Veteran Administration Medical Center (VAMC), Veteran SSVF Providers	Yes	Yes	Yes

1B-1a.	Experience Promoting Racial Equity.	
	NOFO Section III.B.3.c.	

Describe in the field below your CoC's experience in effectively addressing the needs of underserved communities, particularly Black and Brown communities, who are substantially overrepresented in the homeless population.

(limit 2,500 characters)

NC-504 intentionally engaged agencies and individuals that serve Black, Brown, Indigenous and other People of Color (BIPOC) including People with Lived Experience (PWLE) to be a part of the CoC Membership/Board and Coordinated Entry System to ensure programs are operating and designed in an equitable matter. During monitoring of CoC funded agencies and with new CoC member agencies, the CoC Lead discussed the importance of agency staff/Board members reflecting the population being served and that PWLE should be included in program design to ensure it meets the needs of those persons being served. The CoC has provided multiple opportunities for individuals/agencies to participate in racial and equity training to ensure funded agencies adhere to the Written Standards and policies/procedure established by the CoC that guide equitable practices. The CoC in collaboration with Corporation for Supportive Housing (CSH) and the CoC Strategic Planning Committee solicited community feedback and input through outreach, community events, advisory boards, and engaged approx. fifty community partners on issues surrounding culture, communication, and racial/equity to address needs/gaps and disparities in the system. In Fall 2023, the CoC established a Justice, Equity, Diversity, Inclusion/Persons with Lived Experience Committee, which is led by women of color and acts as a guiding resource of inclusion for service providers/agencies and the unhoused population in NC-504. The committee is currently working to assess the homelessness system through an equity lens and evaluating how systemic injustice, racial/inequity can impact practices of staff and agencies. The committee plans to attain, review, and regularly evaluate data so information is evaluated and integrated in the CoC policies and procedures and informs training throughout the CoC, ensuring equity, inclusion, and belonging strategies are included in the design and operation of all entities providing services and housing in the CoC. NC-504 will continue to work closely with local government agencies/departments to exchange effective input on how best to serve and provide a cross-functional method of gathering and utilizing BIPOC/PWLE's input on system program design and improvement. In collaboration with the county-wide consultants, CSH and the CoC there were two PWLE consultants hired to support and inform system-wide decision-making, program design, implementation, and policies and procedures for NC-504.

1B-2.	Open Invitation for New Members.	
	NOFO Section V.B.1.a.(2)	
	Describe in the field below how your CoC:	
1.	communicated a transparent invitation process annually (e.g., communicated to the public on the CoC's website) to solicit new members to join the CoC;	
2.	ensured effective communication and access for persons with disabilities, including the availability of accessible electronic formats; and	
3.	invited organizations serving culturally specific communities experiencing homelessness in your CoC's geographic area to address equity (e.g., Black, Latino, Indigenous, LGBTQ+, and persons with disabilities).	

(limit 2,500 characters)

1) NC-504 actively solicits new members by using social media, attending public meetings/community events, publicly posting the CoC newsletter, announcements, meeting invitations, and direct engagement with leaders, stakeholders, advocates, and persons with lived expertise. The CoC maintains an open invitation process throughout the year to become a member agency/organization. The CoC utilizes creative ways to engage interested people/agencies learn/join, for example the use of a QR code to access CoC information. Member agencies are encouraged to invite other agencies they partner with to join the CoC and to participate in committees and workgroups. In the last twelve months, sixteen new agencies/organizations have joined the CoC.

2) NC-504 ensures effective communication and access for persons with disabilities and person with Limited English Proficiency (LEP) for NC-504 Membership, meetings/committee, special events, which are posted on the NC-504 website which follows Web Content Accessibility Guidelines (WCAG). These guidelines allow the content posted to the website to be accessible to people with disabilities, including blindness and low vision, deafness and hearing loss, learning disabilities, cognitive limitations, limited movement, speech disabilities, photosensitivity and combinations of these. Weekly scans are completed on the website and flag accessibility-related issues. Photographs have detailed captions and fonts are appropriately selected for readability. To promote accessibility for both financial and physical reasons and remove barriers in meeting attendance, most NC-504 and committee meetings are held virtually.

3) NC-504 engages with minority subpopulations/protected groups experiencing homelessness to ensure equitable access to membership opportunities. The CoC partnered with Guilford Greene Foundation and LGBTQ Center, Youth Focus LGBTQIA Homeless Shelter, Montagnard-Dega Association, Faith Action International, Seji S.O.A.R.S, and the Disability Advocacy Center. Some of these organizations also are voting members in the CoC, informing decisions that impact the homeless and greater community. In FY2023-24, there have been ten new members organizations that are led by African or African American people. NC-504's membership committee's strategy is to continue to improve outreach and engagement efforts to obtain more members that serve special populations of people experiencing homelessness.

1B-3.	CoC's Strategy to Solicit/Consider Opinions on Preventing and Ending Homelessness. NOFO Section V.B.1.a.(3)	
Describe in the field below how your CoC:		
1.	solicited and considered opinions from a broad array of organizations and individuals that have knowledge of homelessness, or an interest in preventing and ending homelessness;	
2.	communicated information during public meetings or other forums your CoC uses to solicit public information;	
3.	ensured effective communication and access for persons with disabilities, including the availability of accessible electronic formats; and	
4.	took into consideration information gathered in public meetings or forums to address improvements or new approaches to preventing and ending homelessness.	

**(limit 2,500 characters)**

1) NC-504 solicits and considers opinions from a broad array of organizations/individuals that have knowledge or interest in preventing and ending homelessness. The CoC released a Coordinated Entry (CE) survey that providers/participants completed so the CoC could gain information on CE’s functionality, equity, and service delivery. Opinions on the homeless system/housing concerns, including on racial disparities in the system, were solicited through a partnership with Corporation for Supportive Housing who interviewed over 50 agencies and individuals to develop a resource map of the CoC area and utilized a SWOT analysis to construct a strategic plan. The Guilford County Homelessness Taskforce and the Inter-Local Committee, comprised of Guilford County/City of Greensboro/High Point, CoC stakeholders, and elected officials, continue to meet to discuss homelessness/housing strategies and provide ongoing input to the CoC.

2) NC-504 staff attended the Greensboro 2024 Housing Summit and the Carolina Core Housing Summit, along with other CoC agencies/providers to discuss the housing needs for vulnerable subpopulations in the CoC (youth, persons fleeing DV, etc.). The CoC continues to communicate information to the public through open meetings to ask and answer questions, learn about funding opportunities, review data/reports, collaborative efforts/resources, and discuss growth opportunities within CoC.

3) Surveys published by the CoC to solicit opinions follow Web Content Accessibility Guidelines (WCAG) which allow the content posted to the website to be accessible to people with disabilities, including blindness and low vision, deafness, etc., as photographs have detailed captions/fonts are appropriately selected for readability. The CoC and providers also have free access to a language interpreter line for persons with Limited English Proficiency to support access to and solicitation of persons from diverse cultures/backgrounds. CoC meetings have a virtual option, recordings/minutes posted, and contact information for the CoC Lead prominently posted.

4) NC-504 utilized public and provider opinions received in public meeting/forums/interviews to inform strategies, set local funding priorities, design system improvements, improve CE, and communicate the need for more housing opportunities. This engagement strategy supported the submission of a CoC Builds NOFO application in 2024 as a community approach to preventing and ending homelessness.

1B-4.	Public Notification for Proposals from Organizations Not Previously Awarded CoC Program Funding.	
	NOFO Section V.B.1.a.(4)	
	Describe in the field below how your CoC notified the public:	
1.	that your CoC will consider project applications from organizations that have not previously received CoC Program funding;	
2.	about how project applicants must submit their project applications—the process;	
3.	about how your CoC would determine which project applications it would submit to HUD for funding; and	

4. ensured effective communication and access for persons with disabilities, including the availability of accessible electronic formats.
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(limit 2,500 characters)

1) To solicit new applicants for the FY2024 CoC Program competition, NC-504 conducted a training to engage new applicants, released a request for Letters of Interest and held technical assistance hours in an effort to solicit organizations that had not previously received CoC Program funding prior to the local competition. The CoC provided a CoC Grant 101 on 4/25/24, which was open to any agency, recorded and posted on CoC website in an effort to encourage and engage new applicants. Agencies applying for funding for the first time/new activity were also able to submit a Letter of Interest (LOI) due 8/5/2024. This process provided CoC staff the opportunity to work with agencies to ensure an understanding of eligible activities, competition process and provide technical assistance. The CoC also hosted two open office hours sessions to discuss the competition process and answer questions from the community which resulted in two new agencies submitting new project applications.

2) All parts of the local competition process were posted to the CoC website on 8/16/2024: timeline, Ranking & Review policy, Reallocation and Appeals Policies and Procedures, new/renewal scorecards, links to the HUD competition page, NC-504 supplemental questions and required attachments list. NC-504 released a second notice on 8/27/24 when the Annual Renewal Demand and bonus funding amounts was posted by HUD. All project applications and supplemental materials were due by 09/05/24 via email to the Collaborative Applicant.

3) NC-504's System Performance & Evaluation Committee (SPE Committee) determined which project applications to recommend for funding utilizing a CoC approved scorecard for new/renewal projects and HUD/local priorities to review and rank all project applications in accordance with the NC-504 Ranking and Review Policy. SPE Committee recommendations were made to the CoC Governing Board and membership for approval. For transparency in scoring, the project scorecard was made available in the notice and posted to the CoC website.

4) All information on the CoC local competition was accessible on the CoC website, Facebook and newsletter. The CoC's website follows Web Content Accessibility Guidelines (WCAG), which is accessible to a wider range of people with disabilities including blindness and low vision. Photographs have detailed captions and fonts are appropriately selected for readability. Weekly scans are completed on the website to flag accessibility-related issues.

# 1C. Coordination and Engagement

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

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<b>1C-1.</b>	<b>Coordination with Federal, State, Local, Private, and Other Organizations.</b>	
	NOFO Section V.B.1.b.	
	In the chart below:	
	1. select yes or no for entities listed that are included in your CoC's coordination, planning, and operations of projects that serve individuals, families, unaccompanied youth, persons who are fleeing domestic violence who are experiencing homelessness, or those at risk of homelessness; or	
	2. select Nonexistent if the organization does not exist within your CoC's geographic area.	

	Entities or Organizations Your CoC Coordinates with for Planning or Operations of Projects	Coordinates with the Planning or Operations of Projects?
1.	Funding Collaboratives	Yes
2.	Head Start Program	Yes
3.	Housing and services programs funded through Local Government	Yes
4.	Housing and services programs funded through other Federal Resources (non-CoC)	Yes
5.	Housing and services programs funded through private entities, including Foundations	Yes
6.	Housing and services programs funded through State Government	Yes
7.	Housing and services programs funded through U.S. Department of Health and Human Services (HHS)	Yes
8.	Housing and services programs funded through U.S. Department of Justice (DOJ)	Yes
9.	Housing Opportunities for Persons with AIDS (HOPWA)	Yes
10.	Indian Tribes and Tribally Designated Housing Entities (TDHEs) (Tribal Organizations)	Nonexistent
11.	Organizations led by and serving Black, Brown, Indigenous and other People of Color	Yes
12.	Organizations led by and serving LGBTQ+ persons	Yes
13.	Organizations led by and serving people with disabilities	Yes
14.	Private Foundations	Yes
15.	Public Housing Authorities	Yes
16.	Runaway and Homeless Youth (RHY)	Yes
17.	Temporary Assistance for Needy Families (TANF)	Yes
	Other:(limit 50 characters)	
18.	State-Level Early Childhood Coordination - Yay Babies	Yes



<b>1C-2.</b>	<b>CoC Consultation with ESG Program Recipients.</b>	
	NOFO Section V.B.1.b.	

In the chart below select yes or no to indicate whether your CoC:

1.	Consulted with ESG Program recipients in planning and allocating ESG Program funds?	Yes
2.	Provided Point-in-Time (PIT) count and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions within its geographic area?	Yes
3.	Ensured local homelessness information is communicated and addressed in the Consolidated Plan updates?	Yes
4.	Coordinated with ESG recipients in evaluating and reporting performance of ESG Program recipients and subrecipients?	Yes

<b>1C-3.</b>	<b>Ensuring Families are not Separated.</b>	
	NOFO Section V.B.1.c.	

Select yes or no in the chart below to indicate how your CoC ensures emergency shelter, transitional housing, and permanent housing (PSH and RRH) do not deny admission or separate family members regardless of each family member's self-reported sexual orientation and gender identity:

1.	Conducted mandatory training for all CoC- and ESG-funded service providers to ensure families are not separated?	No
2.	Conducted optional training for all CoC- and ESG-funded service providers to ensure family members are not separated?	Yes
3.	Worked with CoC and ESG recipient(s) to adopt uniform anti-discrimination policies for all subrecipients?	Yes
4.	Worked with ESG recipient(s) to identify both CoC- and ESG-funded facilities within your CoC's geographic area that might be out of compliance and took steps to work directly with those facilities to bring them into compliance?	Yes
5.	Sought assistance from HUD by submitting questions or requesting technical assistance to resolve noncompliance by service providers?	Yes

<b>1C-4.</b>	<b>CoC Collaboration Related to Children and Youth—SEAs, LEAs, School Districts.</b>	
	NOFO Section V.B.1.d.	

Select yes or no in the chart below to indicate the entities your CoC collaborates with:

1.	Youth Education Provider	Yes
2.	State Education Agency (SEA)	Yes
3.	Local Education Agency (LEA)	Yes
4.	School Districts	Yes

<b>1C-4a.</b>	<b>Formal Partnerships with Youth Education Providers, SEAs, LEAs, School Districts.</b>	
	NOFO Section V.B.1.d.	

Describe in the field below the formal partnerships your CoC has with at least one of the entities where you responded yes in question 1C-4.

**(limit 2,500 characters)**

NC-504 has a reserved seat for Guilford County Schools (GCS) on the CoC's Governing Board in accordance with the Governance Charter. GCS has two representatives appointed to the Guilford County Homelessness Task Force, which is a group of elected officials from across Guilford County, county/city senior staff, the CoC, and community representatives working to strategically address the impacts of homelessness on people throughout Guilford County. The CoC also collaborates with the LEA and other designated youth education providers by participating in coordinated response to crisis, offering consultation and support for children (meeting McKinney-Vento criteria), children aging out of Foster Care, and early childhood programs. The CoC also collaborates with the Public Health Department to ensure access to services and programs for families and children experiencing homelessness (i.e., School Nurses, Family Connect and Early Childhood Intervention Programs, immunization clinic, WIC, etc.). The CoC Lead is a member of Yay Babies, a state-wide advocacy/education group sponsored by NC DHHS Division of Child Development and Early Education, that has representation from state and local early childhood providers, university-based researchers; homeless services/housing/shelter providers, Head Start/Smart Start, NC homeless education administrators and liaisons, child/family advocates (local and national) that address the risks of early childhood homelessness and ensure equity in access, services delivery, data collection/integration, and resources. In October of 2023, Yay Babies published the Action Plan for an Early Childhood Homelessness Support System for NC to address the risks associated with childhood homelessness, build capacity and support for early childhood educators, staff, and organizations, create integrated, accessible, equitable, and child-centered community-based systems focused on the needs of young children and caregivers experiencing homelessness. Finally, NC-504's Written Standards and Coordinated Entry policies address school-aged children and early childhood education needs and outline the required responses for agencies to ensure continuity of educational services for all children.

1C-4b.	Informing Individuals and Families Who Have Recently Begun Experiencing Homelessness about Eligibility for Educational Services.	
	NOFO Section V.B.1.d.	

Describe in the field below written policies and procedures your CoC uses to inform individuals and families who have recently begun experiencing homelessness of their eligibility for educational services.

**(limit 2,500 characters)**

NC-504’s Written Standards mandate the process for all agencies that receive federal and/or state-based funding to adhere to the McKinney-Vento Homeless Education Act and the Every Student Succeeds Act (ESSA) enables to remain at their school of origin, if feasible, or they should be immediately enrolled at the next appropriate school, regardless of the availability of school records, health records, birth certificates, or proof of residency. To inform families and unaccompanied youth of their educational rights and services, Guilford County School (GCS) provides posters and awareness literature available in seven languages and posted at each school, central office sites, local churches, emergency shelter, health and human services locations, and community agencies. Once a child(ren) has been identified as meeting criteria for the McKinney-Vento Act, GCS Homeless Liaison and/or assigned School Social Worker is informed and then contact made with the family/unaccompanied youth to inform them of their rights and needs including; transportation, if any, ensuring that parents are aware of school policies regarding excused absences and medical documentation necessary to return to school after an illness or injury, and options for enrollment in childcare and early childhood programs. The GCS Homelessness Liaison should be contacted within forty-eight hours of homeless program admission to arrange services. CoC agencies are required to have a liaison designated to inform families/unaccompanied youth of their educational rights and make appropriate referrals during intake, as well as other needs identified by the Children’s Development Services Agency (CDSA). Additionally, the CoC Coordinated Entry (CE) System Lead Agency MOU outlines the work that NC-504 performs collaboratively with GCS area LEA, to ensure all children and youth experiencing homelessness are identified as eligible under the McKinney-Vento Act, including regular coordination with the McKinney-Vento Liaisons. GCS Liaisons also participate in CoC Membership meetings, Youth CoC Committee, the CE Process, community-wide crisis coordination, and emergency sheltering of families with children. GCS Liaisons/Superintendent are also involved in the Homeless Taskforce and share updates/amendments to GCS’s homeless education eligibility process and procedures; advocate services based on need and facilitate public notification of educational rights in schools.

1C-4c.	Written/Formal Agreements or Partnerships with Early Childhood Services Providers.	
	NOFO Section V.B.1.d.	

Select yes or no in the chart below to indicate whether your CoC has written formal agreements or partnerships with the listed providers of early childhood services:

	MOU/MOA	Other Formal Agreement
1. Birth to 3 years	No	Yes
2. Child Care and Development Fund	No	Yes
3. Early Childhood Providers	No	Yes
4. Early Head Start	No	Yes
5. Federal Home Visiting Program–(including Maternal, Infant and Early Childhood Home and Visiting or MIECHV)	No	Yes
6. Head Start	No	Yes
7. Healthy Start	No	Yes

8.	Public Pre-K	No	Yes
9.	Tribal Home Visiting Program	No	No
	Other (limit 150 characters)		
10.	Family Success Center	No	Yes

1C-5.	Addressing Needs of Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking–Collaboration with Federally Funded Programs and Victim Service Providers.
	NOFO Section V.B.1.e.

In the chart below select yes or no for the organizations your CoC collaborates with:

	Organizations	
1.	State Domestic Violence Coalitions	Yes
2.	State Sexual Assault Coalitions	No
3.	Anti-trafficking Service Providers	Yes
	Other Organizations that Help this Population (limit 500 characters)	
4.		

1C-5a.	Collaborating with Federally Funded Programs and Victim Service Providers to Address Needs of Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.
	NOFO Section V.B.1.e.

Describe in the field below how your CoC regularly collaborates with organizations that you selected yes to in Question 1C-5 to:

1.	update CoC-wide policies; and
2.	ensure all housing and services provided in the CoC's geographic area are trauma-informed and can meet the needs of survivors.

(limit 2,500 characters)

1) NC-504 regularly collaborates with CoC/ESG funded programs, state and local victim service providers/coalitions to update NC-504 policies and procedures, conduct training, and collect data, to support the needs and protect the interests of survivors. NC-504 member agencies participated in trainings on the changes to the Violence Against Women Act (VAWA) and are current with best practices/new requirements under VAWA 2022. From March 2024 - August 2024, CoC staff and provider agencies attended HUD’s 2024 VAWA and Survivor Housing Community Conversations to successfully implement VAWA 2022 requirements and create survivor-centered housing, at the system, project, and program participant level for CoC and ESG recipients. NC-504 Written Standards adopted the expanded definition of domestic violence delineated in VAWA 2022, updated policies and procedures in accordance with VAWA’s expanded definition of domestic violence for ESG and CoC recipients and NC-504’s Emergency Transfer Plan.

2) NC-504's 2024 Written Standards adopted a Trauma-Informed approach to all case management for CoC and ESG recipients and NC-504 Coordinated Entry (CE) Policies and Procedures outline the requirements for providers to ensure all housing and services are provided in trauma-informed manner. CE requires that individualized safety planning occurs with each client, all agencies make needed referrals, as appropriate, for any survivor who presents for services throughout the geographical area. CoC and ESG providers are well-versed in trauma-informed care, and are mindful that safety, security, and client choice are critical considerations in order to minimize the potential of additional trauma occurring. The CoC, working with Family Services of the Piedmont (FSP), implemented a comprehensive support system of care that connects survivors with counseling, housing, legal assistance, and community resources, ensuring survivors receive the holistic care necessary for healing and empowerment. FSP offered CoC wide trainings on trauma-informed care and community awareness of Human Trafficking, to help providers to identify the signs/effects of trauma at intake and assessments. The CoC works to ensure homeless services and housing opportunities are guided by a trauma informed framework. This framework allows survivors to access multiple services and opportunities of care that are trauma informed, thus minimizing the need to retell their story while navigating a complex system.

1C-5b.	Implemented Safety Planning, Confidentiality Protocols in Your CoC’s Coordinated Entry to Address the Needs of Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.	
	NOFO Section V.B.1.e.	
	Describe in the field below how your CoC’s coordinated entry addresses the needs of DV survivors by including:	
1.	safety planning protocols; and	
2.	confidentiality protocols.	

(limit 2,500 characters)

1) NC-504's Coordinated Entry (CE) policies and procedures require that individualized safety planning occurs with each person/family experiencing domestic violence, dating violence, sexual assault, stalking, or other life-threatening condition related to violence against the person or family member. All agencies/access sites offer appropriate referrals, for any survivor who presents for services throughout the CoC that chooses victim services additional services to ensure their safety (legal, e.g.). If the individual/family does not wish to seek victim specific services, they may access to the CE system in accordance with protocols described in the CE policies and procedures to ensure safety. Housing assessments and intakes are conducted at secure locations by staff who are trained in safety planning, well-versed in trauma-informed care, and are mindful that safety, security, contingency planning and client choice are critical considerations and a necessary part of assisting participants to move toward stability in housing. The CoC provides specialized training to ensure services in the system are trauma-informed, predicated on an empowerment model of service delivery, and delivered in a manner that is specific to serving survivors and ensuring safety.

2) NC-504's Coordinated Entry (CE) policies and procedures address confidentiality of persons fleeing victimization through separate case conferencing, trauma informed assessors at victim service providers/CE access sites and encrypting/redacting Personal Identifying Information (PII) when matching with available housing options. If the survivor does not wish to seek victim specific services, they may access NC-504's CE system in accordance with all confidentiality protocols described in the CE policies and procedures. NC-504 holds separate Case Conferencing meetings for victim service providers and only the CE score and the number of individuals and families on the DV By-Name-List is shared with non-VSP providers. The CoC ensures all CE access sites, communication, and records are confidential and intakes are conducted in a private/secure location at all times. Staff are only authorized to discuss a survivor's specific circumstances when the participant signs a specific, time limited ROI. All services are confidential, trauma informed and predicated on an empowerment model of service delivery to mitigate any coercion and ensure confidentiality is strictly maintained.

1C-5c.	Coordinated Annual Training on Best Practices to Address the Needs of Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
	NOFO Section V.B.1.e.	

In the chart below, indicate how your CoC facilitates training for project staff and coordinated entry staff that addresses best practices on safety planning and confidentiality protocols:

		Project Staff	Coordinated Entry Staff
1.	Training Occurs at least annually?	Yes	Yes
2.	Incorporates Trauma Informed best practices?	Yes	Yes
3.	Incorporates Survivor-Centered best practices?	Yes	Yes
4.	Identifies and assesses survivors' individual safety needs?	Yes	Yes
5.	Enhances and supports collaboration with DV organizations?	Yes	Yes

6.	Ensures survivors' rights, voices, and perspectives are incorporated?	Yes	Yes
	Other? (limit 500 characters)		
7.	HUD Technical Assistance Provider - Cloudburst / Coordinated Entry - integration for Victim Services Providers	Yes	Yes

**&nbsp;**

1C-5d.	Implemented VAWA-Required Written Emergency Transfer Plan Policies and Procedures for Domestic Violence, Dating Violence, Sexual Assault, and Stalking.	
	NOFO Section V.B.1.e.	

Describe in the field below:

1.	whether your CoC's written policies and procedures include an emergency transfer plan;
2.	how your CoC informs all households seeking or receiving CoC Program assistance about their rights to an emergency transfer;
3.	what your CoC requires households to do to request emergency transfers; and
4.	what your CoC does in response to households requesting emergency transfers.

(limit 2,500 characters)

1) NC-504 adopted a VAWA-compliant Emergency Transfer (ET) Plan, (updated in 2022) and all CoC and ESG funded agencies are required to follow the ET Plan which is delineated in the NC-504 Written Standards.

2) All persons are notified in writing of their occupancy rights under VAWA during program intake, program denial, exit or termination regardless of known survivor status, gender identity or expression. Victim’s rights for an ET are reviewed in detail.

3) A tenant who is a victim of domestic violence, dating violence, sexual assault or stalking, as defined in the VAWA Act of 2022, is eligible for an ET if the tenant reasonably believes that there is a threat of imminent harm of further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period immediately preceding a request for an emergency transfer. Tenants who are not in good standing may still request an ET if they meet the eligibility requirements. Tenants must notify the agency (oral or written) of the request for an ET and an agency must provide reasonable accommodations for individuals with disabilities or translation services, if needed. The ET request must include a statement expressing reasonable belief that there is a threat of imminent harm from further violence if the tenant remains in the same dwelling unit assisted under the agency’s housing program.

4) To respond to a request for an ET, the NC-504 ET Plan describes the process agencies must undertake (internal/external transfer, lease bifurcation, etc.) and the required documentation necessary to effectuate the ET request. If an agency is unable to affect an internal transfer quickly and safely, they must initiate an external transfer of the tenant to another unit. If the tenant reasonably believes any proposed transfer would not be safe, they may request transfer to another available unit. In the absence of internal unit availability, the agency will contact the local DV provider, Family Services of the Piedmont (FSP), and the Coordinated Entry Lead, to assist with an external transfer who may have a safe, available unit. The ET may also include moving into FSP’s Emergency Shelter until safe housing can be obtained, which may include moving the client to another geographic area for safety and particularly if the victim has support systems elsewhere outside the CoC.

1C-5e.	Facilitating Safe Access to Housing and Services for Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.	
	NOFO Section V.B.1.e.	

Describe in the field below how your CoC ensures households experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking have safe access to all of the housing and services available within your CoC’s geographic area.

**(limit 2,500 characters)**



NC-504 requires funded agencies to participate in Coordinated Entry (CE) and they must adhere to the CE policies, protocols, and procedures to ensure survivors of domestic violence, sexual assault, or stalking and human trafficking have safe and equitable access to all housing and services in the CoC. All CE participating agencies must assess and assist survivors, regardless of access point, with safety planning, connection to supportive/victim services if requested, assessment, and appropriate housing/shelter referral for which they may be eligible. The CoC in collaboration with Family Services of the Piedmont (FSP), the local victim service organization, provides annual training to ensure CE assessors and intake staff utilize a trauma-informed client-centered approach and that confidentiality requirements are met to ensure survivors can safely and confidentially complete intakes and assessments. The NC-504 Written Standards were revised in 2024 to also require all CoC and ESG funded agencies to adopt a Trauma-Informed approach to service delivery in all operations. All program participants in the NC-504 CE system, regardless of survivor status, use the same assessment tool (VI-SPDAT) and if needed, a lethality assessment, to assure that safety planning and connection to crisis services occur. Consequently, households experiencing trauma or a lack of safety related to fleeing/attempting to flee are enrolled in the CE System and eligible for all housing programs based on the same criteria and prioritization as all other households in the CoC. To address immediate safety concerns, those households may also be referred to the Family Service of the Piedmont Victim Service Shelter to provide additional Victim Services/court advocacy and act as a bridge to safe and affordable permanent housing. Dedicated victim services available include protective orders, court advocacy and support groups, and/or referrals for legal services to Legal Aid, Elon Law and the Children’s Law Center of NC, as part of FSP’s role as the Victim Services provider at the Guilford County Family Justice Center.

1C-5f.	Identifying and Removing Barriers for Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.	
	NOFO Section V.B.1.e.	
	Describe in the field below how your CoC ensures survivors receive safe housing and services by:	
1.	identifying barriers specific to survivors; and	
2.	working to remove those barriers.	

(limit 2,500 characters)

1) NC-504 has collaborated with victim services providers and identified systemic barriers specific to survivors and those experiencing victimization. These barriers are found embedded within social structures and institutions that prevent access or opportunities to achieve equitable outcomes for survivors that may be similarly reflected in the homeless response system. Persons fleeing or attempting to flee violence have negligible access to tangible protection in the court system, are dismissed by untrained law enforcement when seeking assistance/protective orders, and when finding themselves in the cycle of abuse, are stigmatized for needing assistance and protection from their abuser/aggressor or for not 'saving themselves'. These barriers often minimize the effects of trauma and often lead to re-traumatization. The homelessness response system unlike most societal institutions, has an expectation of constant engagement for persons experiencing homelessness and all services/opportunities are client-centered, trauma informed, and without preconditions. In this way, the CoC's response system is able to address the systemic barriers survivors often experience when seeking assistance from core institutions, as engagement in the homeless response system exists on a continuum.

2) NC-504 has addressed some of the barriers experienced by survivors by collaborating with the victim service providers, Family Service of the Piedmont (FSP), and the Family Justice Center (FJC), to support awareness initiatives, offer training, education materials, ensuring access points are universally available, and mandating a trauma informed-client centered approach to enhance support and address the unique barriers of survivors. Guilford County FJC provides assistance with navigating large institutions like the court system, where barriers often compromise safety and fail to address a victim's immediate needs. The CoC can be more responsive, adaptive, and intuitive to survivor's needs and work to inform, educate and advocate on how the CoC's approach can mitigate barriers inherent in the system by supporting trauma-informed environments.

1C-6.	Addressing the Needs of Lesbian, Gay, Bisexual, Transgender and Queer+--Anti-Discrimination Policy and Equal Access Trainings.	
	NOFO Section V.B.1.f.	

1.	Did your CoC implement a written CoC-wide anti-discrimination policy ensuring that LGBTQ+ individuals and families receive supportive services, shelter, and housing free from discrimination?	Yes
2.	Did your CoC conduct annual CoC-wide training with providers on how to effectively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity (Equal Access Final Rule)?	Yes
3.	Did your CoC conduct annual CoC-wide training with providers on how to effectively implement Equal Access in Accordance With an Individual's Gender Identity in Community Planning and Development Programs (Gender Identity Final Rule)?	Yes

1C-6a.	Anti-Discrimination Policy--Updating Policies--Assisting Providers--Evaluating Compliance--Addressing Noncompliance.	
	NOFO Section V.B.1.f.	

Describe in the field below:

1.	how your CoC regularly collaborates with LGBTQ+ and other organizations to update its CoC-wide anti-discrimination policy, as necessary to ensure all housing and services provided in the CoC are trauma-informed and able to meet the needs of LGBTQ+ individuals and families;
2.	how your CoC assisted housing and services providers in developing project-level anti-discrimination policies that are consistent with the CoC-wide anti-discrimination policy;
3.	your CoC's process for evaluating compliance with your CoC's anti-discrimination policies; and
4.	your CoC's process for addressing noncompliance with your CoC's anti-discrimination policies.

**(limit 2,500 characters)**

1) NC-504 collaborated with LGBTQ+ specific and other social justice organizations to update the CoC-wide anti-discrimination policy in to promote trauma-informed care and meet the needs of LGBTQ+ individuals and families in 2024. The CoC recently created the Justice, Equity, Diversity, Inclusion and Belonging Committee/People With Lived Experience (JEDI-B/PWLE) Advisory Board to provide ongoing input and ensure the CoC is addressing any non-compliance to protect the rights of the LGBTQ+ population and promote a trauma-centered approach. The CoC-wide anti-discrimination policy and the adoption of a trauma-informed approach in the provision of services/housing in the Written Standards, work to support the needs of the LGBTQ+ community.

2) NC-504 Written Standards outlines the CoC-wide anti-discrimination and Equal Access/Gender Identity Rule policies and procedures requirements for funded agencies. The CoC approved an updated Anti-Discrimination Policy in August of 2024. The CoC passes down these requirements to housing/services providers who must adopt in their own agency policies/program operations. Technical assistance, training, and sample policy language is provided, if needed, for developing project level anti-discrimination and Equal Access/Gender Identity policies and procedures.

3) The CoC monitors funded agencies at least annually within NC-504 to ensure there is adherence to NC-504 Written Standards of anti-discrimination and Equal Access/Gender Identity policies and procedures. To do this, the policies/procedures/operations manuals, intake procedures and case notes of the individual agency are reviewed to ensure that no client rights are being violated. The JEDI-B/PWLE Committee plans to address compliance of the anti-discrimination policies by evaluating not only the written policy, but adherence by agencies to the principles in practice, identifying areas for improvement, and assessing the impact of anti-discrimination initiatives on client experiences/outcomes.

4) The CoC's process for addressing noncompliance with project level anti-discrimination and equal access policies is through at least annual monitoring by the CoC. Projects and/or organizations may be offered a corrective action plan to amend noncompliance. Further processes for noncompliance may be introduced by the JEDI-B/PWLE Committee in collaboration with the LGBTQ+ advocates and social justice organizations.

1C-7.	Public Housing Agencies within Your CoC's Geographic Area--New Admissions--General/Limited Preference--Moving On Strategy.
	NOFO Section V.B.1.g.

You must upload the PHA Homeless Preference\PHA Moving On Preference attachment(s) to the 4B. Attachments Screen.

Enter information in the chart below for the two largest PHAs highlighted in gray on the current CoC-PHA Crosswalk Report or the two PHAs your CoC has a working relationship with—if there is only one PHA in your CoC’s geographic area, provide information on the one:

Public Housing Agency Name	Enter the Percent of New Admissions into Public Housing or Housing Choice Voucher Program During FY 2023 who were experiencing homelessness at entry	Does the PHA have a General or Limited Homeless Preference?	Does the PHA have a Preference for current PSH program participants no longer needing intensive supportive services, e.g., Moving On?
High Point Housing Authority	40%	Yes-Both	No
Greensboro Housing Authority	17%	Yes-Both	No

1C-7a.	Written Policies on Homeless Admission Preferences with PHAs. NOFO Section V.B.1.g.	
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Describe in the field below:

- steps your CoC has taken, with the two largest PHAs within your CoC’s geographic area or the two PHAs your CoC has working relationships with, to adopt a homeless admission preference—if your CoC only has one PHA within its geographic area, you may respond for the one; or
- state that your CoC has not worked with the PHAs in its geographic area to adopt a homeless admission preference.

(limit 2,500 characters)

1) NC-504 continues to collaborate with Public Housing Authorities (PHA), Greensboro Housing Authority (GHA) and the Housing Authority of the City High Point (HPHA), to support individuals and families that are experiencing homelessness, and coordinate with CE system providers to serve eligible households through the established homeless preferences at the PHAs. The GHA is a PSH provider that operates two CoC-funded housing projects and is utilizing Housing Choice Vouchers (HCV) to assist eligible program participants at enrollment and to assist participants to Move-On when supportive services are no longer needed/desired. The CoC is actively working with the GHA to formalize the Move-On strategy that is currently being utilized by GHA for households no longer requiring services and transition into other housing projects to increase positive exit to housing with assistance. The CoC and the PHAs are using the “Public Housing Agencies Move-On How To Guide” commitment letter templates to formalize the partnership with the CoC and should have the agreement finalized by December 2024. GHA and HPHA also consider other voucher programs for clients, when appropriate (i.e. EHV, FUP, VASH, etc.). NC-504 and City of High Point have been engaging HPHA about dedicating some Project Based Vouchers (PBV) to help support and enhance housing opportunities in the CoC. GHA also has Housing Opportunities for Persons With HIV/Aids (HOPWA) vouchers which are appropriate for those that are diagnosed with HIV/Aids but may not be directed to persons experiencing homelessness who may otherwise be eligible. Utilization of HOPWA vouchers by the CoC, when paired with Supportive Services, would expand financial assistance available to support the homeless response system. GHA continues to be an active member within the CoC in various capacities (i.e. Committees, CE, Membership, PSH provider, and the Governance Board).

2) Not applicable.

<b>1C-7b.</b>	<b>Moving On Strategy with Affordable Housing Providers.</b>	
	Not Scored–For Information Only	

Select yes or no in the chart below to indicate affordable housing providers in your CoC's jurisdiction that your recipients use to move program participants to other subsidized housing:

1.	Multifamily assisted housing owners	Yes
2.	PHA	Yes
3.	Low Income Housing Tax Credit (LIHTC) developments	Yes
4.	Local low-income housing programs	Yes
	Other (limit 150 characters)	
5.		

<b>1C-7c.</b>	<b>Include Units from PHA Administered Programs in Your CoC's Coordinated Entry.</b>	
	NOFO Section V.B.1.g.	

In the chart below, indicate if your CoC includes units from the following PHA programs in your CoC's coordinated entry process:

1.	Emergency Housing Vouchers (EHV)	Yes
2.	Family Unification Program (FUP)	Yes
3.	Housing Choice Voucher (HCV)	Yes
4.	HUD-Veterans Affairs Supportive Housing (HUD-VASH)	Yes
5.	Mainstream Vouchers	No
6.	Non-Elderly Disabled (NED) Vouchers	Yes
7.	Public Housing	Yes
8.	Other Units from PHAs:	
	Greensboro Housing Authority CoC PSH	Yes

1C-7d.	Submitting CoC and PHA Joint Applications for Funding for People Experiencing Homelessness. NOFO Section V.B.1.g.	
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1.	Did your CoC coordinate with a PHA(s) to submit a competitive joint application(s) for funding or jointly implement a competitive project serving individuals or families experiencing homelessness (e.g., applications for mainstream vouchers, Family Unification Program (FUP), other programs)?	No
		Program Funding Source
2.	Enter the type of competitive project your CoC coordinated with a PHA(s) to submit a joint application for or jointly implement.	n/a

1C-7e.	Coordinating with PHA(s) to Apply for or Implement HCV Dedicated to Homelessness Including Emergency Housing Voucher (EHV). NOFO Section V.B.1.g.	
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	Did your CoC coordinate with any PHA to apply for or implement funding provided for Housing Choice Vouchers dedicated to homelessness, including vouchers provided through the American Rescue Plan?	Yes
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## 1D. Coordination and Engagement Cont'd

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

1D-1.	Preventing People Transitioning from Public Systems from Experiencing Homelessness.	
	NOFO Section V.B.1.h.	

Select yes or no in the chart below to indicate whether your CoC actively coordinates with the public systems listed to ensure persons who have resided in them longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs.

1.	Prisons/Jails?	Yes
2.	Health Care Facilities?	Yes
3.	Residential Care Facilities?	Yes
4.	Foster Care?	Yes

1D-2.	Housing First—Lowering Barriers to Entry.	
	NOFO Section V.B.1.i.	

1.	Enter the total number of new and renewal CoC Program-funded PSH, RRH, SSO non-coordinated entry, Safe Haven, and Transitional Housing projects your CoC is applying for in FY 2024 CoC Program Competition.	13
2.	Enter the total number of new and renewal CoC Program-funded PSH, RRH, SSO non-coordinated entry, Safe Haven, and Transitional Housing projects your CoC is applying for in FY 2024 CoC Program Competition that have adopted the Housing First approach.	13
3.	This number is a calculation of the percentage of new and renewal PSH, RRH, SSO non-Coordinated Entry, Safe Haven, and Transitional Housing projects the CoC has ranked in its CoC Priority Listing in the FY 2024 CoC Program Competition that reported that they are lowering barriers to entry and prioritizing rapid placement and stabilization to permanent housing.	100%

1D-2a.	Project Evaluation for Housing First Compliance.	
	NOFO Section V.B.1.i.	

You must upload the Housing First Evaluation attachment to the 4B. Attachments Screen.  
 Describe in the field below:

1.	how your CoC evaluates every project—where the applicant checks Housing First on their project application—to determine if they are using a Housing First approach;
2.	the list of factors and performance indicators your CoC uses during its evaluation;
3.	how your CoC regularly evaluates projects outside of your local CoC competition to ensure the projects are using a Housing First approach; and
4.	what your CoC has done to improve fidelity to Housing First.

**(limit 2,500 characters)**

1) The System Performance & Evaluation (SPE) Committee evaluates every project that receives CoC funding and ensures adherence to the Housing First model, by using a comprehensive scorecard during the application process that captures the Section 3B responses and compares these responses to the NC-504 Housing First Assessment conducted outside the competition period (February-June) for existing CoC funded agencies. New Agencies were evaluated using the same Housing First Assessment which was completed as part of the application process. New and renewal projects were scored based on the assessment results and scorecard criteria equally.

2) The SPE Committee scorecard enabled review of performance indicators for renewals, (termination, start date to lease-up, etc). The scorecard evaluated the responses to application questions: that participants are not screened out based on too little or no income, active or history of substance use, having criminal record with exceptions for state mandated restrictions and history of domestic violence and that participants are not terminated from the program for, failure to participate in supportive services, failure to make progress on a service plan, loss of income or failure to improve income and/or being a victim of domestic violence.

3) The CoC conducts a Housing First Assessment and onsite monitoring visits annually using CPD monitoring exhibits, review of client files, review of operations manuals/intake procedures and meeting with each agency at the conclusion to discuss findings and concerns and if necessary, a corrective action plan. Housing First and Equal Access policy review, client file audit checklists, CE referral/housing placement data, and the agencies' project rules are monitored for Housing First compliance using the Housing First Assessment Tool and a report is provided to the agency.

4) To improve fidelity to Housing First, the Coordinated Entry (CE) Committee regularly staffs barriers in the system to ensure people are housed quickly and effectively and are not terminated from programs or return to homelessness. NC-504 will continue to conduct the Housing First Assessment for all funded and new applicant agencies to continue to address barriers in the system, eligibility requirements from agencies for admission, and review operations manuals and practices to ensure Housing First compliance. NC-504 will provide technical assistance to ensure all project's maintain fidelity to Housing First.

1D-3.	Street Outreach—Data—Reaching People Least Likely to Request Assistance.
	NOFO Section V.B.1.j.

Describe in the field below how your CoC tailored its street outreach to people experiencing homelessness who are least likely to request assistance.
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**(limit 2,500 characters)**

NC-504 agencies conducting targeted outreach, provide direct access to services and resources for those least likely to seek assistance that are experiencing homelessness. The Interactive Resource Center (IRC) Projects Assistance in Transition from Homelessness (PATH) team, Greensboro Police Department Behavioral Health Response Team (BHRT), Tiny House Community Development (THCD), Guilford County Solution to the Opioid Problem (GCSTOP), Support Team Assisted Response (STAR), Faith-based Street Outreach teams, and dedicated Veterans Assistance (VA) Street Outreach and the Coordinated Entry team, provide street outreach services to targeted sub-populations. Social Workers Engaging Local Libraries (SWELL) is another partnership between the libraries in the City of Greensboro and City of High Point to assist those who are experiencing homelessness with mental health and substance use needs. This partnership developed out of an expressed need for assistance from the library administration to assist with the bio-psycho-social needs of patrons presenting at the library. PATH provides outreach to those experiencing homelessness with severe persistent mental illness and BHRT, a multidisciplinary outreach team, includes mental health counselors, case managers, and specially trained law enforcement officers that provide mental health services/crisis response and has expanded their staff to include Homeless Support Specialist to facilitate connections to resources for the unsheltered. THCD is the dedicated CoC Street Outreach team that covers the geographical area in coordination with the other outreach teams. GCSTOP provides post-overdose response, substance abuse prevention, disburses Narcan, clean syringes/harm reduction interventions to support individuals involved in the justice system and community outreach services at no cost. STAR supports those in need of behavioral/medical health crisis assistance in a nonviolent situation deemed by the local police department that can provide individuals with information regarding shelter, food, counseling, and medication as necessary. The teams provide supplies/services and make efforts to build rapport with those they engage. Street Outreach teams utilize the CE access points and HMIS to document contacts and map locations of unsheltered persons. Designated team members attend CE Workgroups weekly and Street Outreach collaborative bi-weekly to discuss data/trends, clients, and locations for continuous engagement.

1D-4.	Strategies to Prevent Criminalization of Homelessness.	
	NOFO Section V.B.1.k.	

Select yes or no in the chart below to indicate your CoC's strategies to prevent the criminalization of homelessness in your CoC's geographic area:

	Your CoC's Strategies	Engaged/Educated Legislators and Policymakers	Implemented Laws/Policies/Practices that Prevent Criminalization of Homelessness
1.	Increase utilization of co-responder responses or social services-led responses over law enforcement responses to people experiencing homelessness?	Yes	Yes
2.	Minimize use of law enforcement to enforce bans on public sleeping, public camping, or carrying out basic life functions in public places?	Yes	Yes

3.	Avoid imposing criminal sanctions, including fines, fees, and incarceration for public sleeping, public camping, and carrying out basic life functions in public places?	Yes	No
4.	Other:(limit 500 characters)		

1D-5.	Rapid Rehousing–RRH Beds as Reported in the Housing Inventory Count (HIC) or Longitudinal Data from HMIS.	
	NOFO Section V.B.1.i.	

		HIC Longitudinal HMIS Data	2023	2024
	Enter the total number of RRH beds available to serve all populations as reported in the HIC or the number of households served per longitudinal HMIS data, e.g., APR.	HIC	79	96

1D-6.	Mainstream Benefits–CoC Annual Training of Project Staff.	
	NOFO Section V.B.1.m.	

Indicate in the chart below whether your CoC trains program staff annually on the following mainstream benefits available for program participants within your CoC's geographic area:

	Mainstream Benefits	CoC Provides Annual Training?
1.	Food Stamps	Yes
2.	SSI–Supplemental Security Income	Yes
3.	SSDI–Social Security Disability Insurance	Yes
4.	TANF–Temporary Assistance for Needy Families	Yes
5.	Substance Use Disorder Programs	Yes
6.	Employment Assistance Programs	Yes
7.	Other (limit 150 characters)	
	Medicaid Expansion Enrollment and ACA Insurance	Yes

1D-6a.	Information and Training on Mainstream Benefits and Other Assistance.	
	NOFO Section V.B.1.m	

Describe in the field below how your CoC:

1. works with projects to collaborate with healthcare organizations, including those that provide substance use disorder treatment and mental health treatment, to assist program participants with receiving healthcare services, including Medicaid; and
2. promotes SSI/SSDI Outreach, Access, and Recovery (SOAR) certification of program staff.

**(limit 2,500 characters)**

1) NC-504 collaborates with healthcare and mental health/substance abuse organizations and providers such as Cone Health, Behavioral Health Urgent Care, Guilford Community Care Network (GCCN), Triad Adult and Pediatric Medicine, the Family Services of the Piedmont Clinic located inside the Interactive Resource Center day services center, Minerva Mobile Health Unit, and Guilford County Solution to the Opioid Problem (GCSTOP), a harm reduction organization. NC-504 ensures connections for street outreach and homeless service providers to have direct access to resources both on-site at provider locations and in the field for outreach teams. As NC became a Medicaid expansion state in 2023-24, these collaborations are even more important to assist clients in obtaining primary, behavioral, and specialty health care (dentist, OBGYN), alcohol/substance use treatment mental health and psychiatry medication management services through the GCCN (Orange Card). NC-504 collaborated/participated in the coordination of the community Mental Health Festival (May 2024) which was advertised widely across the CoC with over forty-five community partners. During Hunger and Homelessness Awareness Week (Nov. 2024), NC-504 is partnering with the Behavioral Health Response Team (BHRT) to provide mobile clinics that conduct tests, screenings, treatment, mobile vision clinics for eye exams, and mobile dental clinics to expand access sites/locations within the CoC.

2) As the CoC Lead agency, Guilford County is an internal partner to Guilford County Department of Health and Human Services. NC-504 is able to provide mainstream benefits trainings in both May 2024 and June 2024 (Medicaid, Work First, Subsidized Childcare Assistance, SNAP, and SOAR/SSI/SSDI) in partnership with DHHS to all member agencies and staff. The training was designed to increase knowledge of federal benefits/ entitlements including eligibility, income requirements, and applications processes. SOAR workers are active partners in the CoC, few in number, but participate in Coordinated Entry access sites throughout the community to help connect program participants benefits. The CoC is engaged in recruitment and expansion of SOAR certified staff as courses may be completed on-line at reasonable costs, but there are additional restrictions for certification in NC as all SOAR workers must also be approved by the North Carolina Coalition Against Homelessness who has not fully reactivated its SOAR process since 2020.

ID-7.	Partnerships with Public Health Agencies–Collaborating to Respond to and Prevent the Spread of Infectious Diseases.	
	NOFO Section V.B.1.n.	
	Describe in the field below how your CoC effectively collaborates with state and local public health agencies to develop CoC-wide policies and procedures that:	
1.	respond to infectious disease outbreaks; and	
2.	prevent infectious disease outbreaks among people experiencing homelessness.	

**(limit 2,500 characters)**

1) NC-504 has an Infectious Disease Taskforce in partnership with the Public Health Department (PHD) which includes shelter providers, housing case managers, Coordinated Entry staff, SOAR Social Workers, the CoC Lead and those serving specialized populations (i.e. HIV/AIDS, Youth, Veterans, DV, unhoused). The Public Health Department in collaboration with the CoC has developed a pandemic/emergency preparedness response plan for infectious disease outbreaks and continues to work with the congregate shelters to ensure proper isolation/quarantine guidelines are followed and will assist with any crisis measures required to ensure an effective response to infectious disease for those that are experiencing homelessness. The Public Health Department has completed on-site evaluations with shelters in the CoC to offer infectious disease prevention recommendations based on space and accommodations, assess isolation options in case an infectious disease outbreak occurs within the congregate shelter setting, and help providers develop a plan of action in the event of an outbreak. The Public Health Department also provides accessible mobile clinics to outreach within the geographical area for those that are experiencing homelessness, underserved/underrepresented, limited transportation and limited access to services.

2) NC-504 continues to enhance collaborations between homeless service providers and health professionals to decrease the spread of infectious disease within our community and those experiencing homelessness. On Tuesdays at High Point Library/Coordinated Entry Access Point there is a medical provider from Atrium Health to provide basic first aid, over the counter medications, answer medical questions as requested and refer clients to primary care or medical providers as needed. The Minerva Mobile Clinic through the University of North Carolina at Greensboro partners with Tiny House Community Development and other providers to provide direct medical services to those experiencing homelessness. Guilford County Solution to the Opioid Problem (GCSTOP) collaborates closely with the Coordinated Entry team/ Street Outreach teams to support harm reduction efforts and to prevent infectious disease transmission by means of sterile needles, safe smoking supplies, and cleaning/hygiene supplies. Moses Cone Congregational Nurses also provides basic first aid and medical referrals for vaccines/testing to prevent infectious disease outbreaks at congregate shelters.

ID-7a.	Collaboration With Public Health Agencies on Infectious Diseases.	
	NOFO Section V.B.1.n.	
	Describe in the field below how your CoC:	
1.	effectively shared information related to public health measures and homelessness; and	
2.	facilitated communication between public health agencies and homeless service providers to ensure street outreach providers and shelter and housing providers are equipped to prevent or limit infectious disease outbreaks among program participants.	

(limit 2,500 characters)

1) NC-504 continues to maintain the CoC Infectious Disease Taskforce, initially implemented as a response to COVID-19, as a response to infectious disease outbreaks that may occur for those who are experiencing homelessness. The Taskforce members include the CoC, congregate/day shelters, homeless service providers, the Guilford County Public Health Department, and staff from the municipalities in the cities of Greensboro and High Point. The role of the Taskforce is to develop specific policies based on guidance and data on the efficacy of practices implemented as a result of the COVID-19 pandemic and apply those practices to other infectious diseases. The Taskforce meets at-least bi-monthly to share and analyze information including HUD Resources (Prevention Strategies for Homeless Shelters, Infectious Disease Toolkit for CoCs), HUD Infection Control and Winter Planning Modules, and CDC resources including COVID-19 planning and other infectious disease prevention strategies for Monkey Pox, Flu, and sexually transmitted diseases.

2) NC-504 facilitates conversations, engages in data sharing, shares best practices, and sponsors presentations and provides information updates between Guilford County Public Health Department (PHD), homeless providers, agencies serving specialized populations (HIV/AIDS, Youth, Veterans), and Street Outreach teams. Triad Health Project is available to provide training and share information on their services including prevention of infectious disease/treatment of HIV/AIDS and to collaborate with shelters for clients that may have not been connected to treatment and/or quarantine space. Guilford County Solution to the Opioid Problem (GCSTOP) support harm reduction efforts to prevent infectious disease transmission by distribution of sterile needles, safe smoking supplies, and cleaning/hygiene supplies and provide information on harm reduction/disease prevention to providers. The Public Health Department works with the CoC to provide trainings and information at community events and CoC meetings. The CoC and public health agencies work together to ensure that clients have continuity of care and prevention strategies are effectively implemented in the CoC.

1D-8.	Coordinated Entry Standard Processes.	
	NOFO Section V.B.1.o.	

Describe in the field below how your CoC's coordinated entry system:	
1.	can serve everybody regardless of where they are located within your CoC's geographic area;
2.	uses a standardized assessment process to achieve fair, equitable, and equal access to housing and services within your CoC;
3.	collects personal information in a trauma-informed way; and
4.	is updated at least annually using feedback received from participating projects and households that participated in coordinated entry.

(limit 2,500 characters)

- 1) NC-504 Coordinated Entry (CE) system utilizes access points, service hotline number and dedicated email to ensure community members in Guilford County have access housing and services. The CoC utilizes social media to advertise the nine CE access point locations, hotline number and email. Community partners are provided with marketing material/flyers to disburse at agencies and businesses. CoC Street Outreach (SO) teams engage people at encampments, abandoned buildings, known locations to provide resources, information and complete CE assessments.
- 2) All parties across the CoC, including the Coordinated Entry (CE) system, Street Outreach teams and local hospitals, utilize the VI-SPDAT as the standardized prioritization tool to achieve fair, equitable and equal access to housing and services. Once the completed VI-SPDAT is sent to the CE Lead agency, Partners Ending Homelessness (PEH), they follow-up with the client within 90 days to ensure that the information from the assessment is accurate and up to date. CE Assessors, as well as housing case managers and CoC Lead staff, meet weekly for CE Case Conferencing to discuss By-Name- List updates, warm hand-offs between Street Outreach staff and housing providers, and any changes in processes as well as concerns or issues with standardization across the CoC. CE ensures there is a special process for victims of domestic violence to ensure confidentiality and safety is maintained. The CE focuses on prevention and diversion and offers clients available housing resources such as shelters, while they may be waiting to be housed.
- 3) NC-504 CoC prioritizes trauma-informed care in the CE system to ensure all CoC providers (program staff, CE assessors, SO workers, etc) collect information in a manner that minimizes trauma, is sensitive to the client's needs, and is in a safe/supportive environment. Family Services of Piedmont will be providing annual training on best practices in utilizing trauma-informed care in CE.
- 4) The CE Committee recently completed the annual CE Evaluation, which included a survey of participating projects and households involved, or previously involved, in the CE System. All feedback from clients and projects is forwarded to the CoC Lead in order to further identify strengths and gaps in our local CE system. Additionally, the CE Committee meets at least once per month to address disparities in the CE system and brainstorm potential solutions for improvement to propose to CoC Membership.

1D-8a.	Coordinated Entry–Program Participant-Centered Approach.	
	NOFO Section V.B.1.o.	
	Describe in the field below how your CoC's coordinated entry system:	
	1. reaches people who are least likely to apply for homeless assistance in the absence of special outreach;	
	2. prioritizes people most in need of assistance;	
	3. ensures people most in need of assistance receive permanent housing in a timely manner, consistent with their needs and preferences; and	
	4. takes steps to reduce burdens on people seeking assistance.	

**(limit 2,500 characters)**

1) The CoC Coordinated Entry (CE) process reaches those who are least likely to apply for homeless assistance by means of Street Outreach (SO), referrals, and expanded access points. SO teams complete regular surveying of areas where unsheltered individuals may live, including parks, overpasses, and abandoned buildings. CE and SO receive referrals from community agencies, city and county leadership/elected officials, hospitals, outpatient healthcare, and County departments. NC-504 continues to work with County Animal Services (GCAS) to ensure that when individuals surrender their pets due to eviction, homelessness, and/or fleeing DV, they can be referred for CE services. In addition, NC-504 is establishing stronger relationships with the Faith-based community who regularly offers donation items/meals for events or the unsheltered. This collaboration provides opportunities to: identify persons needing assistance, available housing and services, and ways to become involved within the CoC.

2) The CE system prioritizes those in most need via the standardized assessment (VI-SPDAT). The VI-SPDAT is completed at entry into CE and updated as needed or on a quarterly basis to assess for updates. The VI-SPDAT provides a prioritization ranking for the By-Name List (BNL) to effectively serve those with the most barriers and highest needs to housing.

3) The goal of the BNL prioritization process is to provide safe housing to individuals and families most in need of assistance in a timely manner, consistent with their preferences, including youth families, families with children, and seniors. NC-504 agencies collaboratively address these needs on a priority basis, including payment for hotel stays if safe shelter is not available, working with DSS and the PHA on Family Unification Vouchers for families and coordinating warm hand-for appropriate referrals. CoC Lead works to navigate providers referrals in cases where there is a safety risk related to health, age, children, DV, and other highly sensitive needs.

4) To decrease burdens accessing CE, NC-504 provides multiple access sites for housing and service needs. NC-504 CE assessors and Street Outreach teams also utilize a trauma-informed approach during intake and assessments, not asking invasive questions, and only asking questions required for eligibility. NC-504 emphasizes that services provided are program participant-directed, respectful of individuals' right to self-determination, and voluntary.

1D-8b.	Coordinated Entry—Informing Program Participants about Their Rights and Remedies—Reporting Violations.	
	NOFO Section V.B.1.o.	
	Describe in the field below how your CoC through its coordinated entry:	
1.	affirmatively markets housing and services provided within the CoC's geographic area and ensures it reaches all persons experiencing homelessness;	
2.	informs program participants of their rights and remedies available under federal, state, and local fair housing and civil rights laws; and	
3.	reports any conditions or actions that impede fair housing choice for current or prospective program participants to the jurisdiction(s) responsible for certifying consistency with the Consolidated Plan.	

**(limit 2,500 characters)**

1) NC-504 affirmatively markets housing and service opportunities to all persons experiencing homelessness in the geographic area and ensures outreach regardless of race, color, national origin, religion, sex (gender identity/sexual orientation), age, familial status or disability, in compliance with the Fair Housing Act (FHA) and consistent with Affirmatively Furthering Fair Housing (AFFH) requirements for CPD recipients. NC-504 provides annual training on the FHA, Equal Access Rule and Involuntary Family Separation to ensure staff understand local and federal fair housing laws and how to inform participants on how to report violations. The CoC works to mitigate inequity in fair housing through collaboration with UNCG’s Center for Housing and Community Studies (CHCS), Legal Aid of NC, Greensboro Housing Coalition, and the Guilford County Reentry program.

2) NC-504 has partnered with the Tenant Education, Advocacy and Mediation (TEAM) Project to address tenant rights and remedies under local and federal laws. The TEAM project is a collaboration between the Legal Aid of NC Greensboro office and CHCS to inform/educate clients threatened with eviction of their rights, how to file an appeal, and provide legal services as needed. The TEAM Project also has a Tenant Leadership Academy which offers workshops surrounding tenant rights/responsibilities, advocacy, and how to form a tenant alliance. Greensboro Housing Coalition (GHC) provides free HUD certified counseling around fair housing protections and a housing hotline to provide timely service and support. The CoC continues to collaborate with the City of Greensboro Fair Housing Division to provide annual training on local and federal fair housing laws. This event was open to the public and accessibility to all community members. The training was advertised in CoC meetings, newsletter, calendar and website.

3) In Greensboro, fair housing and housing discrimination complaints can be reported to the Human Rights Department to investigate housing discrimination. Reports can be filed by phone, email or via an online form. In High Point, reports to the office are considered “inquiries” in which the High Point Human Relations can perform duties under the Alternative Dispute regulations. Any official discrimination claim is filed with the North Carolina Human Relations Department for Fair Housing. The City of High Point is currently working on being approved to accept reports and investigate housing discrimination.

1D-9.	Advancing Racial Equity in Homelessness—Conducting Assessment.	
	NOFO Section V.B.1.p.	

1.	Has your CoC conducted a racial disparities assessment in the last 3 years?	Yes
2.	Enter the date your CoC conducted its latest assessment for racial disparities.	10/31/2022

1D-9a.	Using Data to Determine if Racial Disparities Exist in Your CoC’s Provision or Outcomes of CoC Program-Funded Homeless Assistance.	
	NOFO Section V.B.1.p.	



	Describe in the field below:
1.	the data your CoC used to analyze whether any racial disparities are present in your CoC's provision or outcomes of CoC Program-funded homeless assistance; and
2.	how your CoC analyzed the data to determine whether any racial disparities are present in your CoC's provision or outcomes of CoC Program-funded homeless assistance.

(limit 2,500 characters)

1) NC-504 conducted an Equity Analysis and issued a final Report in October of 2022 that included PIT, Census, and American Community Survey data for the CoC. As a result of the equity analysis and report, NC-504 built racial equity initiatives/strategies. Data collection continues through HMIS and the Point in Time (PIT) count. The Justice, Equity, Diversity, Inclusion and Belonging/People With Lived Experience (JEDI-B/PWLE) Committee was formed to achieve an understanding of how systemic racial justice and equity can be attained through collective, intentional, and data-informed inclusion and belonging strategies. JEDI-B/PWLE created a survey to understand how CoC members identify to ensure racial and ethnic diversity in CoC Leadership. Additionally, the JEDI-B/PWLE meetings have allowed members to share their individual identities and stories regarding race, class, and homelessness experience and how that led them to be involved in the CoC and their respective professions.

2) The Equity Analysis Report in 2022 reviewed racial disparities in the homelessness response system between 2018-2021. The Report identified a 39% increase of self-reported homelessness Black/African American/African individuals and households were 1.8 times more likely to be represented in the system compared to the housed population in the CoC. This report, as well as PIT/HIC data have informed the recent Needs and Gaps Analysis, the NC-504 Crosswalk, the Strategic Plan, policies, procedures, and governing documents. Black/African American/African people are continuously overrepresented among people experiencing homelessness compared to the overall (housed) population. Black, African American, and African people make up approximately 71% of people that accessed homeless programs but represent only an estimated 36% percent of the overall (housed) population. Black/African American/African households exited programs to permanent housing at a higher rate (59%) compared to Whites (45%), but Whites exited to an institutional setting at three times the rate (15%) of Black/African American/African clients (5%). However, Black/African American/African clients returned to homelessness from permanent housing at a higher rate than Whites. The JEDI-B/PWLE survey found that the committee is made up of Latinx, Black/African American/African, Bi-racial/multi-racial, Indigenous men and women which engendered exploration of systemic racism in the CoC and how to address barriers to equity.

1D-9b.	Implemented Strategies to Prevent or Eliminate Racial Disparities.	
	NOFO Section V.B.1.p	

Select yes or no in the chart below to indicate the strategies your CoC is using to prevent or eliminate racial disparities.

1.	Are your CoC's board and decisionmaking bodies representative of the population served in the CoC?	Yes
2.	Did your CoC identify steps it will take to help the CoC board and decisionmaking bodies better reflect the population served in the CoC?	Yes
3.	Is your CoC expanding outreach in your CoC's geographic areas with higher concentrations of underrepresented groups?	Yes
4.	Does your CoC have communication, such as flyers, websites, or other materials, inclusive of underrepresented groups?	Yes
5.	Is your CoC training staff working in the homeless services sector to better understand racism and the intersection of racism and homelessness?	Yes
6.	Is your CoC establishing professional development opportunities to identify and invest in emerging leaders of different races and ethnicities in the homelessness sector?	Yes
7.	Does your CoC have staff, committees, or other resources charged with analyzing and addressing racial disparities related to homelessness?	Yes
8.	Is your CoC educating organizations, stakeholders, boards of directors for local and national nonprofit organizations working on homelessness on the topic of creating greater racial and ethnic diversity?	Yes
9.	Did your CoC review its coordinated entry processes to understand their impact on people of different races and ethnicities experiencing homelessness?	Yes
10.	Is your CoC collecting data to better understand the pattern of program use for people of different races and ethnicities in its homeless services system?	Yes
11.	Is your CoC conducting additional research to understand the scope and needs of different races or ethnicities experiencing homelessness?	Yes
	Other:(limit 500 characters)	
12.	Guilford County Homelessness System and Housing and Resource Analysis Report (racial disparities and significant disproportionate power dynamics).	Yes

1D-9c.	Plan for Ongoing Evaluation of System-level Processes, Policies, and Procedures for Racial Equity.	
	NOFO Section V.B.1.p.	

Describe in the field below your CoC's plan for ongoing evaluation of system-level processes, policies, and procedures for racial equity.

(limit 2,500 characters)

The Justice, Equity, Diversity, Inclusion and Belonging and People With Lived Experience Committee (JEDI-B/PWLE), was established in August 2023 to evaluate the system-level processes, practice, policies and procedures through an equity lens for those who are working with who are experiencing homelessness in NC-504. JEDI-B/PWLE will partner with the NC-504 governance committee to review all foundational documents to identify gaps, needs and areas for enhancement with an equity and justice lens. The goal of the JEDI-B/PWLE is to develop a framework/best practice that is equitable, review the data (i.e. HMIS, data warehouse at Green River, CE, etc.) to evaluate the CoC funded agencies equity practices to offer an analysis of the system for standards and accountability for the CoC. The JEDI-B/PWLE will also partner with the System Performance Evaluation Committee (SPE) to evaluate CoC funded agencies through the monitoring/compliance process on conducted by the COC Lead on behalf of the CoC.

The CoC will evaluate the plan of action for on-going improvement of system-level processes, practices, policies and procedures for racial equity by: creating and distributing a survey designed for NC-504 funded organizations; data analysis of the system; review of data that funded agencies are/are not capturing and how that effects the system; and analyze existing policies and procedures against JEDI-B/PWLE criteria to identify barriers and address equity. Once the area for enhancement is determined there will be an implementation of the framework; training of funded agency staff; and ongoing monitoring with all funded agencies to ensure compliance of the NC-504 Written Standards. JEDI-B/PWLE committee will conduct at least an annual client survey to evaluate access to service delivery and the client's perception/experiences with the system can drive successful implementation of racial equity. NC-504 and Coordinated Entry Committee (CE) is in the process of determining a more equitable assessment tool to use other than VI-SPDAT in CE. The HMIS Committee and NC-504 are planning to create a streamlined collection of data by end users and evaluate data quality in the system to reflect more accurately within the system. The HMIS Lead has begun offering monthly office hours, trainings, reviewing data quality monthly, and offering technical assistance to agencies in the CoC.

1D-9d.	Plan for Using Data to Track Progress on Preventing or Eliminating Racial Disparities.	
	NOFO Section V.B.1.p.	
	Describe in the field below:	
1.	the measures your CoC plans to use to continuously track progress on preventing or eliminating racial disparities in the provision or outcomes of homeless assistance; and	
2.	the tools your CoC plans to use to continuously track progress on preventing or eliminating racial disparities in the provision or outcomes of homeless assistance.	

(limit 2,500 characters)

1) NC-504 updated the CoC’s Strategic Plan to reflect the 2023 Needs and Gaps Analysis that identified racial disparities in outcomes of homeless assistance within the CoC. NC-504 uses annual PIT data, American Community Survey/Census data and demographic reports in the CoC’s data warehouse at Green River to review system performance and racial disparities. HMIS Lead submits monthly reports to the CoC and committees for analysis of system data to capture racial equity disparities. The Coordinated Entry (CE) Assessors collect data and submit a system-wide report to the CoC to support ongoing work with the CE Committee and HUD Technical Assistance (Cloudburst) on an effective strategy to address racial equity disparities. The Justice, Equity, Diversity, Inclusion and Belonging/Persons With Lived Experience (JEDI-B/PWLE) committee has begun planning next steps to address disparities by updating CoC foundational documents, policies, procedures and practices from an equity lens. JEDI-B/PWLE will use Census data to assess disparities in the system by comparing the percent of race and ethnicity of the unhoused population. JEDI-B/PWLE will monitor access and engagement in services across all programs/agencies and evaluate enrollment and participation rates for different demographic groups to identify utilization barriers. Finally, JEDI-B/PWLE will measure the percentage of individuals from different racial and ethnic identity groups who achieve stable housing after receiving assistance from NC-504 to monitor housing stability and recidivism outcomes.

2) Due to inconsistency in data collection by end users and a need for expanded system-wide data analysis, NC-504 will plan to use the CoC Analysis Tool: Race and Ethnicity v4.0 to evaluate disparities. NC-504 HMIS committee and HMIS Lead have an action plan to more effectively collect and disseminate racial demographics that support engaging conversation and data that reflects the community. The CE Committee is working with HUD TA (Cloudburst) to develop a tool with an equity lens regarding the system. NC-504 attended a Green River training on a solution for data analysis within the data warehouse system and a CE Cohort tool to address the racial disparities in CE. JEDI-B/PWLE will also utilize the Racial Equity Tool by the Equity in the Center and Inclusion, Diversity, Equity, Ant-racism, System-thinking (IDEAS) by the National Low Income Housing Coalition to develop a framework to continuously track progress.

1D-10.	Involving Individuals with Lived Experience of Homelessness in Service Delivery and Decisionmaking—CoC’s Outreach Efforts.	
	NOFO Section V.B.1.q.	

Describe in the field below your CoC’s outreach efforts (e.g., social media announcements, targeted outreach) to engage those with lived experience of homelessness in leadership roles and decisionmaking processes.

(limit 2,500 characters)

NC-504 conducts regular outreach efforts in meetings, social media, peer outreach, and on the CoC’s website to engage People With Lived Experience (PWLE) of homelessness and domestic violence in leadership roles and in the decision-making processes to ensure the NC-504 system is client-centered, trauma-informed, low barrier and has effective supportive services. NC-504 staff have completed targeted outreach at community events to learn from persons with lived expertise to impart the value of their voice and encourage active involvement. The CoC incorporates this expertise to facilitate system-wide change and improvement. NC-504 engages PWLE for leadership roles on the CoC board, to review, revise, and improve the Written Standards, to participate in recruitment of other persons with lived expertise as members of the CoC, voting on methodology for the annual Point in Time Count, and voting on decisions that impact the homelessness response system as a whole. The NC-504 monitors agencies through the lens of inclusion of PWLE and agencies are required to have a seat on partner agencies’ board of directors to inform program design and implementation. Many agencies have taken this further in creating PWLE advisory boards to review their programs and policies at least annually, to ensure the agency and programs are remaining client centered, low barrier, and meeting the needs of clients. Additionally, NC-504 has partnered with Corporation for Supportive Housing (CSH) consultants who conducted agency and individual feedback sessions/advisory meetings with PWLE as well as published the opportunity for PWLE to apply to obtain reimbursement of up to \$7,000 for their participation over the next several months. Eighteen people applied and two were chosen. Those who were not selected for the initial financial incentive are still being considered for incorporation in different capacities. NC-504 has also been in collaboration with CSH to identify the county wide gaps for services to support improvements for serving persons experiencing homelessness. CSH conducted a survey to identify consultants within the community to provide thoughtful leadership and partnership as NC-504 cross-sector and cross-jurisdictional homelessness taskforce continues their work.

1D-10a.	Active CoC Participation of Individuals with Lived Experience of Homelessness.	
	NOFO Section V.B.1.q.	

You must upload the Lived Experience Support Letter attachment to the 4B. Attachments Screen.  
 Enter in the chart below the number of people with lived experience who currently participate in your CoC under the four categories listed:

	Level of Active Participation	Number of People with Lived Experience Within the Last 7 Years or Current Program Participant	Number of People with Lived Experience Coming from Unsheltered Situations
1.	Routinely included in the decisionmaking processes related to addressing homelessness.	7	12
2.	Participate on CoC committees, subcommittees, or workgroups.	13	12
3.	Included in the development or revision of your CoC’s local competition rating factors.	0	1
4.	Included in the development or revision of your CoC’s coordinated entry process.	8	6

1D-10b.	Professional Development and Employment Opportunities for Individuals with Lived Experience of Homelessness.	
	NOFO Section V.B.1.q.	

Describe in the field below how your CoC or CoC membership organizations provide professional development and employment opportunities to individuals with lived experience of homelessness.

**(limit 2,500 characters)**

NC-504 recognizes the value of residents’ lived experience navigating services and supports, and the importance of considering these experiences when structuring and refining the services in the community. Persons With Lived Experience (PWLE) are engaged as subject matter experts and contributors for NC-504 to understand the need, operation effectiveness or impact of a person-focused service. NC-504 also encourages engagement when developing strategic and development plans. NC-504 has partnered with Corporation for Supportive Housing (CSH) consultants who conducted agency and individual feedback sessions/advisory meetings with PWLE as well as published the opportunity for PWLE to apply to obtain reimbursement of up to \$7,000 for their participation over the next several months. Eighteen people applied and two were chosen. Those who were not selected for the initial financial incentive are still being considered for incorporation in different capacities. Several agencies in NC-504 employ their previous participants. These staff members are valued for the lived perspective they bring to operations from both former homeless and survivor lenses. Many agency board members, previous directors and managers are PWLE as required. NC-504 supports PWLE participation in training and professional development to enhance their ability to share their experiences in ways that drive systemic change. NC-504 maintains contracted services with consultants that have PWLE whom contribute subject matter expertise to ensure governing documents and policies/procedures are reflective of inclusion. NC-504 has begun incorporating PWLE and provide opportunities for financial incentives, networking, training, and educational benefits that would not conflict/jeopardize any program or source of income they already have in place. Guilford County, a CoC member organization is also drafting a policy that outlines best practices for County Human Services and other departments around PWLE, including professional development and compensation expectations. NC-504 understands and supports the importance of ensuring PWLE are represented and heard to help improve homeless programming and system-wide improvement. Lastly, NC-504 CA Team consistently distributes NC-504 member agencies’ employment and training opportunities through the NC-504 Newsletter and offers various web-based trainings that cover a plethora of topics and opportunities for PWLE to conduct training as well.

1D-10c.	Routinely Gathering Feedback and Addressing Challenges of Individuals with Lived Experience of Homelessness.	
	NOFO Section V.B.1.q.	

Describe in the field below:

- |    |  |
|----|--|
| 1. | how your CoC gathers feedback from people experiencing homelessness;       |
| 2. | how often your CoC gathers feedback from people experiencing homelessness; |

3.	how your CoC gathers feedback from people who received assistance through the CoC Program or ESG Program;
4.	how often your CoC gathers feedback from people who have received assistance through the CoC Program or ESG Program; and
5.	steps your CoC has taken to address challenges raised by people with lived experience of homelessness.

**(limit 2,500 characters)**

1) NC-504 partners with agencies to solicit/gather feedback and recruit People With Lived Experience (PWLE) via Facebook, newsletter, flyers/postings and personal contact. Agency staff/CoC members routinely collect feedback from persons with lived expertise and share this feedback or asks the person to share directly with the CoC. NC-504 conducts an annual evaluation of the Coordinated Entry (CE) System, and a needs and gaps analysis that includes interviews that incorporate client feedback.

2) NC-504 annually reviews CoC/ESG agencies to ensure their bylaws require a PWLE on the board to bring their experience to impact decision making, budgeting and policy. NC-504 conducts client satisfaction surveys at least once annually to solicit feedback from the clients who access services.

3) CoC and ESG providers have surveys that are program specific and residents in designated programs participate in these surveys. The Family Service of the Piedmont (FSP) for example has a Leadership Team and Performance and Quality Improvement Committee (LTPQIC) which reviews survey results based on service categories and provides appropriate feedback or recommendations to the organization. Data is used to evaluate the quality, effectiveness, efficiency, and accessibility of the organization’s services and operations and to assess the gaps in services. Client feedback that is collected outside of the survey process is also presented to the LTPQIC for review and applicable action and an integral part of quality improvement plans among funded agencies in the CoC.

4) Clients are actively/regularly involved in their own service plans in funded programs. In addition, clients/stakeholders are involved in the strategic planning process of the CoC and the service planning processes continuously throughout the year. CoC and ESG agencies have program specific Resident Councils that meet to provide feedback to staff on what programming they need and suggest changes.

5) NC-504 has a Justice, Equity, Diversity, Inclusion and Belonging/PWLE (JEDI-B) committee that continues to advocate for and ensure that diverse voices are reflected within the NC-504’s governing documents. In response to feedback of the annual CE evaluation, both the HMIS/CE Lead agency and NC-504 have enhanced accessibility by establishing community access points, collaborating with multiple agencies, and hiring additional staff to ensure timely responses to clients and requested resources.

1D-11.	Increasing Affordable Housing Supply.	
	NOFO Section V.B.1.s.	

Describe in the field below at least two steps your CoC has taken in the past 12 months to engage city, county, or state governments that represent your CoC’s geographic area regarding the following:

1.	reforming zoning and land use policies to permit more housing development; and
2.	reducing regulatory barriers to housing development.

**(limit 2,500 characters)**

1) Over the past 12 months, NC-504 worked tirelessly to affect regulatory and programmatic changes throughout the geographic area designed to permit more housing, remove barriers to housing development, zoning reform and land use policies. NC-504 members did this by engaging municipalities and elected officials during Homelessness Task Force and city Planning/Zoning meetings in-person, virtually, and with online surveys. NC-504 has also worked with City of Greensboro staff to advance legislation to create new zoning districts to allow a wide range of missing middle housing by right. It aims to identify standards that encourage compatibility with existing residential development while increasing housing choices (i.e. gentle density). Through partnered engagement, NC-504 plans to increase affordable housing by applying for the CoC Builds grant to increase affordable housing for specialized populations. High Point’s plan now allows residential development in all zoning districts except Heavy Industrial. These plans also create more by right place types through zoning. Rezoning applications no longer go to Council but are approved by the Planning & Zoning Commission. The hope is that this may help combat NIMBYism with resident complaints and help take some “politics” out of those decisions.

2) Both cities (Greensboro, High Point) work with their planning and zoning departments supporting activities of the Historic Properties Commission and providing staff support for Guilford County’s Planning Board and Board of Adjustment. The Planning & Development Department is exploring no parking or fewer parking requirements for residential development in transit-oriented areas. NC-504 continues discussions with High Point elected officials for fair, affordable housing development. CoC wide collaboration resulted in regulatory changes which adjusted Greensboro’s existing land use/zoning regulations, expanding the opportunities for Accessory Dwelling Unit (ADU) development across the city. The new requirements removed minimum lot size, increased maximum square foot allowed to encourage broader range of ADU products, and on-site property ownership requirement allowing tiny homes to be an ADU option to increase affordable housing supply. The changes adjusted required dimensional standards to allow ADUs to be placed on more areas of residential lots. These changes addressed barriers of limited land area within the city and supports new affordable housing development.



## 1E. Project Capacity, Review, and Ranking–Local Competition

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

1E-1.	Web Posting of Advance Public Notice of Your CoC's Local Competition Deadline, Scoring and Rating Criteria.	
	NOFO Section V.B.2.a. and 2.g.	

1.	Enter the date your CoC published its submission deadline and scoring and rating criteria for New Project applicants to submit their project applications for your CoC's local competition.	08/16/2024
2.	Enter the date your CoC published its submission deadline and scoring and rating criteria for Renewal Project applicants to submit their project applications for your CoC's local competition.	08/16/2024

1E-2.	Project Review and Ranking Process Your CoC Used in Its Local Competition. We use the response to this question and the response in Question 1E-2a along with the required attachments from both questions as a factor when determining your CoC's eligibility for bonus funds and for other NOFO criteria below.	
	NOFO Section V.B.2.a., 2.b., 2.c., 2.d., and 2.e.	

You must upload the Local Competition Scoring Tool attachment to the 4B. Attachments Screen.
Select yes or no in the chart below to indicate how your CoC ranked and selected project applications during your local competition:

1.	Established total points available for each project application type.	Yes
2.	At least 33 percent of the total points were based on objective criteria for the project application (e.g., cost effectiveness, timely draws, utilization rate, match, leverage), performance data, type of population served (e.g., DV, youth, Veterans, chronic homelessness), or type of housing proposed (e.g., PSH, RRH).	Yes
3.	At least 20 percent of the total points were based on system performance criteria for the project application (e.g., exits to permanent housing destinations, retention of permanent housing, length of time homeless, returns to homelessness).	Yes
4.	Provided points for projects that addressed specific severe barriers to housing and services.	Yes
5.	Used data from comparable databases to score projects submitted by victim service providers.	Yes

6.	Provided points for projects based on the degree the projects identified any barriers to participation (e.g., lack of outreach) faced by persons of different races and ethnicities, particularly those over-represented in the local homelessness population, and has taken or will take steps to eliminate the identified barriers.	Yes
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1E-2a.	Scored Project Forms for One Project from Your CoC's Local Competition. We use the response to this question and Question 1E-2. along with the required attachments from both questions as a factor when determining your CoC's eligibility for bonus funds and for other NOFO criteria below.  NOFO Section V.B.2.a., 2.b., 2.c., and 2.d.	
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You must upload the Scored Forms for One Project attachment to the 4B. Attachments Screen.  
Complete the chart below to provide details of your CoC's local competition:

1.	What were the maximum number of points available for the renewal project form(s)?	290
2.	How many renewal projects did your CoC submit?	11
3.	What renewal project type did most applicants use?	PH-PSH

1E-2b.	Addressing Severe Barriers in the Local Project Review and Ranking Process.  NOFO Section V.B.2.d.	
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Describe in the field below:

1.	how your CoC analyzed data regarding each project that has successfully housed program participants in permanent housing;
2.	how your CoC analyzed data regarding how long it takes to house people in permanent housing;
3.	how your CoC considered the specific severity of needs and vulnerabilities experienced by program participants preventing rapid placement in permanent housing or the ability to maintain permanent housing when your CoC ranked and selected projects; and
4.	the severe barriers your CoC considered.

(limit 2,500 characters)

1) The CoC analyzed data through reviewing APRs, HDX Competition Report, Comparable Data for the Victim Service Provider, CoC Quarterly Spending Report provided by HUD, Housing First Assessments, and monitoring results for those projects that were renewals. Project Applications, Operations manuals/policies were reviewed to ensure that persons with highest needs and vulnerabilities and most barriers to housing were being served by the project applicant.

2) The System Performance Evaluation (SPE) Committee evaluated the length of time (LOT) between start date in a housing program and move-in date for the same program on an average basis. The number of days from “start” to “move-in” was then scored based on performance established in the scoring tool. Projects with a LOT of 30 days or less were awarded the maximum points. The SPE Committee also looked at access to services, collaboration, unit utilization rate, and retention, terminations and returns to homelessness. Projects that reported 90% or greater exits to a permanent exit situation/destination (or no exits for PSH projects) were awarded maximum points.

3) The SPE Committee considered chronic homelessness, veterans, families and children, youth 18-24, domestic violence survivors, substance abuse, and mental health needs access to healthcare, as well as whether projects were utilizing a housing first approach. The SPE Committee recognized that permanent housing and the options for housing are limited in our community but discussed other opportunities of growth for project applicants and the CoC who wants to work with those agencies about opportunities to increase housing options utilizing funding opportunities within the CoC.

4) Consideration was given by SPE Committee for those project applicants that served clients with higher acuity levels and severe needs for those entering through the Reentry Program, elderly, severe service need populations, and LGBTQ+ youth in our community. On the project submissions, project applicants could specify whether individuals served were chronically homeless, veterans, families and children, youth 18-24, Domestic Violence Survivors, or dealing with substance abuse and/or Mental Illness, or HIV/AIDS.

1E-3.	Advancing Racial Equity through Participation of Over-Represented Populations in the Local Competition Review and Ranking Process.	
NOFO Section V.B.2.e.		
Describe in the field below:		
1.	how your CoC used input from persons of different races and ethnicities, particularly those over-represented in the local homelessness population, to determine the rating factors used to review project applications;	
2.	how your CoC included persons of different races and ethnicities, particularly those over-represented in the local homelessness population in the review, selection, and ranking process; and	
3.	how your CoC rated and ranked projects based on the degree that proposed projects identified any barriers to participation (e.g., lack of outreach) faced by persons of different races and ethnicities, particularly those over-represented in the local homelessness population, and steps the projects took or will take to eliminate the identified barriers.	

(limit 2,500 characters)

1) NC-504 membership is responsible for approving the project scorecard (new and renewal) that is utilized by the System Performance and Evaluation (SPE) Committee. The membership meetings are open to the public and have participation from the Justice Equity Diversity, and Inclusion and Belonging Committee, which includes Person with Lived Experience. Those project applications submitted were then reviewed and ranked by the SPE Committee following the approved scorecard and then presented to the governing board and membership for approval. NC-504 has a broad representation within the membership regarding approval of the scoring document and project applications ensures funding is allocated to the most vulnerable.

2)The SPEC was composed of six members who reviewed and ranked the project applications. Of those, 50% were African Americans, all but one identifying as women. One person of the committee identified as they/them. According to NC-504 Point in Time data, 539 households were homeless. Out of 539 households, 475 identified as Black/African American/African only, totaling to 88%. Of 539 households, 125 identified as White only, totaling 23% of the homeless population in Guilford County. Black/African American/African made up 71.43% of the unsheltered population, whereas 18.8% of the unsheltered population identified as White only, and Indigenous was 1%. Women represented 38.95% of the homeless population. This shows that the member of SPEC reflects the population that is being overrepresented within the community and is making decisions that impact projects that will serve the overrepresented populations.

3) During the ranking and reviewing process, project applications were reviewed for Racial Equity & Inclusion. Information reviewed included: agency inclusion of Black, Indigenous, and People of Color (BIPOC) on Board of Directors, Board subcommittees or advisory/program planning groups; clear methods for receiving input from BIPOC communities; Agency Board and staff have demonstrated efforts to analyze and identify barriers that result in differences in service delivery/outcomes for BIPOC; Agency policies; training/technical assistance to improve service delivery to BIPOC; and NC-504 monitoring of project applicant (if renewal agency).

<b>1E-4.</b>	<b>Reallocation—Reviewing Performance of Existing Projects.</b>	
	NOFO Section V.B.2.f.	
	Describe in the field below:	
1.	your CoC's reallocation process, including how your CoC determined which projects are candidates for reallocation because they are low performing or less needed;	
2.	whether your CoC identified any low performing or less needed projects through the process described in element 1 of this question during your CoC's local competition this year;	
3.	whether your CoC reallocated any low performing or less needed projects during its local competition this year; and	
4.	why your CoC did not reallocate low performing or less needed projects during its local competition this year, if applicable.	

(limit 2,500 characters)

1) The System Performance and Evaluation (SPE) Committee reviewed all applications received to develop the Priority Listing of projects recommended for funding. The Committee carefully considered and discussed any projects that will lose or gain funds through reallocation. The Committee reviewed new and renewal projects based on organizational capacity, project approach and design, cost effectiveness, and population served. Renewal projects were then additionally reviewed based on performance. Recommendations to reallocate funds consider both HUD’s policy priorities, strategic objectives, and the CoC’s needs and priorities. In regard to new and renewal project proposals, the Committee reviewed the performance and spending history of renewal projects to determine the reallocation of funds. NC-504 encouraged voluntary reallocation funding from their existing projects that are not spending the full award, underutilizing beds, underperforming, not in alignment with Housing First principles and practices, and/or with significant, unresolved findings.

2) Utilizing the NC-504 approved scorecards, the SPE Committee reviewed all renewal projects eligible for reallocation on performance and spending. Based on this review, four projects were identified as low performing or less needed during this year’s local competition.

3) During this year’s competition period, NC-504, reduced/reallocated four renewal projects to create two new projects. Utilizing this approach, the SPE Committee maintained the renewal projects with reduced funding, while increasing housing capacity in new projects.

4) NC-504 reallocated projects during this year’s CoC local competition.

1E-4a.	Reallocation Between FY 2019 and FY 2024.	
	NOFO Section V.B.2.f.	

	Did your CoC cumulatively reallocate at least 20 percent of its ARD between FY 2019 and FY 2024?	No
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1E-5.	Projects Rejected/Reduced–Notification Outside of e-snaps.	
	NOFO Section V.B.2.g.	
	You must upload the Notification of Projects Rejected-Reduced attachment to the 4B. Attachments Screen.	

1.	Did your CoC reject any project application(s) submitted for funding during its local competition?	No
2.	Did your CoC reduce funding for any project application(s) submitted for funding during its local competition?	Yes
3.	Did your CoC inform applicants why your CoC rejected or reduced their project application(s) submitted for funding during its local competition?	Yes
4.	If you selected Yes for element 1 or element 2 of this question, enter the date your CoC notified applicants that their project applications were being rejected or reduced, in writing, outside of e-snaps. If you notified applicants on various dates, enter the latest date of any notification. For example, if you notified applicants on 06/26/2024, 06/27/2024, and 06/28/2024, then you must enter 06/28/2024.	09/20/2024

1E-5a.	Projects Accepted–Notification Outside of e-snaps.	
	NOFO Section V.B.2.g.	
	You must upload the Notification of Projects Accepted attachment to the 4B. Attachments Screen.	

	Enter the date your CoC notified project applicants that their project applications were accepted and ranked on the New and Renewal Priority Listings in writing, outside of e-snaps. If you notified applicants on various dates, enter the latest date of any notification. For example, if you notified applicants on 06/26/2024, 06/27/2024, and 06/28/2024, then you must enter 06/28/2024.	10/03/2024
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1E-5b.	Local Competition Selection Results for All Projects.	
	NOFO Section V.B.2.g.	
	You must upload the Local Competition Selection Results attachment to the 4B. Attachments Screen.	

	Does your attachment include: 1. Project Names; 2. Project Scores; 3. Project Status–Accepted, Rejected, Reduced Reallocated, Fully Reallocated; 4. Project Rank; 5. Amount Requested from HUD; and 6. Reallocated Funds +/-.	Yes
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1E-5c.	Web Posting of CoC-Approved Consolidated Application 2 Days Before CoC Program Competition Application Submission Deadline.	
	NOFO Section V.B.2.g. and 24 CFR 578.95.	
	You must upload the Web Posting–CoC-Approved Consolidated Application attachment to the 4B. Attachments Screen.	

	Enter the date your CoC posted the CoC-approved Consolidated Application on the CoC’s website or partner’s website–which included: 1. the CoC Application; and 2. Priority Listings for Reallocation forms and all New, Renewal, and Replacement Project Listings.	10/28/2024
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1E-5d.	Notification to Community Members and Key Stakeholders by Email that the CoC-Approved Consolidated Application is Posted on Website.	
	NOFO Section V.B.2.g.	
	You must upload the Notification of CoC-Approved Consolidated Application attachment to the 4B. Attachments Screen.	

	Enter the date your CoC notified community members and key stakeholders that the CoC-approved Consolidated Application was posted on your CoC’s website or partner’s website.	10/28/2024
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## 2A. Homeless Management Information System (HMIS) Implementation

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

<b>2A-1.</b>	<b>HMIS Vendor.</b>	
	Not Scored—For Information Only	

	Enter the name of the HMIS Vendor your CoC is currently using.	WellSky
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<b>2A-2.</b>	<b>HMIS Implementation Coverage Area.</b>	
	Not Scored—For Information Only	

	Select from dropdown menu your CoC's HMIS coverage area.	Single CoC
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<b>2A-3.</b>	<b>HIC Data Submission in HDX.</b>	
	NOFO Section V.B.3.a.	

	Enter the date your CoC submitted its 2024 HIC data into HDX.	05/10/2024
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<b>2A-4.</b>	<b>Comparable Databases for DV Providers—CoC and HMIS Lead Supporting Data Collection and Data Submission by Victim Service Providers.</b>	
	NOFO Section V.B.3.b.	

	In the field below:	
1.	describe actions your CoC and HMIS Lead have taken to ensure DV housing and service providers in your CoC collect data in HMIS comparable databases; and	
2.	state whether DV housing and service providers in your CoC are using a HUD-compliant comparable database—compliant with the FY 2024 HMIS Data Standards.	

**(limit 2,500 characters)**

1) NC-504 and the HMIS Lead Agency, Partners Ending Homelessness (PEH), actively work with the Domestic Violence Service housing and service provider, Family Service of the Piedmont (FSP) to ensure data collection occurs in a comparable database. FSP utilizes Apricot Social Solution (HMIS) Comparable database to track their data, run reports, understand impact, and manage outcomes. FSP continues to submit all required reports and de-identified aggregated system performance measures (SPM) data for each of their projects to the HMIS Lead throughout the year. FSP continues to provide a de-identified weekly report for Coordinated Assessment Workgroup meetings. This report provides the detail number of clients housed and currently working to house via their various housing funding streams. NC-504 utilizes the available reports, SPM data, and ongoing participation in meetings to continually support FSP and their data collection efforts.

2) Family Service of the Piedmont utilizes a HUD-compliant, HMIS comparable database, Apricot Social Solutions, which is compliant with the FY 2024 HMIS Data Standards.

2A-5.	Bed Coverage Rate—Using HIC, HMIS Data—CoC Merger Bonus Points.	
	NOFO Section V.B.3.c. and V.B.7.	

Using the 2024 HDX Competition Report we issued your CoC, enter data in the chart below by project type:

Project Type	Adjusted Total Year-Round, Current Non-VSP Beds [Column F of HDX Report]	Adjusted Total Year-Round, Current VSP Beds [Column K of HDX Report]	Total Year-Round, Current, HMIS Beds and VSP Beds in an HMIS Comparable Database [Column M of HDX Report]	HMIS and Comparable Database Coverage Rate [Column O of HDX Report]
1. Emergency Shelter (ES) beds	390	31	335	85.90%
2. Safe Haven (SH) beds	6	0	6	100.00%
3. Transitional Housing (TH) beds	61	0	61	100.00%
4. Rapid Re-Housing (RRH) beds	96	0	96	100.00%
5. Permanent Supportive Housing (PSH) beds	2,161	0	352	16.29%
6. Other Permanent Housing (OPH) beds	0	0	0	0.00%

2A-5a.	Partial Credit for Bed Coverage Rates at or Below 84.99 for Any Project Type in Question 2A-5.	
	NOFO Section V.B.3.c.	

For each project type with a bed coverage rate that is at or below 84.99 percent in question 2A-5, describe:

1.	steps your CoC will take over the next 12 months to increase the bed coverage rate to at least 85 percent for that project type; and
2.	how your CoC will implement the steps described to increase bed coverage to at least 85 percent.



**(limit 2,500 characters)**

1) Over the next 12 months, NC-504 will diligently work collaboratively with housing providers and the HMIS Lead to ensure the necessary training, resources, and efforts for improving accurate reporting is addressed to increase accuracy of the bed coverage rate. The bed coverage rate reported in the HIC for 2024 for PSH of 16.29 % is a direct result of VASH beds not being required to be entered into/or exported into HMIS and identifying OPH beds as PSH in the submission. NC-504 has determined that there was a data entry error in the 2024 HIC that showed 1809 beds reported as PSH beds rather than OPH. With correct data entry, the PSH bed coverage rate would be 67% and the balance of the coverage was directly attributed to VASH beds not being entered into HMIS. NC 504 has supported the NC HMIS Implementation Lead, MCAH, in its efforts to work with HUD, the VA, and WellSky on identifying a solution for importing VASH data accurately and seamlessly into NCHMIS. However, importing VASH data is not technically possible at this time.

2) The CoC will continue to engage in conversations with the VA and the Housing Authority to discuss solutions for entering/uploading VASH data. The CoC will address data quality concerns through participation in HUD training and reviewing of data by multiple people prior to submission to correctly identify and classify the bed inventory. The CoC and HMIS Lead will collaborate for the PIT 2025 in bi-weekly planning meetings to inform data collection and methodology to obtain accurate data and support accurate data entry for the 2025 HIC. The CoC will continue to encourage projects to utilize and submit information to the HMIS system and partner with those agencies that have expressed interest in having an HMIS project to help support overall community data improvement.

2A-6.	Longitudinal System Analysis (LSA) Submission in HDX 2.0.	
	NOFO Section V.B.3.d.	
	You must upload your CoC's FY 2024 HDX Competition Report to the 4B. Attachments Screen.	
	Did your CoC submit at least two usable LSA data files to HUD in HDX 2.0 by January 24, 2024, 11:59 p.m. EST?	Yes

## 2B. Continuum of Care (CoC) Point-in-Time (PIT) Count

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

<b>2B-1.</b>	PIT Count Date.	
	NOFO Section V.B.4.a	

	Enter the date your CoC conducted its 2024 PIT count.	01/24/2024
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<b>2B-2.</b>	PIT Count Data–HDX Submission Date.	
	NOFO Section V.B.4.a	

	Enter the date your CoC submitted its 2024 PIT count data in HDX.	05/10/2024
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<b>2B-3.</b>	PIT Count–Effectively Counting Youth in Your CoC’s Most Recent Unsheltered PIT Count.	
	NOFO Section V.B.4.b.	

	Describe in the field below how your CoC:	
1.	engaged unaccompanied youth and youth serving organizations in your CoC’s most recent PIT count planning process;	
2.	worked with unaccompanied youth and youth serving organizations to select locations where homeless youth are most likely to be identified during your CoC’s most recent PIT count planning process; and	
3.	included youth experiencing homelessness as counters during your CoC’s most recent unsheltered PIT count.	

(limit 2,500 characters)

1) NC-504 began the 2024 PIT Planning in the fall of 2023 and created the PIT Youth committee whose members included local university students, various youth serving organizations, Guilford County School McKinney-Vento Liaisons, and HHS Foster Care (18-21 yrs. old) Social Workers during the planning of the count to engage youth and unaccompanied youth. This committee's mission was identifying areas where youth were located/congregate (malls, parks, smoke shops, coffee houses, food courts, etc.), identify best practices for engaging youth in the planning (free food, giveaways) and implementation of the PIT count, as well as identifying what specific supplies (hygiene, food, clothing, backpacks, etc.) homeless youth may need. The PIT survey was converted into a digital application for easier use of PIT counters and to encourage more youth engagement.

2) During the 2024 PIT count planning process, NC-504 crafted a methodology to successfully engage youth serving organizations as well as non-profit agencies including Youth Focus and the Shirley T. Frye YWCA of Greensboro, who provided assistance on the night of the PIT count through engagement with their own unaccompanied youth. The Guilford County Geographical Information System (GIS) in collaboration with the PIT Youth committee developed an app for the PIT count to identify/geo locate hotspots where homeless youth may be located on the night of the count. The committee also developed a flyer which included QR codes for families, unaccompanied youth, and youth 18–24-year-olds who did not want to be identified by name, to contact a local youth provider to identify a place to complete the survey in person and in private.

3) NC-504 attempted to engage youth experiencing homelessness as counters by including them in the planning process for the PIT Count. They did this by collaborative efforts from college and university offices of student support, local food pantries, and youth homelessness agencies. To respect youth self-determination and choice, NC-504 provided many options to participate in the PIT. While many youths participated in various roles on the night of the PIT Count and throughout the seven days, no youth chose to be counters.

2B-4.	PIT Count–Methodology Change–CoC Merger Bonus Points.	
	NOFO Section V.B.5.a and V.B.7.c.	

	In the field below:	
1.	describe any changes your CoC made to your sheltered PIT count implementation, including methodology or data quality changes between 2023 and 2024, if applicable;	
2.	describe any changes your CoC made to your unsheltered PIT count implementation, including methodology or data quality changes between 2023 and 2024, if applicable;	
3.	describe whether your CoC's PIT count was affected by people displaced either from a natural disaster or seeking short-term shelter or housing assistance who recently arrived in your CoCs' geographic; and	
4.	describe how the changes affected your CoC's PIT count results; or	
5.	state "Not Applicable" if there were no changes or if you did not conduct an unsheltered PIT count in 2024.	

(limit 2,500 characters)

- 1) NC-504 made no changes to the sheltered PIT methodology between 2023 and 2024.
- 2) NC-504 made changes to the unsheltered PIT methodology between 2023 and 2024. NC-504 reevaluated the methodology to enhance the process, geographical coverage, and equity within our community to more accurately capture and reflect the unsheltered count. The Guilford County's Geographics Information System (GIS) Department and the CoC Lead collaboratively worked to develop a community-wide app to improve accuracy when collecting data in the field for the unsheltered count. NC-504 enhanced and increased the number of PIT trainings to incorporate the app and increase volunteer participation. Additionally, there was a marked increase in community partners as well as an increase in the group size of surveyors to enhance safety between counts.
- 3) NC-504's PIT count was not affected by people displaced either from a natural disaster or seeking short-term shelter or housing assistance who recently arrived in the CoCs' geographic area.
- 4) The methodology changes to the unsheltered PIT count affected the CoC's over-all count and provided a more accurate census with appropriate demographics throughout our geographical area. These changes resulted in an increase in persons experiencing homelessness in our community. NC-504 will continue to use the digital application to further enhance the 2025 unsheltered methodology and PIT Count implementation.

## 2C. System Performance

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

<b>2C-1.</b>	<b>Reducing the Number of First Time Homeless—Risk Factors Your CoC Uses.</b>	
	NOFO Section V.B.5.b.	
	In the field below:	
1.	describe how your CoC determined the risk factors to identify persons experiencing homelessness for the first time;	
2.	describe your CoC’s strategies to address individuals and families at risk of becoming homeless; and	
3.	provide the name of the organization or position title that is responsible for overseeing your CoC’s strategy to reduce the number of individuals and families experiencing homelessness for the first time	

**(limit 2,500 characters)**

1) The CoC continues to build upon the strategies to prevent first time homelessness in collaboration with the HMIS Lead Agency, Partners Ending Homelessness (PEH), the CoC monitors trends and metrics related to individuals experiencing homelessness for the first time. NC-504 continues to analyze information/data collected from the Point in Time Count, intake/assessments, community surveys, street outreach teams, shelter staff, and law enforcement and crisis response agencies. NC-504 continues to compare this information to the HMIS data of those who have entered the homeless system for the first time to identify risk factors. Factors that have been identified include loss of income and/or employment, victimization, substance use, health related crisis/expenses, criminal justice involvement, cost burdened housing, and institutional discharge.

2) NC-504’s strategy for addressing individuals and families at risk of becoming homeless for the first time continues to include: a) using data to identify risk factors that inform CoC prevention needs, strategies, funding decisions, and programs; b) coordinating efforts of member agencies to provide funds, cash assistance, and supportive services to households at risk; c) increasing Coordinated Entry access, support, and collaboration efforts for discharge planning across systems (e.g., foster care, hospitals, mental health inpatient treatment facilities, jail) so persons leaving systems of care do not enter homelessness; d) referring households to mediation programs and legal assistance programs to preserve tenancy; e) advocating for local affordable housing opportunities to reduce cost burdens for families at risk of homelessness; f) advocating for resources/financial assistance to be uniformly low barrier and accessible; g) maintaining relationships with housing providers and landlords to aid and identify at-risk households; and h) providing educational opportunities and training to case managers across system interventions to assist those at risk of homelessness. The CoC will also continue to track data for each of these initiatives to evaluate best practice, usefulness, and areas for improvement as these strategies have reduced the number of households entering the homelessness system for the first time.

3) The CoC Program Manager/CA; Guilford County Department of Health and Human Services continues to oversee this strategy.

<b>2C-1a.</b>	<b>Impact of Displaced Persons on Number of First Time Homeless.</b>	
	NOFO Section V.B.5.b	

Was your CoC’s Number of First Time Homeless [metric 5.2] affected by the number of persons seeking short-term shelter or housing assistance displaced due to:

1.	natural disasters?	No
2.	having recently arrived in your CoC’s geographic area?	No

<b>2C-2.</b>	<b>Reducing Length of Time Homeless—CoC’s Strategy.</b>	
	NOFO Section V.B.5.c.	

In the field below:

1.	describe your CoC's strategy to reduce the length of time individuals and persons in families remain homeless;
2.	describe how your CoC identifies and houses individuals and persons in families with the longest lengths of time homeless; and
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the length of time individuals and families remain homeless.

**(limit 2,500 characters)**

1) NC-504 is re-evaluating the current strategy to reduce the length of time individuals and families remain homeless. This strategy included multiple approaches-some effective, others in-effective. NC-504 will maintain a multi-access point Coordinated Entry (CE) system throughout the community which is coordinated by the HMIS/CE Lead Agency. This approach was intended to support intentional outreach to engage with persons who may be housing resistant/difficult, and to manage the By-Name List (BNL) effectively. Additional access points include local libraries in both City of Greensboro and the City of High Point, health centers, the local jails. This approach continues to provide the opportunity for people that are experiencing homelessness with the longest length of time homeless/housing resistant to be prioritized on the BNL, receive supportive services and items necessary to meet their basic needs, but connecting persons to a housing opportunity quickly is not possible due to limited resources and housing availability. The HMIS/CE Lead continues to host weekly CE Case Conferencing Calls and to update all providers on clients on the BNL and any changes to housing resources in the CoC. The CE prior system of 'pick-up' has shifted to a more collaborative approach to allow clients to be appropriately assisted quickly as they now are being assigned to agencies with the funding/units and staff capacity to assist them immediately rather than remaining on stagnate waitlists with individual agencies that are unable to expedite the housing process.

2) NC-504 continues to identify and house individuals/families with the longest lengths of time homeless via the use of an assessment tool and HMIS. Clients are then prioritized on the BNL according to this information, directly referred into housing programs that best meet their needs, supported during their housing search process, and connected with services that can assist in combating the barriers that increase the length of time homeless. Where funding and housing is immediately available, this system expedites the housing process exponentially. Additionally, NC-504 has developed a policy to prevent persons experiencing homelessness removal from the BNL if there is inactivity less than 45 calendar days to keep housing resistant persons engaged in the system.

3) The CoC Program Manager/CA; Guilford County Department of Health and Human Services continues to oversee this strategy.

2C-3.	Successful Permanent Housing Placement or Retention –CoC's Strategy.	
	NOFO Section V.B.5.d.	

In the field below:

1.	describe your CoC's strategy to increase the rate that individuals and persons in families residing in emergency shelter, safe havens, transitional housing, and rapid rehousing exit to permanent housing destinations;
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2.	describe your CoC's strategy to increase the rate that individuals and persons in families residing in permanent housing projects retain their permanent housing or exit to permanent housing destinations; and
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to increase the rate that individuals and families exit to or retain permanent housing.

**(limit 2,500 characters)**

1) NC-504 strategy to increase the rate that individuals and persons in families residing in emergency shelter, safe havens, transitional housing, and rapid rehousing exit to permanent housing destinations is multi facet. The CoC will continue to partner housing providers to CoC landlord engagement specialist who are tasked with coordinating with existing and new landlords to increase housing stock. Providers will continue their work with program participants to apply for other income-based housing program including LITHC, HCV, USDA multi-family units, etc. Also, part of this continued strategy, NC-504 will continue to build upon lessons learned around shared living options, explore barriers to exiting to a permanent housing destination/identify solution, reviewed data quality, and provided HMIS support to ensure data entry is accurate. NC-504 will evaluate all funding opportunities available for the Collaborative Applicant/CoC Lead to apply for on behalf of the NC-504 to increase available housing units.

2) NC-504's strategy to increase the rate of individuals and persons in families residing in permanent housing is to support case managers in their relationships with landlords to ensure permanency. CoC partners are engaged during the weekly case conferencing about barriers and growth opportunities for permanent housing. NC-504 will utilize Coordinated Entry (CE) policies including the available transfer policy regarding transfers as appropriate to PH (RRH- PSH, PSH scattered site to PSH single site); and increase collaboration between Center for Housing and Community Studies at UNCG (CHCS) and Legal Aid of NC to prevent/divert eviction. NC-504 will continue to work with community partners and CHCS to develop and maintain an ongoing housing list of landlords that are committed to supporting efforts and identify incentives for housing stability.

3) The CoC Program Manager/CoC Lead; Guilford County Department of Health and Human Services continues to oversee this strategy.

2C-4.	Reducing Returns to Homelessness—CoC's Strategy.	
	NOFO Section V.B.5.e.	

In the field below:

1.	describe your CoC's strategy to identify individuals and families who return to homelessness;
2.	describe your CoC's strategy to reduce the rate that individuals and families return to homelessness; and
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the rate individuals and persons in families return to homelessness.

**(limit 2,500 characters)**



1) NC-504 uses HMIS to identify individuals/families who have returned to homelessness through notations/flags/points of contact with providers when presenting for services in the CoC or re-presenting at a Coordinated Entry (CE) Access Point, or through contact with Street Outreach (SO), PATH Team, the Behavioral Health Response Team and/or Guilford County Solution to the Opioid Problem for emergency/overdose/harm reduction response team. This information is used to update the CoC By-Name List which is reviewed during case conferencing on a weekly basis. Contact information is shared during CE Case Conferencing and SO Collaboration meetings so that CoC agencies can then re-engage with clients who have returned/at risk of returning to homelessness in an effort to intervene with resources, to offer landlord mediation in some situations, to connect the clients to financial support if needed, and/or to provide additional case management support to enable the client to retain housing. Where there are other concerns, such as behavioral health and/or substance use, clients are connected to help identify and address barriers to maintaining housing.

2) The CoC is utilizing several interventions and resources to prevent additional returns to homelessness: connecting housing case managers to the jail diversion program's social workers to assist participants to maintain permanent housing if/while incarcerated; crisis assistance/resources to prevent participants from abandoning their housing unit and returning to homelessness due to financial issues or in-patient substance use treatment care; comprehensive discharge planning/coordination with long term care/rehabilitation/skilled nursing facilities; monitoring case management services for effectiveness to ensure that best practices are utilized to ensure housing stability/retention; ensuring appropriate housing placement at initial enrollment; and, implementation of a CoC wide transfer policy through CE to enable coordination of care when a participant needs to transfer from RRH to PSH (if eligible) to maintain housing. The CoC works with partners and housing providers to utilize marketing, intensive outreach, and highly accessible locations to ensure that all households can request crisis, financial assistance, and/or other resources quickly, conveniently that are being affirmatively offered.

3) The CoC Program Manager/CoC Lead; Guilford County Department of Health and Human Services oversees this strategy.

2C-5.	Increasing Employment Cash Income—CoC's Strategy.	
	NOFO Section V.B.5.f.	
	In the field below:	
1.	describe your CoC's strategy to access employment cash sources;	
2.	describe how your CoC works with mainstream employment organizations to help individuals and families experiencing homelessness increase their employment cash income; and	
3.	provide the organization name or position title that is responsible for overseeing your CoC's strategy to increase income from employment.	

(limit 2,500 characters)

1) NC-504 continues to utilize its effective strategy to increase the percentage of access to employment cash resources. Through Coordinated Entry (CE), when applicable, housing providers will continue to connect participants to agencies such as NC Works (Workforce Development and NextGen), Goodwill Industries, Welfare Liaison Reform Project, and Tiny House Community Development, and Faith-Based partners to provide employment opportunities, job skills, job training, interview skills, and other employment soft skills. NC-504 continues to collaborate with local colleges and universities, such as Guilford Technical Community College (GTCC), University of North Carolina at Greensboro (UNCG) and North Carolina Agricultural and Technical State University (NC A&T) to provide educational opportunities to those being served by housing providers to increase the ability to successfully access the job market.

2) NC-504 continues to work with mainstream employment organizations, community agencies, civic organizations, and faith-based partners to sponsor job fairs to increase access to employment. NC-504 continues to share employment opportunities and job training resources with housing and services providers to assist clients with employment opportunities and provides updates through the CoC newsletter on employment opportunities, employment services, and job fairs. Finally, each CoC homeless provider continues to utilize organizational strategies that are specific and appropriate for the specific sub-population they serve (e.g., Veteran specific employment/education assistance). NC-504 continues to address support for entrepreneurial opportunities, partner with the Minorities and Women Business Enterprise (MWBE) to resource information distribution. NC-504 continues to address how to financially compensate Persons with Lived Experience (PWLE) to add to the improvement of the systems that affect them and add value to their direct input. However, in the collaboration with Corporation of Supportive Housing and the CoC our community have just hired two People with Lived Experience to support our community to be a part of all aspects.

3) The CoC Program Manager/CoC Lead; Guilford County Department of Health and Human Services continues to oversee this strategy.

2C-5a.	Increasing Non-employment Cash Income—CoC's Strategy	
	NOFO Section V.B.5.f.	
	In the field below:	
	1. describe your CoC's strategy to access non-employment cash income; and	
	2. provide the organization name or position title that is responsible for overseeing your CoC's strategy to increase non-employment cash income.	

(limit 2,500 characters)

1) NC-504 strategy to access non-employment cash income has utilized coordination and training opportunities with agencies about new resources and changes of any non-employment cash income requirements/eligibility to ensure access and increased support for stability of project participants. Program staff make referrals or directly assist participants with NC Works applications for unemployment benefits. NC-504 continues to have designated Social Security Administration (SSA) Liaisons to support those that are experiencing homelessness and help agencies to navigate clients through the benefits system. NC-504 continues to have several member agencies who specifically provide participants with assistance navigating the Social Security/Disability process, as well as the application processes for Temporary Assistance to Needy Families (TANF) and Veteran’s Administration benefits. NC-504 continues to have case managers specifically trained and resourced to work with program participants on non-employment cash income needs and to monitor the non-employment cash income gains of participants. The CoC has maintains SOAR (SSI/SSDI Outreach, Access, and Recovery) workers who help ensure enrollment in mainstream benefits including the newly expanded Medicaid benefits. NC-504 resource flyer for the SSA, Department of Health and Human Services (DHHS), Reentry Services, and Veterans Services ensures continuity of care and access to non-cash benefits for individuals and families in a more intentional matter. NC-504 coordinates with additional community partners and CoC agencies to gather additional data that can be used to inform decision making and solidify practices for case managers to increase non employment cash income through direct access and assistance to benefits.

2) The CoC Program Manager/CoC Lead; Guilford County Department of Health and Human Services oversees this strategy.

### 3A. Coordination with Housing and Healthcare

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

<b>3A-1.</b>	<b>New PH-PSH/PH-RRH Project–Leveraging Housing Resources.</b>	
	NOFO Section V.B.6.a.	
	You must upload the Housing Leveraging Commitment attachment to the 4B. Attachments Screen.	

	Is your CoC applying for a new PH-PSH or PH-RRH project that uses housing subsidies or subsidized housing units which are not funded through the CoC or ESG Programs to help individuals and families experiencing homelessness?	Yes
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<b>3A-2.</b>	<b>New PH-PSH/PH-RRH Project–Leveraging Healthcare Resources.</b>	
	NOFO Section V.B.6.b.	
	You must upload the Healthcare Formal Agreements attachment to the 4B. Attachments Screen.	

	Is your CoC applying for a new PH-PSH or PH-RRH project that uses healthcare resources to help individuals and families experiencing homelessness?	Yes
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<b>3A-3.</b>	<b>Leveraging Housing/Healthcare Resources–List of Projects.</b>	
	NOFO Sections V.B.6.a. and V.B.6.b.	

If you selected yes to questions 3A-1. or 3A-2., use the list feature icon to enter information about each project application you intend for HUD to evaluate to determine if they meet the criteria.

Project Name	Project Type	Rank Number	Leverage Type
Interactive Resou...	PH-RRH	15	Healthcare
Fast Track Renewa...	PH-RRH	6	Healthcare

### 3A-3. List of Projects.

1. What is the name of the new project? Interactive Resource Center Rapid Re-Housing 2025
2. Enter the Unique Entity Identifier (UEI): CVGVULHYV239
3. Select the new project type: PH-RRH
4. Enter the rank number of the project on your CoC's Priority Listing: 15
5. Select the type of leverage: Healthcare

### 3A-3. List of Projects.

1. What is the name of the new project? Fast Track Renewal 2024
2. Enter the Unique Entity Identifier (UEI): XPMNLCCD4G69
3. Select the new project type: PH-RRH
4. Enter the rank number of the project on your CoC's Priority Listing: 6
5. Select the type of leverage: Healthcare

### 3B. New Projects With Rehabilitation/New Construction Costs

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

3B-1.	Rehabilitation/New Construction Costs–New Projects.	
	NOFO Section V.B.1.r.	

Is your CoC requesting funding for any new project application requesting \$200,000 or more in funding for housing rehabilitation or new construction?	No
--	----

3B-2.	Rehabilitation/New Construction Costs–New Projects.	
	NOFO Section V.B.1.r.	

If you answered yes to question 3B-1, describe in the field below actions CoC Program-funded project applicants will take to comply with:

1.	Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u); and
2.	HUD’s implementing rules at 24 CFR part 75 to provide employment and training opportunities for low- and very-low-income persons, as well as contracting and other economic opportunities for businesses that provide economic opportunities to low- and very-low-income persons.

**(limit 2,500 characters)**

not applicable

### 3C. Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

3C-1.	Designating SSO/TH/Joint TH and PH-RRH Component Projects to Serve Persons Experiencing Homelessness as Defined by Other Federal Statutes.	
	NOFO Section V.F.	

	Is your CoC requesting to designate one or more of its SSO, TH, or Joint TH and PH-RRH component projects to serve families with children or youth experiencing homelessness as defined by other Federal statutes?	No
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3C-2.	Cost Effectiveness of Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes.	
	NOFO Section V.F.	

You must upload the Project List for Other Federal Statutes attachment to the 4B. Attachments Screen.

If you answered yes to question 3C-1, describe in the field below:

1.	how serving this population is of equal or greater priority, which means that it is equally or more cost effective in meeting the overall goals and objectives of the plan submitted under Section 427(b)(1)(B) of the Act, especially with respect to children and unaccompanied youth than serving the homeless as defined in paragraphs (1), (2), and (4) of the definition of homeless in 24 CFR 578.3; and
2.	how your CoC will meet requirements described in Section 427(b)(1)(F) of the Act.

(limit 2,500 characters)

not applicable

## 4A. DV Bonus Project Applicants for New DV Bonus Funding

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

4A-1.	New DV Bonus Project Applicants.	
	NOFO Section I.B.3.j.	

	Did your CoC submit one or more new project applications for DV Bonus Funding?		Yes
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4A-1a.	DV Bonus Project Types.	
	NOFO Section I.B.3.j.	

Select yes or no in the chart below to indicate the type(s) of new DV Bonus project(s) your CoC included in its FY 2024 Priority Listing.

	Project Type	
1.	SSO Coordinated Entry	No
2.	PH-RRH or Joint TH and PH-RRH Component	Yes

**You must click "Save" after selecting Yes for element 1 SSO Coordinated Entry to view questions 4A-2, 4A-2a. and 4A-2b.**

4A-3.	Data Assessing Need for New DV Bonus Housing Projects in Your CoC's Geographic Area.	
	NOFO Section I.B.3.j.(1)(c) and I.B.3.j.(3)(c)	

1.	Enter the number of survivors that need housing or services:	100
2.	Enter the number of survivors your CoC is currently serving:	75
3.	Unmet Need:	25



4A-3a.	How Your CoC Calculated Local Need for New DV Bonus Housing Projects.	
	NOFO Section I.B.3.j.(1)(c)	
	Describe in the field below:	
	1. how your CoC calculated the number of DV survivors needing housing or services in question 4A-3 element 1 and element 2; and	
	2. the data source (e.g., comparable databases, other administrative data, external data source, HMIS for non-DV projects); or	
	3. if your CoC is unable to meet the needs of all survivors please explain in your response all barriers to meeting those needs.	

**(limit 2,500 characters)**

1) Family Service of the Piedmont (FSP) collected data from their 24/7 Crisis Line of 1,207 calls for requests for immediate safe housing and/or services from persons fleeing/attempting to flee domestic violence, sexual assault, stalking or other life-threatening condition related to violence against the individual or household member in the 2nd quarter ending June 30, 2024. Of those 1,207 calls recorded, 152 victims reported a need for safe housing and services. Of those 152 households, 74 received temporary safe shelter in one of FSP’s two victims’ shelters. FSP worked to place the remaining 78 households temporarily in a hotel until safe shelter was available at FSP or to secure placement at an emergency shelter in another CoC due to FSP’s limited shelter capacity and other shelter in the CoC. NC-504’s victim service and housing providers were serving 74 victims during the same time period reported, leaving 78 households with unmet housing and service needs in NC-504. FSP’s two Victims’ Emergency Shelters served a total of 343 individuals in FY24, showing a significant need for services and housing opportunities in the CoC. NC-504’s Victims’ TH-PH/RRH Project if awarded, would address this significant need and barriers to safe housing inherent in the homeless system for survivors and those experiencing victimization and allow persons with higher levels of need and significant barriers to secure safe housing, provide the choice of a transitional housing component with intensive supportive services if needed, or a temporary stay in TH and secure bridge to RRH, or the choice of 24 months of RRH to ultimately achieve safe, self-sustained permanent housing.

2) The data source for the unmet need was collected from FSP’s HUD compliant and HMIS comparable database, Apricot.

3) Not Applicable.

4A-3b.	Information About Unique Project Applicant Requesting New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)	
	Use the list feature icon to enter information on each unique project applicant applying for New PH-RRH and Joint TH and PH-RRH Component DV Bonus projects—only enter project applicant information once, regardless of how many DV Bonus projects that applicant is applying for.	

<b>Applicant Name</b>
Family Service of...

## Project Applicants Applying for New PH-RRH and Joint TH and PH-RRH DV Bonus Projects

4A-3b.	Information About Unique Project Applicant Requesting New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)	

Enter information in the chart below on the project applicant that applied for one or more New DV Bonus housing projects included on your CoC's FY 2024 Priority Listing for New Projects:

1.	Applicant Name	Family Service of the Piedmont, Inc
2.	Rate of Housing Placement of DV Survivors–Percentage	100%
3.	Rate of Housing Retention of DV Survivors–Percentage	100%

4A-3b.1.	Applicant's Housing Placement and Retention Data Explanation.	
	NOFO Section I.B.3.j.(1)(d)	

For the rate of housing placement and rate of housing retention of DV survivors reported in question 4B-3b., describe in the field below:

1.	how the project applicant calculated the rate of housing placement;
2.	whether the rate for housing placement accounts for exits to safe housing destinations;
3.	how the project applicant calculated the rate of housing retention; and
4.	the data source (e.g., comparable databases, other administrative data, external data source, HMIS for non-DV projects).

**(limit 1,500 characters)**

1) The rate of placement and retention of 100% reported in 4A-3b represents households engaging in Family Service of the Piedmont's (FSP) Victim Rapid Re-Housing (RRH) Program documented in the FSP RRH Annual Performance Report with data collected in the HMIS comparable database, Apricot.

2) No clients who participated in FSP's RRH program dropped out/exited the program or lost housing/terminated during the reporting period which accounts for 100% placement and retention rate noted in the chart.

3) FSP calculated the rate of housing retention based upon the fact that all survivors served/enrolled in the FSP Rapid Re-Housing Program were still housed and engaged in services during the performance period with no exits reported. Of note however, two of the households served in the RRH project have been able to step down their level of financial assistance while engaging supportive services and still retain/maintain housing.

4) Rates reported in 4A-3b were calculated via Apricot, Family Service of the Piedmont's HMIS comparable database.

4A-3c.	Applicant's Experience Housing DV Survivors.	
	NOFO Section I.B.3.j.(1)(d)	
	Describe in the field below how the project applicant:	
1.	ensured DV survivors experiencing homelessness were quickly moved into safe affordable housing;	
2.	prioritized survivors—you must address the process the project applicant used, e.g., Coordinated Entry, prioritization list, CoC's emergency transfer plan;	
3.	determined survivors' supportive services needs;	
4.	connected survivors to supportive services; and	
5.	moved survivors from assisted housing to housing they could sustain—address housing stability after the housing subsidy ends.	

**(limit 2,500 characters)**

- 1) Family Service of the Piedmont (FSP) works to ensure that DV survivors experiencing homelessness are assisted in a trauma-informed manner that quickly moves them into safe, sustainable, affordable housing. FSP is the Victim Services provider in NC-504. Safe, sustainable housing is the goal for all survivors. For survivors, safety is the first priority and housing are addressed once a reasonable level of safety is achieved.
- 2) FSP participates on NC-504's Coordinated Entry Team workgroup meetings which meets weekly to staff cases. SPDAT and lethality assessments for survivors are presented anonymously and scoring accounts for their status as a survivor. The dynamics of DV pose unique challenges to securing housing and necessitate different strategies when working with survivors.
- 3) Case management works to address the barriers to housing many survivors face, including landlord hesitancy to lease to DV victims, survivor choice and safety concerns, economic barriers, hesitancy to engage in services and confidentiality issues. Weekly case management addresses the survivor's needs in a trauma-informed manner and housing choice is survivor driven.
- 4) All survivors served by FSP are given a Strengths and Needs Assessment when presenting for services. This is completed by the client and identifies any needs they or other household members may have. Categories include social support systems, housing/clothing/food, transportation, childcare, employment, education/trade skills, income management, and behavioral health or primary care needs. If a client enters one of our emergency shelters, case management staff will use the needs assessment to work with the client to develop their service plan. Supportive services include budget counseling/credit repair/financial capability building, behavioral health and primary care services, connection with legal assistance, job training or education assistance, transportation, and assistance with childcare. FSP's Consumer Credit Counseling (CCCS) can provide Housing and Credit Counseling services by HUD-certified housing counselors.
- 5) Case management staff work with clients both in shelter and as part of the RRH program to develop a housing sustainability plan. To assist with this plan, clients can benefit from assistance from FSP's CCCS services that provide credit and budget counseling, financial capability and literacy skill building services. These supports work to ensure housing stability after assistance ends.

4A-3d.	Applicant's Experience in Ensuring DV Survivors' Safety.	
	NOFO Section I.B.3.j.(1)(d)	
	Describe in the field below examples of how the project applicant ensured the safety and confidentiality of DV survivors experiencing homelessness by:	
	1. taking steps to ensure privacy/confidentiality during the intake and interview process to minimize potential coercion of survivors;	
	2. making determinations and placements into safe housing;	
	3. keeping survivors' information and locations confidential;	
	4. training staff on safety and confidentiality policies and practices; and	
	5. taking security measures for units (congregate or scattered site), that support survivors' physical safety and location confidentiality.	

**(limit 2,500 characters)**

- 1) Family Service of the Piedmont (FSP) ensures all access sites, communication, and records are confidential and intakes are conducted in a private/secure location at all times. Staff are only authorized to discuss a survivor's specific circumstances when the participant signs a specific, time limited release of information. FSP Case Management staff receive specialized training to ensure services are trauma-informed, predicated on an empowerment model of service delivery to mitigate coercion, and delivered in a manner that is specific to serving survivors.
- 2) FSP is apart of the NC-504 Coordinated Entry system and takes referrals from the By-Name list based on the CoC's prioritization. When determining what housing location is safe for participants, a primary goal in FSP's existing RRH Program, is to achieve and maintain safety, including from the abuser, so unit locations are kept confidential.
- 3) Safety planning/contingency planning is a necessary part of assisting participants to move forward to stability in housing. Access to records is restricted and may only be released by court order or with the survivor's express written consent that is time limited and information specific. Participants may use the Address Confidentiality Program (ACP) to keep abusers from discovering their new address. ACP provides a substitute address to register to vote, receive mail, get a driver's license, or sign up for utilities.
- 4) FSP staff receive a minimum of 20 hours of Victim Services (DV/SSA & Human Trafficking) training upon hire and annually thereafter. Training specifically focuses on effective safety planning for different types of victimization and the stages of recovery from victimization and is provided through The Office for Victims of Crime Training & Technical Assistance Center.
- 5) Safety of survivors is paramount, whether participants are residing in Emergency Shelter or participating in the RRH program. FSP's facilities are equipped with security cameras, alarms, and staffed 24/7. FSP's Facilities Manager works to ensure all aspects of the facilities are in good, working order, and inspections are conducted on a quarterly basis. The Facilities Manager also conducts HQS inspections for all Rapid Re-Housing units before a survivor moves in, assesses for safety, and recommends any needed improvements like safety bars, additional deadbolts, and lighting. FSP staff work with the landlord to ensure that the unit meets the safety needs of the survivor.

4A-3d.1.	Applicant's Experience in Evaluating Its Ability to Ensure DV Survivors' Safety.	
	NOFO Section I.B.3.j.(1)(d)	

Describe in the field below how the project evaluated its ability to ensure the safety of DV survivors the project served in the project, including any areas identified for improvement throughout the project's operation.

**(limit 2,500 characters)**

Family Services of the Piedmont (FSP) operates the only two fully accredited Victims' Service Provider shelters in NC-504 and a CoC RRH housing program. The shelters have been in operation for more than 50 years and provide a safe, violence-free haven for survivors and their children. Safety and security measures are constantly evaluated from experts and the survivor's perspective and best practices/new technology is utilized to ensure site and survivor safety. For FSP's RRH Program, exit to safe, sustainable housing is the goal for all survivors who often have unique barriers or specific housing needs. FSP is accredited for DV and SA services by the Council on Accreditation and the NC Council for Women & Youth Involvement, which conducts on-site monitoring annually. Monthly outcomes also inform self-evaluation regarding safety and are a part of the Agency's Continuous Quality Improvement process which is reviewed and updated annually. FSP staff also evaluate their ability to ensure survivor safety in weekly supervision meetings and monthly divisional staff meetings. FSP's Case Managers work together with survivors to identify what types of environments feels safe, secure housing, emphasizing client choice, safety, and sustainability. The location of the unsafe person/abuser (jail, moved out of the area, not in contact with survivor anymore) are all considerations in regard to the existing safety plan and are accounted for in regular updates to the plan. These considerations can vary based on each individual's needs and circumstances, but consideration is given to whether the unsafe person frequents a given neighborhood/area, proximity of neighbors, building design, transportation and/or parking considerations, and school options for children are often all factors. Using this information, a housing and safety assessment is created for each survivor and staff then begin looking for scattered site units that fit the individual's safety needs. Staff also work with victims regarding the Address Confidentiality Program (ACP) once a lease is signed, to keep abusers from discovering their new address. ACP provides a substitute address to register to vote, receive mail, get a driver's license, or sign up for utilities. All clients served undergo lethality assessments which are updated as the client's situation changes and ongoing safety planning is always based upon what's next – whether the client is entering shelter, leaving shelter, or exiting to housing.

4A-3e.	Applicant's Experience in Placing and Stabilizing Survivors in Permanent Housing Using Trauma-Informed, Survivor-Centered Approaches.	
	NOFO Section I.B.3.j.(1)(d)	

Describe in the field below the project applicant's experience in:

- |    |  |
|----|--|
| 1. | prioritizing placement and stabilization of survivors; |
| 2. | placing survivors in permanent housing;                |

3.	placing and stabilizing survivors consistent with their preferences; and
4.	placing and stabilizing survivors consistent with their stated needs.

**(limit 2,500 characters)**

1) Family Service of the Piedmont (FSP) focuses on prioritizing placement of survivors to safe, sustainable housing and stabilizing households to maintain housing. FSP's experienced staff work with survivors to locate and secure housing, emphasizing client choice, safety, and sustainability. Housing assessments are completed to ascertain individual preferences, what makes them feel safe, and to identify any potential barriers to success. A full SPDAT is completed for those who are interested in CoC housing programs and submitted to the Coordinated Entry (CE) System. The Coordinated Assessment Committee (composed of representatives of the CoC's programs) uses SPDAT scores/measures of acuity to make the ultimate decision on who is prioritized for housing support. Safety, self-determination, and healing from trauma are the driving factors, rather than the shortest possible timeline to permanent housing.

2) Survivors engage the housing process once they have indicated they feel safe. FSP staff explain the housing program opportunities to participants who meet eligibility requirements for voucher assistance (FUP, HCV, NED, e.g.), CoC PSH, or RRH programs. If the survivor indicates a desire to remain in the area, they have the opportunity to drive the process, ask questions and explore what housing opportunities are available. FSP staff also try to assist survivors to remain in their current home if desired; through 50b protective orders against their unsafe person, assisting with transportation costs to safe havens with family/friends, relocation services, short term emergency financial assistance and/or achieving permanent housing through non-HUD funded programs.

3) In keeping with a survivor's stated preferences, survivors are presented with an array of housing options. Every avenue is explored to ensure a survivor's preferences, are honored and location, unit selection, amenities (park, house vs. apartment, etc.) are available if housing program placement is chosen.

4) Once referred into RRH program at FSP by CE, staff inform client's of rights, responsibilities, and illicit stated needs, and outlines how much financial assistance is provide and the period of assistance. The agreements are tailored to the client's specific situation taking into account safety, income, child-care needs, continuing education, etc., and are consistent with the NC-504s Written Standards. The agreement is updated every 3 months to reflect the survivor's stated needs.

4A-3f.	Applicant's Experience in Trauma-Informed, Survivor-Centered Approaches.	
	NOFO Section I.B.3.j.(1)(d)	

Describe in the field below examples of the project applicant's experience using trauma-informed, victim-centered approaches to meet needs of DV survivors by:

1.	establishing and maintaining an environment of agency and mutual respect, e.g., the project does not use punitive interventions, ensures survivors and staff interactions are based on equality, and minimize power differentials;
2.	providing survivors access to information on trauma, e.g., training staff on providing survivors with information on the effects of trauma;
3.	emphasizing survivors' strengths, e.g., strength-based coaching, questionnaires and assessment tools include strength-based measures, case plans worked towards survivor-defined goals and aspirations;
4.	centering on cultural responsiveness and inclusivity, e.g., training on equal access, cultural competence, nondiscrimination, language access, improving services to be culturally responsive, accessible, and trauma-informed;

	5. providing a variety of opportunities for survivors' connections, e.g., groups, mentorships, peer-to-peer, spiritual needs; and
	6. offering support for survivor parenting, e.g., trauma-informed parenting classes, childcare, connections to legal services.

(limit 5,000 characters)



- 1) Family Services of the Piedmont (FSP) uses a trauma-informed victim centered approach that creates an environment of equity and limits power differentials with program participants during all interactions. FSP's staff are trained to collaborate with clients to secure housing, emphasizing client choice, safety, and sustainability and FSP does not use punitive interventions. FSP's trauma-informed approach to services ensures that survivors have access to services in an environment that is inclusive, de-stigmatizing, and does not re-traumatize the survivor.
- 2) FSP provides survivors access to information related to identifying and addressing the effects of trauma and offers both psycho-educational and clinical support groups and all survivors served have access to trauma-focused mental health and substance abuse services. FSP Staff receive a minimum of twenty hours of DV, Sexual Assault, Stalking & Human Trafficking training upon hire and annually thereafter on trauma-informed care from FSP's medical director and clinical staff. Training specifically focuses on the stages of recovery from victimization and is provided through The Office for Victims of Crime Training & Technical Assistance Center.
- 3) The modalities used by the program stem from a strengths-based perspective where service solutions are geared toward a client's strengths. Services are provided in a manner that respects the dignity and worth of each individual and promotes self-determination. Punitive interventions are never utilized. Participants are offered the resources and education needed to get to a place where they can determine goals that align with their own aspirations, and then staff work with them on the steps needed to achieve those goals, i.e. permanent housing, employment, childcare, etc. Individualized case plans are created alongside the client to ensure client's have control of their own unique situation. Clients are informed of their rights at intake and FSP fosters and supports an environment of self-determination for participants in the FSP programs.
- 4) FSP endeavors to ensure that both Staff and Board members represent the racially and ethnically diverse population that is served in the CoC. Equity is addressed through FSP's annual diversity training, during monthly divisional meetings, and through weekly staff supervision. FSP's commitment to operating and providing services in a culturally competent and racially equitable manner can be seen in the organizational culture and in the diversity of staff and leadership. FSP will not deny service to anyone based on individual and role differences including those related to race/ethnicity, creed, national origin, language, gender, age, sexual orientation, physical and/or cognitive ability, social class, economic status, education, marital status, religious affiliation, and residency or immigration status. FSP also has a well-defined Language Access Plan and interpreter services.
- 5) FSP services encourage participants to build social supports and community which can be critical to a participant's success. Effective social connections can look different depending on the individual. FSP offers support groups – both psycho-social for a facilitated peer support setting and clinical groups to address specific instances of trauma. Case managers always incorporate spiritual and familial needs and connections into the housing assessment. Case managers work to help the participant re-establish past bonds if safe, such as reconnecting with family if estranged. Support services offer group settings that can facilitate social connections such as financial education groups, continuing education classes, parenting classes, and wellness classes through Integrated Primary Care Services. Isolation is a component of victimization, resulting in most survivors losing their community ties. FSP staff assist them with connecting to a community that fits their needs to support personal growth and integration of community supports.

6) FSP offers a variety of services to support the survivor and their children. FSP's Family Support Services Division provides evidence-based programs such as Healthy Start, Child First and Triple P parenting classes. FSP also provides evidence-based child mental health/medication management services. All these services are available to survivors free of charge. FSP partners with Legal Aid, Elon Law, and the Children's Law Center of NC as part of our role as the Victim Services Provider at the Guilford County Family Justice Center. FSP also operates two accredited Children's Advocacy Centers. Additional supportive services that are available include: budget counseling/credit repair/financial capability building, the provision of behavioral health and primary care, job training, education assistance, transportation, and assistance with childcare if necessary. Additional Victim Services that are available include protective orders, court advocacy and support groups.

4A-3g.	Applicant's Experience Meeting Service Needs of DV Survivors.	
	NOFO Section I.B.3.j.(1)(d)	

Describe in the field below examples of supportive services the project provided to domestic violence survivors while quickly moving them into permanent housing and addressing their safety needs.

(limit 5,000 characters)

Family Services of the Piedmont (FSP), a victim service provider in NC-504 who provides an array of supportive services (noted below) to domestic violence survivors while quickly moving them into permanent housing and addressing their safety needs. These services are provided with the lens that every person that experiences a crime or tragedy does so in a unique way and each individual needs a victim centered, safe, secure, inclusive, supportive and non-judgmental environment to share these experiences. Safety planning and information is provided for any person receiving victim services, which includes family members and friends. Safety planning is one of the most effective tools to help reduce the risk of injury or death and confidentiality is the highest priority.

A) FSP works with Legal Aid and Elon Law for legal services and the Children's Law Center of NC for issues regarding Child Custody through the collaborate efforts offered at the Guilford County Family Justice Center. Partnerships with the Women's Resource Center and the Woodruff Family Law which provide pro-bono services to address legal barriers. Transportation is provided to survivors if needed.

B) FSP offers Consumer Credit Counseling Services (CCCS) to domestic violence survivors. Financial Education workshops are offered with staff developed curriculum tailored to address the unique economic realities of the survivors that we serve. Topics include prioritizing and managing debt, budgeting, credit review and repair, lack of savings, banking basics, predatory lenders, and how to keep sensitive information safe from abusers, and other financial hardships—often directly due to economic abuse they have experienced. Clients also have access to ongoing individual financial coaching with a Consumer Credit Counselor. These individual sessions can assist survivors with developing sustainability plans to ensure sustainable housing in the future. CCCS also offers First Time Homebuyer education classes and assistance with qualifying for low-cost first-time homebuyer loans through the USDA.

C) FSP Case Management staff provide housing search and placement services. Staff are trained in navigating the rental landscape in Guilford County and have established relationships with landlords in our community. FSP partners with the Greensboro Housing Coalition and Greensboro and High Point Housing Authorities to access affordable housing units and available subsidy programs.

D) Domestic Violence Crisis Services are provided by FSP which include a 24/7 Crisis Line, crisis planning, safety planning, assistance with protection orders, court advocacy, medical accompaniment, emergency shelter and support groups.

E) FSP Case Management staff work with domestic violence survivors to develop long-term housing safety plans in preparation for exiting the program. Case Managers will work with the survivor to identify long-term or ongoing needs and develop a plan to address those needs moving forward. Domestic violence survivors exiting the program are assured that they can reach back out for support if needed at any time and many supportive services offered through the program will continue long-term.

F) FSP refers to community partners to meet domestic violence survivors' education, job training, and employment needs. FSP works closely with Guilford Works, Goodwill, Welfare Reform Liaison Project, Guilford Technical Community College, Quick Jobs Access and the Salvation Army.

G) FSP aims to provide holistic services to all clients served. Physical and Mental Healthcare, along with Drug and Alcohol Treatment, are addressed through FSP's Counseling Services Division and are provided at no cost to the survivor. Behavioral Health Services are available for both children and adults.

4A-3h.	Applicant's Plan for Placing and Stabilizing Survivors in Permanent Housing Using Trauma-Informed, Survivor-Centered Approaches in the New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)(e)	
	Describe in the field below how the project(s) will:	
1.	prioritize placement and stabilization of program participants;	
2.	place program participants in permanent housing;	
3.	place and stabilize program participants consistent with their preferences; and	
4.	place and stabilize program participants consistent with their stated needs.	

(limit 2,500 characters)

- 1) Family Service of the Piedmont (FSP) will focus on prioritizing placement of survivors to safe, permanent housing and stabilizing households to maintain housing in the TH/PH-RRH program. FSP's experienced staff will work with survivors to locate and secure permanent housing, emphasizing client choice, safety, and sustainability, regardless of when the survivor chooses the RRH component within the 24-month assistance period. Housing assessments will be completed to ascertain individual preferences, what makes them feel safe, and to identify any potential barriers to permanent housing placement and success. The TH/PH-RRH program will follow the NC-504 Coordinated Entry prioritization for placement based on acuity and lethality. Safety, self-determination, and healing from trauma will be the driving factors of the program, rather than the shortest possible timeline to permanent housing.
- 2) Survivors will have the option to engage the RRH component whether at initial enrollment and/or after choosing the TH component at enrollment. FSP staff will explain other housing opportunities to survivors who meet eligibility requirements for voucher assistance (FUP, HCV, NED, e.g.), CoC PSH, or the RRH program. If the survivor indicates a desire to enroll in TH and/or RRH, they will have the opportunity to drive the process, ask questions and explore housing opportunities through both HUD and non-HUD funded programs if financial assistance is needed or if exiting to friends/family/independent housing without ongoing assistance is the goal.
- 3) In keeping with a survivor's stated preferences, household's will be presented with an array of housing options- whether that is enrollment in TH for short/medium term, RRH for short/medium term, or a combination of components for up to 24-months. Exit plans to permanent housing will be determined based on preferences, immediate needs and long-term goals. Every avenue will be explored to ensure a survivor's preferences for program component and the duration are honored.
- 4) Once staff receives the referral from CE, an initial intake will be conducted and staff will inform the survivor of their component options (TH, RRH, or both) the term for the period of assistance regardless of component type chosen, how much financial assistance may be provide, and the survivor will detail their immediate and long-term needs. If TH chosen, staff would review occupancy agreements or for RRH, begin housing search tailored to stated needs.

4A-3i.	Applicant's Plan for Administering Trauma-Informed, Survivor-Centered Practices in the New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)(e)	

Describe in the field below examples of how the new project(s) will:	
1.	establish and maintain an environment of agency and mutual respect, e.g., the project does not use punitive interventions, ensures program participant and staff interactions are based on equality, and minimize power differentials;
2.	provide program participants access to information on trauma, e.g., training staff on providing program participants with information on the effects of trauma;
3.	emphasize program participants' strengths—for example, strength-based coaching, questionnaires and assessment tools include strength-based measures, case plans work towards survivor-defined goals and aspirations;
4.	center on cultural responsiveness and inclusivity, e.g., training on equal access, cultural competence, nondiscrimination, language access, improving services to be culturally responsive, accessible, and trauma-informed;
5.	provide a variety of opportunities for program participants' connections, e.g., groups, mentorships, peer-to-peer, spiritual needs; and
6.	offer support for survivor parenting, e.g., trauma-informed parenting classes, childcare, connections to legal services.

(limit 5,000 characters)

1) Family Service of the Piedmont's (FSP) Victims' TH-PH/RRH Project will incorporate existing, effective program strategies and procedures as the starting point for implementing this new project. FSP staff will work with participants to chose component type, emphasizing client choice, safety, and sustainability. All services will be client centered, focusing on client rights and responsibilities and the survivor's strengths and needs. Housing assessments will be completed to determine individual preferences, what makes them feel safe, and any potential barriers to success will be identified. Individualized case plans will be created in concert with the survivor as a product of these assessments. Survivor's express safety needs, self-determination, and healing from trauma will be the driving factors, limiting power differentials. All services will be voluntary, and punitive measures will not be tolerated by FSP as this will be antithetical to use of a trauma-informed approach to services that ensures a survivor's environment is inclusive, de-stigmatizing, and does not re-traumatize the survivor.

2) FSP will provide survivors access to information related to identifying and addressing the effects of trauma and will offer both psycho-educational and clinical support groups to all survivors served to support access to trauma-focused mental health and substance use services. FSP staff will receive a minimum of twenty hours of DV, Sexual Assault, Stalking & Human Trafficking training upon hire and annually thereafter on trauma-informed care from FSP's medical director and clinical staff. Training specifically focuses on the stages of recovery from victimization and is provided through The Office for Victims of Crime Training & Technical Assistance Center.

3) The modalities used by the program will stem from a strengths-based perspective, where service solutions are geared toward a client's strengths and aspirations. Services will be provided in a manner that respects the dignity and worth of each individual and promotes self-determination. Participants will be offered the resources and education needed to get to a place where they can work toward their own goals (permanent housing, employment, mental health, childcare, etc.) and voluntary supportive services will assist them in this endeavor.

4) Project staff will represent the racially and ethnically diverse population that is served in the project and operations will incorporate survivor input. FSP conducts annual diversity training for all staff and will continue to address equity and barriers during monthly divisional meetings and weekly staff supervision for this program. FSP will not deny service to anyone based on individual and role differences including those related to race/ethnicity, creed, national origin, language, gender identity, age, sexual orientation, physical and/or cognitive ability, social class, economic status, education, marital status, religious affiliation, and residency or immigration status. FSP will utilize its well-defined Language Access Plan.

5) Services will encourage participants to build social supports and community, which can be critical to a participant's success. Effective social connections may look different depending on the individual. Support groups – both psycho-social for a facilitated peer support setting and clinical groups to address specific instances of trauma will be offered. When searching for housing, case managers will incorporate spiritual/familial needs and connections into the assessment and will assist participants in re-establishing past bonds where they can, such as reconnecting with family/friends. Other support services will offer group settings that can facilitate connection such as CCCS financial education

groups, continuing education classes, parenting classes and wellness classes through Integrated Primary Care Services. Isolation is a large component of DV resulting in most survivors losing their community. FSP staff will assist them with connecting to a community that fits their personal needs.

6) A variety of services will be offered to support the survivor and their children. FSP will provide evidence-based programs such as Healthy Start, Child First and Triple P parenting classes, child mental health and medication management services. Referrals for legal services will be made to partners Legal Aid, Elon Law and the Children’s Law Center of NC as part of FSP’s role as the Victim Services provider at the Guilford County Family Justice Center. Additional supportive services will be available and include but are not limited to: budget counseling/credit repair/financial capability building, behavioral health and primary care services, job training, education assistance, transportation and assistance with childcare if necessary. Additional Victim Services that are available include Protection Orders, Court Advocacy and Support Groups.

4A-3j.	Applicant’s Plan for Involving Survivors in Policy and Program Development, Operations, and Evaluation in the New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)(f)	
	Describe in the field below how the new project will involve survivors:	
1.	with a range of lived expertise; and	
2.	in policy and program development throughout the project’s operation.	

(limit 2,500 characters)

1) Family Services of the Piedmont (FSP) Victims' Joint Transitional Housing-Permanent Housing/Rapid Rehousing (Joint TH/PH-RRH) project will incorporate survivor input in all aspects of project development and implementation regarding ongoing operations and evaluation. FSP has Board membership with lived experience as well as several staff members with a broad range of lived experience. This invaluable expertise and the experiences of survivors involved in FSP programs is utilized to inform design, implementation, and operation of FSP programs and service delivery. Participant feedback is collected through case management, client satisfaction surveys, exit interviews, and by the leadership in the analysis of program outcomes and the FSP quality improvement plan.

2) FSP staff and survivors will heavily inform program development, service choice/connection, and implementation. Client satisfaction surveys are conducted semi-annually in FSP programs to allow survivors to advocate for changes and inform FSP policy and programming. FSP will work with current Rapid Rehousing (RRH) program participants to target the surveys on aspects of housing placement/support and what worked well and what could be improved upon, based upon their recent experience. This practice will continue in the new TH/PH-RRH project if awarded. FSP also plans to assemble an advisory group of former and current program participants to inform throughout the. FSP will have regular work groups to review implementation plans as well as policies and procedures. For ongoing operations and evaluation, input will be sought in several ways. Once the program has been implemented, FSP will form an "Action Committee" of program participants who want to participate. The committee will meet every 1-2 months to discuss what is working and what can be improved upon. We will also conduct client satisfaction surveys specific to the project twice during the year to inform evaluation of the program design and operations. FSP has a strong culture of continuous quality improvement and will employ the skills we have developed as an agency in this area to this new project.



## 4B. Attachments Screen For All Application Questions

We have provided the following guidance to help you successfully upload attachments and get maximum points:

1. You must include a Document Description for each attachment you upload; if you do not, the Submission Summary screen will display a red X indicating the submission is incomplete.
2. You must upload an attachment for each document listed where 'Required?' is 'Yes'.
3. We prefer that you use PDF files, though other file types are supported—please only use zip files if necessary. Converting electronic files to PDF, rather than printing documents and scanning them, often produces higher quality images. Many systems allow you to create PDF files as a Print option. If you are unfamiliar with this process, you should consult your IT Support or search for information on Google or YouTube.
4. Attachments must match the questions they are associated with.
5. Only upload documents responsive to the questions posed—including other material slows down the review process, which ultimately slows down the funding process.
6. If you cannot read the attachment, it is likely we cannot read it either.
  - . We must be able to read the date and time on attachments requiring system-generated dates and times, (e.g., a screenshot displaying the time and date of the public posting using your desktop calendar; screenshot of a webpage that indicates date and time).
  - . We must be able to read everything you want us to consider in any attachment.
7. After you upload each attachment, use the Download feature to access and check the attachment to ensure it matches the required Document Type and to ensure it contains all pages you intend to include.
8. Only use the "Other" attachment option to meet an attachment requirement that is not otherwise listed in these detailed instructions.

Document Type	Required?	Document Description	Date Attached
1C-7. PHA Homeless Preference	No	1C-7. PHA Homeles...	10/28/2024
1C-7. PHA Moving On Preference	No		
1D-10a. Lived Experience Support Letter	Yes	1D-10a. Lived Exp...	10/25/2024
1D-2a. Housing First Evaluation	Yes	1D-2a. Housing Fi...	10/23/2024
1E-2. Local Competition Scoring Tool	Yes	1E-2. Local Compe...	10/23/2024
1E-2a. Scored Forms for One Project	Yes	1E-2a. Scored For...	10/23/2024
1E-5. Notification of Projects Rejected-Reduced	Yes	1E-5. Notificatio...	10/28/2024
1E-5a. Notification of Projects Accepted	Yes	1E-5a. Notificati...	10/23/2024
1E-5b. Local Competition Selection Results	Yes	1E-5b. Local Comp...	10/28/2024
1E-5c. Web Posting—CoC-Approved Consolidated Application	Yes	1E-5c. Web Postin...	10/29/2024
1E-5d. Notification of CoC-Approved Consolidated Application	Yes	1E-5d. Notificati...	10/29/2024

2A-6. HUD's Homeless Data Exchange (HDX) Competition Report	Yes	2A-6. HUD's Homel...	10/23/2024
3A-1a. Housing Leveraging Commitments	No		
3A-2a. Healthcare Formal Agreements	No	3A-2a. Healthcare...	10/28/2024
3C-2. Project List for Other Federal Statutes	No		
Other	No	Local Competition...	10/25/2024

## **Attachment Details**

**Document Description:** 1C-7. PHA Homeless Preference

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:** 1D-10a. Lived Experience Support Letter

## **Attachment Details**

**Document Description:** 1D-2a. Housing First Evaluation

## **Attachment Details**

**Document Description:** 1E-2. Local Competition Scoring Tool

## **Attachment Details**

**Document Description:** 1E-2a. Scored Forms for One Project

## **Attachment Details**

**Document Description:** 1E-5. Notification of Projects Rejected-Reduced

## **Attachment Details**

**Document Description:** 1E-5a. Notification of Projects Accepted

## **Attachment Details**

**Document Description:** 1E-5b. Local Competition Selection Results

## **Attachment Details**

**Document Description:** 1E-5c. Web Posting–CoC-Approved Consolidated Application

## **Attachment Details**

**Document Description:** 1E-5d. Notification of CoC-Approved Consolidated Application

## **Attachment Details**

**Document Description:** 2A-6. HUD's Homeless Data Exchange (HDX) Competition Report

## **Attachment Details**

**Document Description:** 3A-1a. Housing Leveraging Commitments

## **Attachment Details**

**Document Description:** 3A-2a. Healthcare Formal Agreements

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:** Local Competition RFA Posting

## Submission Summary

**Ensure that the Project Priority List is complete prior to submitting.**

Page	Last Updated
1A. CoC Identification	10/23/2024
1B. Inclusive Structure	10/29/2024
1C. Coordination and Engagement	10/29/2024
1D. Coordination and Engagement Cont'd	10/29/2024
1E. Project Review/Ranking	10/29/2024
2A. HMIS Implementation	10/29/2024
2B. Point-in-Time (PIT) Count	10/29/2024
2C. System Performance	10/29/2024
3A. Coordination with Housing and Healthcare	10/29/2024
3B. Rehabilitation/New Construction Costs	10/28/2024
3C. Serving Homeless Under Other Federal Statutes	10/29/2024

<b>4A. DV Bonus Project Applicants</b>	10/29/2024
<b>4B. Attachments Screen</b>	10/29/2024
<b>Submission Summary</b>	No Input Required

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# **ADMISSIONS AND CONTINUED OCCUPANCY POLICY**

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**Greensboro Housing Authority, Greensboro, North Carolina**

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October 27, 2023

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# ADMISSIONS AND CONTINUED OCCUPANCY POLICY

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## ADMISSIONS AND CONTINUED OCCUPANCY POLICY

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This Admissions and Continued Occupancy Policy defines the Greensboro Housing Authority's policies for the operation of the Public Housing Program, incorporating Federal, State and local law. If there is any conflict between this policy and laws or regulations, the laws and regulations will prevail.

### 1.0 FAIR HOUSING

#### 1.1 *APPLICABLE STATUTES*

It is the policy of the Greensboro Housing Authority to fully comply with all Federal, State and local nondiscrimination laws; the Americans with Disabilities Act; and the U. S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity. The Greensboro Housing Authority shall affirmatively further fair housing in the administration of its public housing program.

No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, disability, marital status, gender identity, or sexual orientation be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the Greensboro Housing Authority's programs.

No inquiries shall be made about a person's sexual orientation or gender identity. However, the Greensboro Housing Authority may inquire about a person's sex in order to determine the number of bedrooms a household may be eligible for under the occupancy standards or to accurately complete HUD's 50058. To further its commitment to full compliance with applicable Civil Rights laws, the Greensboro Housing Authority will provide Federal/State/local information to applicants/residents of the Public Housing Program regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. Such information will be made available with the application, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made available at the Greensboro Housing Authority office.

The Greensboro Housing Authority will assist any family that believes they have suffered illegal discrimination by providing the family with copies of the appropriate housing discrimination forms. The Greensboro Housing Authority will also assist them in completing the forms if requested, and will provide them with the address of the nearest HUD office of Fair Housing and Equal Opportunity. The Greensboro Housing Authority will keep records of all complaints, investigations, notices and corrective actions for five years.

## 2.0 REASONABLE ACCOMMODATION

Sometimes people with disabilities may need a reasonable accommodation in order to take full advantage of the Greensboro Housing Authority housing programs and related services. When such accommodations are granted, they do not confer special treatment or advantage for the person with a disability; rather, they make the program accessible to them in a way that would otherwise not be possible due to their disability. The Reasonable Accommodation procedure clarifies how people can request accommodations and the guidelines the Greensboro Housing Authority will follow in determining whether it is reasonable to provide a requested accommodation. Because disabilities are not always apparent, the Greensboro Housing Authority will ensure that all applicants/residents are aware of the opportunity to request reasonable accommodations.

### 2.1 VERIFICATION OF ACCOMMODATION REQUEST

Greensboro Housing Authority is entitled to obtain information that is necessary to evaluate if a requested reasonable accommodation may be necessary because of a disability.

- A. If a person's disability is obvious, or otherwise known to the provider, and if the need for the requested accommodation is also readily apparent or known, Greensboro Housing Authority will not request any additional information.
- B. If the requestor's disability is obvious, but the need for the accommodation is not readily apparent or known, Greensboro Housing Authority may request information that is necessary to evaluate the disability related need for the accommodation.
- C. If the requestor's disability is not obvious, Greensboro Housing Authority may request reliable disability-related information that (1) is necessary to verify that the person meets the Fair Housing Act's definition of disability (i.e. has a physical or mental impairment that substantially limits one or more major life activities), (2) describes the needed accommodation, and (3) shows the relationship between the person's disability and the need for the requested information.

### 2.2 COMMUNICATION

All residents or their caretakers will be provided the Request for Reasonable Accommodation Form when requested. A resident may submit the request in writing, orally, or may use another equally effective means of communication to request the accommodation. All decisions granting

or denying requests for reasonable accommodations will be in writing and provided to the family within 30 days after the date upon which the request is submitted, or if applicable within 30 days after the date upon which any additional information or verification reasonably necessary for GHA's decision is provided. The notice will inform the family of the right to appeal the housing authority's decision.

Notifications of reexamination, inspection, appointment, or termination of assistance will include information about requesting a reasonable accommodation. Any notification requesting action by the tenant will include information about requesting a reasonable accommodation.

### **3.0 SERVICES FOR NON-ENGLISH SPEAKING RESIDENTS**

#### **3.1 NEEDS ASSESSMENT**

The Greensboro Housing Authority shall do its best, within reason, to assist people with Limited English Proficiency (LEP). This shall be accomplished by assessing the need of LEP persons using four factors. The GHA shall balance these factors in deciding what to do:

- A. The number or proportion of LEP persons served or encountered in the eligible service area;
- B. The Frequency with which LEP individuals come in contact with the program;
- C. The nature and importance of the program, activity, or service provided by the program; and
- D. The resources available to GHA and costs.

### **4.0 FAMILY OUTREACH**

#### **4.1 NOTIFICATION TO THE PUBLIC**

The Greensboro Housing Authority will publicize the availability and nature of the Public Housing Program for extremely low-income, very low income, and low-income families in a newspaper of general circulation, minority media, and by other suitable means.

The Greensboro Housing Authority will communicate the status of housing availability to other service providers in the community and inform them of housing eligibility factors and guidelines so they can make proper referrals for the Public Housing Program.

The objective of this effort is to develop a waiting list that is representative of the low-income community. A particular emphasis will be placed on attracting eligible individuals and families least likely to apply for public housing.

## **5.0 RIGHT TO PRIVACY**

### **5.1 FEDERAL PRIVACY ACT STATEMENT**

All adult members of both applicant and resident households are required to annually sign HUD Form 9886, Authorization for Release of Information and Privacy Act Notice. The Authorization for Release of Information and Privacy Act Notice states how family information will be released and includes the Federal Privacy Act Statement.

Any request for applicant or resident information will not be released unless there is a signed release of information request from the applicant or resident.

## **6.0 REQUIRED POSTINGS**

### **6.1 ACCESSIBLE DOCUMENTS**

In each of its offices, the Greensboro Housing Authority will post, in a conspicuous place and at a height easily read by all persons including persons with mobility disabilities, the following information:

- A. Statement of Policies and Procedures governing Admission and Continued Occupancy
- B. Notice of the status of the waiting list (opened or closed)
- C. A listing of all the communities by name, address, number of units, units designed with special accommodations, address of all community offices, office hours, telephone numbers, TDD numbers, and Resident Facilities and operation hours
- D. Income Limits for Admission
- E. Utility Allowance Schedule
- F. Current Schedule of Routine Maintenance Charges

- G. Dwelling Lease
- H. Grievance Procedure
- I. Fair Housing Poster
- J. Equal Opportunity in Employment Poster
- K. Any current Greensboro Housing Authority Notices

## **7.0 TAKING APPLICATIONS**

### ***7.1 APPLYING TO DIFFERENT LOCATIONS***

Families wishing to apply for the Public Housing Program will be required to complete an application for housing assistance. Completed applications will be accepted for all applicants and GHA will verify the information. Applications shall be completed electronically, available on GHA's website [www.gha-nc.org](http://www.gha-nc.org). Notice will be placed in GHA offices and advertisements placed in a newspaper of general circulation. GHA will follow its Reasonable Accommodation policy to address accommodations requests from elderly and disabled applicants.

Applications to reside in Parkview Apartments, Windhill Apartments, The Villas at Willow Oaks, Willow Oaks Townhomes, Windhill Court Apartments, and the Havens will be distributed, received and considered from each respective management office.

Applications are taken to compile a waiting list. Due to the demand for housing in the Greensboro Housing Authority jurisdiction, the Greensboro Housing Authority may take applications on an open enrollment basis, depending on the length of the waiting list.

Applicants will be required to complete the information on form HUD-92006, Supplement to Application for Federally Assisted Housing. The form gives applicants the option to identify an individual or organization that GHA may contact and the reason(s) the individual or organization may be contacted. The applicants must sign and date the form. If the applicant chooses to have more than one contact person or organization, the applicant must make clear to the Housing Authority the reason each person or organization may be contacted. GHA will allow the applicant to complete a form HUD-92006 for each contact and indicating the reason GHA may contact the individual or organization. For example, the applicant may choose to have a relative as a contact for emergency purposes and an advocacy organization for assistance for tenancy purposes.

Those applicants who choose not to provide the contact information should check the box indicating that they “choose not to provide the contact information” and sign and date the form.

Persons with disabilities who require a reasonable accommodation in completing an application may call the Greensboro Housing Authority to make special arrangements. A Telecommunication Device for the Deaf (TDD) is available for the deaf. The TDD telephone number is for free interpreters.

The application process will involve two phases. The first phase is the initial application for housing assistance or the pre-application. The pre-application requires the family to provide limited basic information (i.e. family composition, income, etc.) establishing any preferences to which they may be entitled. This first phase results in an apparently eligible family’s placement on the waiting list.

The second phase is the final determination of eligibility, referred to as the full application. The full application takes place when the family nears the top of the waiting list. GHA will ensure that verification of all preferences, eligibility, suitability and selection factors are current (less than 90 calendar days old) in order to determine the family’s final eligibility for admission into the Public Housing Program.

Applicants will also be given the opportunity to update their HUD Form 92006 if applicable and if they so desire.

## **8.0 ELIGIBILITY FOR ADMISSIONS**

### **8.1 INTRODUCTION**

There are five eligibility requirements for admission to public housing: (1) qualifies as a family, (2) has an income within the income limits, (3) meets citizenship/eligible immigrant criteria, (4) provides documentation of Social Security numbers, and (5) signs consent authorization documents. In addition to the eligibility criteria, families must also meet the Greensboro Housing Authority screening criteria in order to be admitted to public housing.

### **8.2 ELIGIBILITY CRITERIA**

Applicants and participants (including each member of the household and including, live-in aides, foster children, and foster adults) are required to disclose his/her Social Security Administration assigned SSN.

The best verification of the Social Security Number is the original Social Security card. If the card is not available, the Greensboro Housing Authority will accept letters from Social Security that establish and state the number. Documentation from other governmental agencies will also be accepted that establish and state the number. Driver's license, military ID, passports, or other official documents that establish and state the number are also acceptable.

If individuals state that they do not have a Social Security Number they will be required to sign a statement to this effect. An adult must sign for minor children. The Greensboro Housing Authority will not require any individual who does not have a Social Security Number to obtain a Social Security Number.

If a member of an applicant family indicates they have a Social Security Number, but cannot readily verify it, the family cannot be assisted until verification is provided.

If a member of a participating family indicates they have a Social Security Number, but cannot readily verify it, they shall be asked to certify to this fact and shall have up to 60 calendar days to provide the verification. If the individual is at least 62 years of age, they will be given 120 calendar days to provide the verification. If the individual fails to provide the verification within the time allowed, the family will be denied assistance or will have their assistance terminated.

- A. Family Status –all families must have a Head of Household or Co-Head of Household. Family includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:
1. A **family with or without children**. Such a family is defined as a group of people related by blood, marriage, adoption or affinity (regardless of actual or perceived sexual orientation, gender identity, or marital status) that live together in a stable family relationship and share resources.
    - a. Children temporarily absent from the home due to placement in foster care are considered family members.
    - b. Unborn children and children in the process of being adopted are considered family members for the purpose of determining bedroom size but are not considered family members for determining income limit.
  2. An **elderly family**, which is:
    - a. A family whose head (including co-head), spouse, or sole member is a person who is at least 62 years of age;



- b. Two or more persons who are at least 62 years of age living together; or
  - c. One or more persons who are at least 62 years of age living with one or more live-in aides.
3. A **near-elderly family**, which is:
- a. A family whose head (including co-head) and spouse, or sole member is at least 55 years of age but below the age of 62;
  - b. Two or more persons, who are at least 55 years of age but below the age of 62, living together; or
  - c. One or more persons, who are at least 55 years of age but below the age of 62, living with one or more live-in aides.
4. A **disabled family**, which is:
- a. A family whose head (including co-head), spouse, or sole member is a person with disabilities;
  - b. Two or more persons with disabilities living together; or
  - c. One or more persons with disabilities living with one or more live-in aides.
  - d. For purposes of qualifying for low-income housing, does not include a person whose disability is based solely on any drug or alcohol dependence.
5. A **displaced family**, which is a family in which each member, or whose sole member, has been displaced by governmental action, or whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws.
6. A **remaining member of a resident family** is a family member of an assisted family who remains in the unit when other family members have left the unit.

GHA will approve a temporary guardian to move into the unit after the individual has been screened for suitability for the program. GHA will work with the Department of Social Services as necessary.

7. A **single person** who is not an elderly or displaced person, a person with

disabilities, or the remaining member of a resident family.

8. Applicants for the public housing Parkview, Windhill Apartments, The Villas at Willow Oaks, Willow Oaks Townhomes, Windhill Court Apartments, and the Havens will be employed (an adult member employed full-time, at least 30 hours per week, for the past nine months) or be participants in the Community Supportive Services Program leading to employment and, if selected resident becomes unemployed, the resident will be given 90 days to find another job or be transferred to another GHA public housing unit. This requirement does not apply to the elderly or disabled families.

**B. Income Eligibility**

1. To be eligible for admission to Greensboro Housing Authority Communities the family's annual income must be within the low-income limit set by HUD. This means the family income cannot exceed 80 percent of the median income for the area. If the property includes Low Income Housing Tax Credit units, a lower income cap will apply.
2. Income limits apply only at admission and are not applicable for continued occupancy.
3. Income limit restrictions do not apply to families transferring within our Public Housing Program.
4. The Greensboro Housing Authority may allow police officers who would not otherwise be eligible for occupancy in public housing to reside in a public housing dwelling unit. Such occupancy must be needed to increase security for public housing residents. Their rent shall at least equal the cost of operating the public housing unit.

**C. Citizenship/Eligibility Status**

1. To be eligible for public housing each member of the family must be a citizen, national, or a non-citizen who has eligible immigration status under one of the categories set forth in Section 214 of the Housing and Community Development Act of 1980 (see 42 U.S.C. 1436a(a) or a citizen of the Republic of Marshall Islands, the Federated States of Micronesia, or the Republic of Palau. However, people in the last category are not entitled to housing assistance in preference to any United States citizen or national resident within Guam.
2. Family eligibility for assistance.
  - a. A family shall not be eligible for assistance unless at least one

member of the family residing in the unit is determined to have eligible status, with the exception noted below.

- b. Despite the ineligibility of one or more family members, a mixed family may be eligible for one of three types of assistance (See Section 13.5 for calculating rents under the non-citizen rule).
- c. A family without any eligible members and receiving assistance on June 19, 1995 may be eligible for temporary deferral of termination of assistance.

D. Social Security Number Documentation

1. To be eligible, all family members (including each member of the household and including, live-in aides, foster children, and foster adults) must provide a Social Security Number. Refusal to provide a Social Security number or a certification renders an applicant ineligible to participate in the program. Adults must certify for minors.
2. If applicants indicate they have a Social Security number but cannot readily verify the number, the family cannot be assisted until verification is provided and shall be given ninety (90) days to provide the verification.
3. If a person is already a program participant and has not disclosed his or her Social Security Number, it must be disclosed at the next re-examination or re-certification or no later than 90 days after being notified by GHA. If verification is not provided within the time allowed, the family should be denied admission or may have their assistance terminated.
4. If the Social Security card is not available, GHA will accept letters from the Social Security Administration that establish and state the number. Documentation from other governmental agencies will also be accepted that establishes and states the number. A driver's license, military ID, passport or other official documents that establishes and states the number is also acceptable.
5. GHA will use the Public and Indian Housing information Center (PIC) Tenant ID Management tool to generate a unique identifier (commonly referred to as an alternate ID) for those individuals who have not been assigned an SSN.
6. If a person is already a program participant and has not disclosed his or her Social Security Number, it must be disclosed at the next re-examination or re-certification.

7. Participants aged 62 or older as of January 31, 2010 whose initial eligibility determination was begun before January 31, 2010 are exempt from the required disclosure of their Social Security Number. This exemption continues even if the individual moves to a new assisted unit.

E. Signing Consent Forms

1. In order to be eligible, each member of the family who is at least 18 years of age, and each family head and spouse regardless of age, shall sign one or more consent forms.
2. The consent form must contain, at a minimum, the following:
  - a. A provision authorizing HUD or the Greensboro Housing Authority to obtain from State Wage Information Collection Agencies (SWICAs) any information or materials necessary to complete or verify the application for participation or for eligibility for continued occupancy;
  - b. A provision authorizing HUD or the Greensboro Housing Authority to verify with previous or current employers or other sources of income information pertinent to the family's eligibility for or level of assistance;
  - c. A provision authorizing HUD to request income information from the IRS and the SSA for the sole purpose of verifying income information pertinent to the family's eligibility or level of benefits;
  - d. A statement allowing the Greensboro Housing Authority permission to access the applicant's criminal record with any and all police and/or law enforcement agencies; and
  - e. A statement that the authorization to release the information requested by the consent form expires 15 months after the date the consent form is signed.

F. Special College Student Eligibility Rules

In order to be eligible for public housing, college students living outside their parent's or guardian's homes must have established a separate household for at least one year prior to applying to the public housing program. This will be verified by presenting to the Greensboro Housing Authority evidence of the

establishment of the separate household.

The college student must not be claimed as a dependent by parents or guardians on their IRS returns. This will be verified by examining the student's IRS return for the previous year. The Greensboro Housing Authority will examine the box that asks if someone else claimed them on their tax return.

If the student is receiving an athletic scholarship that includes over \$5000 a year for housing costs, the student shall not be eligible for public housing.

### 8.3 *SUITABILITY*

- B. The Greensboro Housing Authority will evaluate past conduct as an indicator of future conduct. Emphasis will be placed on whether a family's admission could reasonably be expected to have a detrimental effect on the development environment, other residents, Greensboro Housing Authority employees, or other people residing in the immediate vicinity of the property. Otherwise eligible families will be denied admission if they fail to meet the suitability criteria.
- C. The Greensboro Housing Authority will consider objective and reasonable aspects of the family's background, including the following:
  - 1. History of meeting financial obligations, especially rent, and any utility payments;
  - 2. Ability to maintain (or with assistance would have the ability to maintain) their housing in a decent and safe condition based on living or housekeeping habits and whether such habits could adversely affect the health, safety, or welfare of other residents;
  - 3. History of criminal activity by any household member involving crimes of physical violence against persons or property and any other criminal activity including drug-related criminal activity that would adversely affect the health, safety, or well-being of other residents or staff or cause damage to the property. In deciding whether to exercise their discretion to admit an individual or household that has engaged in criminal activity, The Greensboro Housing Authority will consider all of the circumstances relevant to the particular admission or eviction decision, including but not limited to: the seriousness of the offending action; the effect that eviction of the entire household would have on family members not involved in the criminal activity; and the extent to which the leaseholder has taken all reasonable steps to prevent or mitigate the criminal activity.

4. History of disturbing neighbors or destruction of property;
  5. Having committed fraud in connection with any Federal housing assistance program, including the intentional misrepresentation of information related to their housing application or benefits derived there from; and
  6. History of abusing alcohol in a way that may interfere with the health, safety, or right to peaceful enjoyment by others.
- D. The Greensboro Housing Authority will ask applicants to provide information demonstrating their ability to comply with the essential elements of the lease. The Greensboro Housing Authority will verify the information provided. Such verification may include but may not be limited to the following:
1. A credit check of the head, spouse, co-head, and any other adult family members;
  2. A rental history check of all adult family members;
  3. A criminal background check on all adult household members and youth 15 and above, including live-in aides. This check will be made through State or local law enforcement or court records in those cases where the household member has lived in the local jurisdiction for the last three years. Where the individual has lived outside the local area, the Greensboro Housing Authority may contact law enforcement agencies where the individual had lived or request a check through the FBI's National Crime Information Center (NCIC). The criminal background check will proceed after each adult household member has signed a consent form designed by the Greensboro Housing Authority.
  4. The information received as a result of the criminal background check shall be used solely for screening, lease enforcement and eviction purposes. The information derived from the criminal background check shall be shared only with employees of the Greensboro Housing Authority who have job-related need to have access to the information. The information shall be maintained confidentially, not misused or improperly disseminated, and destroyed once the purpose(s) for which it is requested has been accomplished and the period for filing a challenge to the Housing Authority's action has expired without a challenge or final disposition of any litigation has occurred;
  5. A check of the State's lifetime sex offender registration program for each

## **Admissions and Continued Occupancy Policy**

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adult household member, including live-in aides. No household with an individual registered under a State sex offender registration will be admitted to public housing. The Greensboro Housing Authority will check with our State registry and if the applicant has resided in another State(s), with that State(s)'s list. The Greensboro Housing Authority will utilize the US Department of Justice's Dru Sjodin National Sex Offender website as an additional resource.

6. If an applicant is denied housing based on either the criminal check or the sex offender registration program, the applicant will be informed of this fact and given the opportunity to dispute the accuracy of the information before the denial or eviction occurs. Applicants that are denied housing will be given a "Notice of Occupancy Rights under the Violence Against Women Act" which provides information on their rights and responsibilities under the Violence Against Women Act (VAWA). A copy of the HUD-approved Certification form shall also be provided with the notice.

### **8.4 GROUND S FOR DENIAL**

The Greensboro Housing Authority is not required or obligated to assist applicants who:

- B. Do not meet any one or more of the eligibility criteria;
- C. Do not supply information or documentation required by the application process;
- D. Have failed to respond to a written request for information or a request to declare their continued interest in the program;
- E. Have a history of not meeting financial obligations, especially rent;
- F. Do not have the ability to maintain (with assistance) their housing in a decent and safe condition where such habits could adversely affect the health, safety, or welfare of other residents;
- G. Have a history of criminal activity by any household member during the last five (5) years involving crimes of physical violence against persons or property and any other criminal activity including drug-related criminal activity that would

a diversely affect the health, safety, or well- being of other residents or staff or cause damage to the property;

An arrest record, alone, will not serve as sufficient evidence of criminal activity that can support an adverse admission decision. Before the Greensboro Housing Authority denies admission to an individual or household on the basis of criminal activity by a household member or guest, it will determine that the relevant

An arrest record can trigger an inquiry into whether there is sufficient evidence to determine that a person engaged in disqualifying criminal activity, but is not itself evidence on which to base a determination. The Greensboro Housing Authority can utilize other evidence, such as police reports detailing the circumstances of the arrest, witness statements, and other relevant documentation to assist them in making a determination that disqualifying conduct occurred. Reliable evidence of a conviction for criminal conduct that would disqualify an individual for tenancy may also be the basis for determining that the disqualifying conduct in fact occurred.

Being a victim of domestic violence, dating violence, sexual assault, or stalking is not an appropriate basis for denial of program assistance or for denial of admission, if the applicant otherwise qualifies for assistance or admission. The Authority will require verification in all cases where an applicant claims protection against an action proposed to be taken by the Authority involving such individual. Types of acceptable verifications are outlined in Section 23.2A of the ACOP, and must be submitted within 14 business days after receipt of the Housing Authority's written request for verification.

- H. Have a history of disturbing neighbors or destruction of property;
- I. Currently owes rent or other amounts to any housing authority in connection with their public housing or HCVP programs;
- J. Have committed fraud, bribery or any other corruption in connection with any Federal housing assistance program, including the intentional misrepresentation of information related to their housing application or benefits derived there from;
- K. Were evicted from federally assisted housing within the past five (5) years because of drug-related criminal activity. The five-year limit is based on the date of such eviction, not the date the crime was committed.

However, the Greensboro Housing Authority may admit the household if the PHA

determines:

1. The evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program approved by the Greensboro Housing Authority; or
2. The circumstances leading to the eviction no longer exist (for example, the



criminal household member is imprisoned or has died).

- L. Are currently engaging in the illegal use of a controlled substance. For the purposes of this section, a member is “currently engaged in” the criminal activity if the person has engaged in this behavior recently enough to justify a reasonable belief that the behavior is current;

The Greensboro Housing Authority determines that it has reasonable cause to believe that a household member’s illegal use or pattern of illegal use of a drug may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents;

With respect to criminal activity described in paragraphs J, K, L, and M of this Section, Greensboro Housing Authority may require an applicant to exclude a household member in order to be admitted to public housing where that household member has participated in or been culpable for actions described in paragraphs J, K, L and M that warrants denial. New admissions of medical marijuana users are prohibited (this does not include FDA-approved marijuana synthetics). HUD has ruled that federal law preempts state law on this issue.

- M. The Greensboro Housing Authority determines that it has reasonable cause to believe that a household member’s abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents;
- N. Have engaged in or threatened abusive or violent behavior towards any Greensboro Housing Authority staff member or resident;
- O. Fugitive felons, parole violators, and persons fleeing to avoid prosecution, or custody or confinement after conviction for a crime, or attempt to commit a crime, that is a felony under the laws of the place from which the individual flees;
- P. **Denied for Life:** If any family member has been convicted of manufacturing or producing methamphetamine (speed) in a public housing development or in a HCVP assisted property, or on the premises of other federally assisted housing;
- Q. **Denied for Life:** Has a lifetime registration under a State sex offender registration program.
- R. **Violence Against Women:** No applicant for public housing who has been a victim of domestic violence, dating violence, or stalking shall be denied admission into the program if they are otherwise qualified and can provide certification per GHA’s Violence Against Women policy.

In determining whether or not to deny admission for illegal drug use by a household member who is no longer engaging in such abuse, or for abuse or a pattern of abuse of alcohol by a household member who is no longer engaging in such abuse, the Greensboro Housing Authority may consider whether such household member:

1. Is participating in a supervised drug or alcohol rehabilitation program;
2. Has successfully completed a supervised drug or alcohol rehabilitation program; or
3. Has otherwise been successfully rehabilitated.

For this purpose, the Greensboro Housing Authority will require the applicant to submit evidence of the household member's current participation in, or successful completion of, a supervised drug or alcohol rehabilitation program or evidence of otherwise having been rehabilitated successfully.

If the Greensboro Housing Authority denies admission to the authority's public housing program on the basis of a criminal record, the housing authority must notify the household of the proposed action and must provide the person with the criminal record and the applicant (head of household) with a copy of the criminal record and an opportunity to dispute the accuracy and relevance of that record. The applicant will have ten (10) calendar days to dispute the accuracy and relevance of the record in writing. If the Greensboro Housing Authority does not receive the dispute within the allotted time, the applicant will be denied.

#### **8.5 *INFORMAL REVIEW***

- B. If the Greensboro Housing Authority determines that an applicant does not meet the criteria for receiving public housing assistance, the Greensboro Housing Authority will promptly provide the applicant with written notice of the determination. The notice must contain a brief statement of the reason(s) for the decision and state that the applicant may request, in writing, an informal review of the decision within 10 calendar days of the denial. The Greensboro Housing Authority will describe how to obtain the informal review.

The informal review may be conducted by any person designated by the Greensboro Housing Authority, other than a person who made or approved the decision under review or subordinate of this person. The applicant must be given the opportunity to present written or oral objections to the Greensboro Housing Authority's decision. The Greensboro Housing Authority must notify the applicant of the final decision within 14 calendar days after the informal review, including a brief statement of the reasons for the final decision.

- C. The applicant family may request that the Greensboro Housing Authority provide for an Informal Hearing after the family has notification from the United States Citizenship and Immigration Services (USCIS) decision on their citizenship status on appeal, or in lieu of request of appeal to the USCIS. This request must be made by the participant family within 30 calendar days of receipt of the Notice of Denial or Termination of Assistance, or within 30 calendar days of receipt of the USCIS appeal decision.

For the applicants the Informal Hearing Process above will be utilized with the exception that the applicant family will have up to 30 calendar days of receipt of the Notice of Denial or Termination of Assistance, or of the USCIS appeal decision.

## **9.0 MANAGING THE WAITINGLIST**

### **9.1 *OPENING AND CLOSING THE WAITING LIST***

Opening of the waiting list will be announced with a public notice stating that applications for public housing will again be accepted. The public notice will state where, when, and how to apply. The notice will be published in a local newspaper of general circulation and also by any available minority media. The public notice will state any limitations to who may apply.

The notice will state that applicants already on waiting lists for other housing programs must apply separately for this program and such applicants will not lose their place on other waiting lists when they apply for public housing.

Closing of the waiting list will also be announced with a public notice. The public notice will state the date the waiting list will be closed and for what bedroom sizes. The public notice will be published in a local newspaper of general circulation and also by any available minority media.

### **9.2 *ORGANIZATION OF THE WAITING LIST***

The waiting list will be maintained in accordance with the following guidelines:

- A. The application will be a permanent file;
- B. Any contact between the Greensboro Housing Authority and the applicant will be

### **9.3 PURGING THE WAITING LIST**

The Greensboro Housing Authority will update and purge its waiting list at least annually to ensure that the pool of applicants reasonably represents the interested families for whom the Greensboro Housing Authority has current information, i.e. applicant's address, family composition, income category, and preferences. Applicants will also be given the opportunity to update their HUD Form 92006 if applicable and if they desire.

### **9.4 REMOVAL OF APPLICANTS FROM THE WAITING LIST**

The Greensboro Housing Authority will not remove an applicant's name from the waiting list unless:

- A. The applicant requests in writing that the name be removed;
- B. The applicant fails to respond to a written request for information or a request to declare their continued interest in the program;
- C. The applicant does not meet either the eligibility or suitability criteria for the program; or
- D. The applicant is housed.

Applicants will be offered the right to an informal review before being removed from the waiting list.

### **9.5 NOTIFICATION OF NEGATIVE ACTIONS**

Any applicant whose name is being removed from the waiting list will be notified by the Greensboro Housing Authority, in writing, that they have ten (10) calendar days from the date of the written correspondence to present mitigating circumstances or request in writing an informal review. The letter will also indicate that their name will be removed from the waiting list if they fail to respond within the timeframe specified. The Greensboro Housing Authority system of removing applicant names from the waiting list will not violate the rights of persons with disabilities. If an applicant claims that their failure to respond to a request for information or updates was caused by a disability, the Greensboro Housing Authority will verify that there is in fact a disability and the disability caused the failure to respond, and provide a reasonable accommodation. An example of a reasonable accommodation would be to reinstate the applicant on the waiting list based on the date and time of the original application.

**10.0 TENANT SELECTION AND ASSIGNMENT PLAN****10.1 PREFERENCES**

The Greensboro Housing Authority will select families based on the following preferences within each bedroom size category and on our local housing needs and priorities:

Disaster Victims who are Public Housing residents in another jurisdiction affected by a natural disaster mandated by the Department of Housing and Urban Development or victims impacted by a natural disaster, as designated by local, state or federal government, within the Greensboro Housing Authority's jurisdiction.

- A.
- Families with an adult member employed part-time for the past 6 months (part-time is at least 15 hours per week); and continuing. Graduates must be gainfully employed within a reasonable time frame. Families referred by the continuum of care may qualify for this preference.
  - Or, enrolled full-time in an accredited non-profit institution of higher education (university, college, or community college); Full-time students must have completed at least the first year of their academic requirements and continuing.
  - Or, enrolled in a job-training program, or a program that prepares someone for a job. Persons on job training or job readiness programs must complete at least 50% of their course work; and college graduates or graduates of job training or job readiness programs must be gainfully employed to receive this preference.
  - Or, if the head and spouse, or sole member is age 62 or older, or is a person with disabilities.
  - Or, families referred by the Continuum of Care may qualify for this preference. These families must be receiving documented supportive services and have been defined as chronically homeless individuals or families.
- B. Displaced person(s): Individuals or families displaced by public or private action. This preference includes individuals or families who have received a written condemnation notice from the City of Greensboro indicating condemnation of their rental unit is imminent. Renters who damage the rental home or are otherwise responsible for causing the condemnation are not eligible for this preference.
- C. All other non-preference applicants.
- D. Families with a preference residing outside of GHA jurisdiction at the time of the application.

Based on the above preferences, all families in the D i s a s t e r preference will be offered housing before any families in the preference A, all families in preference A will be offered housing before any families in preference B, and preference B families will be offered housing before any families in preference C, and so forth.

The date and time of application will be noted and utilized to determine the sequence within the above-prescribed preferences.

**Accessible Units:** Accessible units will be first offered to families who may benefit from the accessible features. Applicants for these units will be selected utilizing the same preference system as outlined above. If there are no applicants who would benefit from the accessible features, the units will be offered to other applicants in the order that their names come to the top of the waiting list. Such applicants, however, must sign a release form stating they will accept a transfer (at their own expense) if, at a future time, a family requiring an accessible feature applies or requires a transfer from a non-accessible unit. Any family required to transfer will be given a 30-calendar day notice.

## 10.2 ASSIGNMENT OF UNIT SIZE

- Greensboro Housing Authority (GHA) units' bedrooms are of standard size. GHA recognizes HUD's rules related to Occupancy Standards in which two people are expected to share each bedroom. Accordingly, applicants/residents will be matched to a unit size that can adequately fit the number of family members and benefit individual circumstances. The following table depicts the manner in which, in general, individual/families are assigned units:

Number of Bedrooms	Number of Persons	
	Minimum	Maximum
0	N/A	1
1	1	2
2	2	4
3	3	6
4	5	8
5	7	10

- The largest unit size that a family may be offered would provide no more than one bedroom per family member. A single disable or elderly person with a live-in aide will, at the minimum, be assigned a one-bedroom unit. Studio apartments will first be assigned to persons who declare that preference.

3. In order to maximize utilization, GHA will take the following factors into consideration when determining family composition:
  - a. The presence of children to be born to a pregnant woman
  - b. Children who are in the process of being adopted or under consideration for custody
  - c. Children currently under a 50% or more joint custody decree
  - d. Children who are temporarily away at school
  - e. Children who are temporarily in foster care
  - f. Families/individuals who have a live-in aide (but not a live-in aide's family)
4. In addition, a family consisting of a pregnant woman (with no other persons) will be treated as a two-person family. A single head of household parent will not be required to share a bedroom with his/her child, unless this is requested by the family.
5. The following exceptions may apply:
  - a. A validated request for the accommodation of a disability indicating the need for a single-bedroom occupancy (i.e., the individual needs space to store medical equipment and supplies)
  - b. A family with persons of different generations and opposite sex, unless the family agrees they can share a bedroom
  - c. The family includes children of opposite sex above age nine, unless the family agrees they can share the room

### ***10.3 SELECTION FROM THE WAITING LIST***

The Greensboro Housing Authority shall follow the statutory requirement that at least 40% of newly admitted families in any fiscal year are families whose annual income is the higher of either 30% of the area median income or the Federal poverty level (defined at <http://www.huduser.org/portal/datasets/il/ill4/index.html> as extremely low income). To ensure this requirement is met, the Greensboro Housing Authority shall monitor the incomes of both newly-admitted families and families on the waiting list on a quarterly basis. If it appears that the requirement to house extremely low income families will not be met, the Housing Authority will skip higher income families on the waiting list to reach extremely low-income families.

**10.4 DECONCENTRATION POLICY**

It is the Greensboro Housing Authority's policy to provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income communities and lower income families into higher income communities, enhancing the economic well-being of its current residents, and encouraging higher income residents who cannot yet afford the private marketplace to remain in public housing. Toward this end, families on the waiting list may be skipped over to reach other families with a lower or higher income and programs will be offered in partnership with various Greensboro supportive service providers to help residents achieve self-sufficiency.

This policy may not be construed to impose or require any specific income or racial quotas for any community.

**10.5 DECONCENTRATION INCENTIVES**

The Greensboro Housing Authority may offer one or more incentives to encourage applicant families whose income classification would help to meet the deconcentration goals of a particular community. This will include the use of flat rents by higher income residents that cannot afford the private marketplace.

**10.6 OFFER OF A UNIT**

When a unit becomes available, the first family on the waiting list who has the highest priority for this type of unit and whose income category would help to meet the deconcentration goal and/or the income-targeting goal will be contacted.

The family will be offered the opportunity to view the unit. The family will have 24 hours to accept or reject the unit. This verbal offer and the family's decision must be documented in the resident file.

**10.7 REJECTION OF UNIT**

If the family rejects a unit the family will be placed at the bottom of the waiting list and the application date and time will be changed to the date and time of the rejection. If the family rejects for good cause, they will retain their place on the waiting list. Good cause includes reasons related to proximity to work and childcare.

**10.8 ACCEPTANCE OF UNIT**

The family will be required to sign a lease that will become effective no later than three (2) business days after the date of acceptance or the business day after the day the unit becomes available, whichever is later. The initial term of the lease is one (1) year. During that one-year period, the lease shall be enforced thereby rendering the resident ineligible for any other GHA program that would require resident to terminate the lease.



Prior to signing the lease, all families (head of household and spouse) will be required to attend the Lease and Occupancy Orientation when they are initially accepted for occupancy. The family will not be housed if they have not attended the orientation. Applicants who provide prior notice of an inability to attend the orientation will be rescheduled. Failure of an applicant to attend the orientation, without good cause, may result in the cancellation of the occupancy process.

The applicant will be provided a copy of the lease, the grievance procedure, utility allowances, utility charges, and the current schedule of routine maintenance charges. These documents will be explained in detail. The applicant will sign a form that they have reviewed these documents and that they have reviewed them with Housing Authority personnel. The form will be filed in the resident's file.

The signing of the lease and the review of financial information are to be privately handled. The head of household and all adult family members will be required to execute the lease prior to admission. One executed copy of the lease will be furnished to the head of household and the Greensboro Housing Authority will retain the original executed lease in the resident's file. A copy of the grievance procedure will be attached to the resident's copy of the lease.

The family will pay a security deposit at the time of lease signing. The security deposit will be equal to the Total Resident Payment or minimum amount set by bedroom size whichever is greater.

A minimum of \$100.00 for an efficiency or one-bedroom apartment, \$150.00 for a two or three-bedroom apartment, or \$200.00 for a four or five-bedroom apartment shall be paid in advance for security deposit. In exceptional situations, the Greensboro Housing Authority reserves the right to allow a new resident to pay their security deposit in installments.

In the case of a move within public housing, the security deposit for the first unit will be transferred to the second unit. Additionally, if the security deposit for the second unit is greater than that for the first, the difference will be collected from the family. Conversely, if the security deposit is less, the difference will be refunded to the family.

In the event that there are costs attributable to the family for bringing the first unit into condition for re-renting, the family shall be billed for these charges.

## **11.0 LEASING**

Public housing leases are the basis of the legal relationship between the housing authority and the tenant. All units must be occupied pursuant to a dwelling lease agreement that complies with that complies with HUD's regulations.

## 11.1 OVERVIEW

An eligible family may occupy a public housing dwelling unit under the terms of a lease. The lease must meet all regulatory requirements, and must also comply with applicable state and local laws and codes.

The term of the lease must be for a period of 12 months, renewable for subsequent month terms, except that GHA will not renew the lease if the family has violated the community service requirement [24 CFR 966.4(a) (2)].

This chapter contains regulatory information, when applicable, as well as the GHA's policies governing leasing issues.

## 11.2 LEASE ORIENTATION

After unit acceptance but prior to occupancy, a GHA representative will provide a lease orientation to the family. The head of household or spouse is required to attend.

- A. When families attend the lease orientation, they will be provided with:
1. A copy of the lease
  2. A copy of GHA's grievance procedure
  3. A copy of the Rules and Regulations
  4. A copy of GHA's schedule of maintenance charges
  5. A copy of the pamphlet *Protect Your Family From Lead in Your Home*
  6. A copy of "Is Fraud Worth It?" (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse
  7. A copy of "What You Should Know about EIV," a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2010-19
  8. Information about the protections afforded by the Violence against Women Act of 2005 (VAWA) to victims of domestic violence, dating violence, and stalking.
- B. Topics to be discussed will include:

1. Applicable deposits and charges
2. Review and explanation of lease provisions
3. Unit maintenance and work orders
4. GHA's reporting requirements
5. Explanation of occupancy forms
6. Community service requirements
7. Family choice of rent
8. VAWA protections

### ***11.3 EXECUTION OF LEASE***

The head of household, spouse or co-head, and all other adult members of the household will be required to sign the public housing lease prior to tenancy. An appointment will be scheduled for the parties to execute the lease. The head of household will be provided a copy of the executed lease and GHA will retain a copy in the resident's file.

Files for households that include a live-in aide will contain file documentation signed by the live-in aide stating that the live-in aide is not a party to the lease and is not entitled to GHA's assistance. The live-in aide is only approved to live in the unit while serving as the attendant for the participant family member.

### ***11.4 MODIFICATIONS TO THE LEASE***

The lease may be modified at any time by written agreement of the tenant and the [24 CFR966.4(a)(3)].

The family will have 30 days to accept the revised lease. If the family does not accept the offer of the revised lease within that 30 day timeframe, the family's tenancy will be terminated for other good cause in accordance with the policies in Chapter 20.

Schedules of special charges and rules and regulations are subject to modification or revision. Because these schedules are incorporated into the lease by reference, residents and resident organizations must be provided at least thirty days written notice of the reason(s) for any proposed modifications or revisions, and must be given an opportunity to present written comments. The notice must be delivered directly or mailed to each tenant; or posted in at least three conspicuous places within each structure or building in which the affected dwelling units are located, as well as in a conspicuous place at the

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project office, if any, or if none, a similar central business location within the project. Comments must be taken into consideration before any proposed modifications or revisions become effective [24 CFR 966.5].

After the proposed revisions become effective they must be publicly posted in a conspicuous manner in the project office and must be furnished to applicants and tenants on request [24 CFR 966.5].

When GHA proposes to modify or revise schedules of special charges or rules and regulations, GHA will post a copy of the notice in the central office, and will mail a copy of the notice to each resident family. Documentation of proper notice will be included in each resident file.

The lease will be amended to reflect all changes in family composition.

If, for any reason, any member of the household ceases to reside in the unit, the lease will be amended by drawing a line through the person's name. The head of household and GHA will be required to initial and date the change.

If a new household member is approved by GHA to reside in the unit, the person's name and birth date will be added to the lease. The head of household and GHA will be

required to initial and date the change. If the new member of the household is an adult, she/he will also be required to sign and date the lease.

Policies governing when and how changes in family composition must be reported are contained in Chapter 16, "Reexaminations."

### **11.5 SECURITY DEPOSITS [24 CFR 966.4(B) (5)]**

Residents must pay a security deposit to the GHA at the time of admission. The amount of the security deposit will be equal to the greater of one month's rent or \$100.00 for an efficiency or one-bedroom apartment, or \$200.00 for a four or five-bedroom apartment. However, the amount of the deposit will in no case exceed two month's rent. The security deposit may be paid in full or can be paid in installments of not less than \$25.00 per month until paid in full.

GHA will hold the security deposit for the period the family occupies the unit. GHA will not use the security deposit for rent or other charges while the resident is living in the unit.

Within 30 days of move-out, GHA will refund to the resident the amount of the security deposit in accordance with North Carolina law, less any amount needed to pay the cost of unpaid rent, damages listed on the move-out inspection report that exceed normal

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wear and tear, and other charges due under the lease. If the resident disagrees with the amount charged, GHA will provide a meeting to discuss the charges.

If the resident transfers to another unit, GHA will transfer the security deposit to the new unit. The tenant will be billed for any maintenance or other charges due for the “old” unit.

### ***11.6 PAYMENTS UNDER THE LEASE***

The tenant rent is due and payable at GHA designated locations on the first of every month. If the first falls on a weekend or holiday, the rent is due and payable on the first business day thereafter.

If a family’s tenant rent changes, GHA will notify the family of the new amount and the effective date by sending a "Notice of Change to Lease Contract" which will become an attachment to the lease.

### ***11.7 MAINTENANCE AND DAMAGE CHARGES***

When applicable, families will be charged for maintenance and/or damages according

to GHA’s current schedule. Work that is not covered in the schedule will be charged based on the actual cost of labor and materials to make needed repairs (including overtime, if applicable).

Notices of maintenance and damage charges will be mailed monthly and will be in accordance with requirements regarding notices of adverse actions. Charges are due and payable two weeks after billing. If the family requests a grievance hearing within the required timeframe, GHA may not take action for nonpayment of the charges until the conclusion of the grievance process.

Nonpayment of maintenance and damage charges is a violation of the lease and is grounds for eviction.

## **12.0 INCOME, EXCLUSIONS, AND DEDUCTIONS FROM INCOME**

To determine annual income, the Greensboro Housing Authority counts the most recent annual income, as available in HUD’s Enterprise Income Verification (EIV) report, as allowed by PIH Notice 2013-3, of all family members, excluding the types and sources of income that are specifically excluded. Once the annual income is determined, the Greensboro Housing Authority subtracts all allowable deductions (allowances) to determine the Total Resident Payment. If a tenant disputes the EIV-reported income information and is unable to provide acceptable documentation to resolve the dispute,

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GHA will request written third-party verification. GHA will continue to verify income from sources not available in EIV.

### 12.1 INCOME

Annual income means all amounts, monetary or not, that:

- A. Go to (or on behalf of) the family head or spouse (even if temporarily absent) or to any other family member; or
- B. Are not specifically excluded from annual income.

GHA will annualize anticipated cyclical or seasonal income (i.e., \$2,000 per month x 8 months, \$400 per month x 4 months) from all known sources for families with seasonal or cyclical employment up and until the next annual recertification is due. Families with cyclical or seasonal income will be advised that interim recertifications will not be conducted unless there has been an unexpected change in income during that period. The policy does not exempt participants from reporting income in excess of the cyclical income.

Annual income includes, but is not limited to:

- A. The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services.
- B. The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness are not used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession is included in income, except to the extent the withdrawal is a reimbursement of cash or assets invested in the operation by the family.
- C. Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness are not used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from an investment is included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income

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includes the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD. As permitted by PIH Notice 2013-3, GHA will accept a family's self-declaration of the amount of assets of less than \$5,000, and the amount of income expected to be received from those assets. Income that could have been derived from assets worth more than \$1000 that were disposed of for less than fair market value within the past two years will be counted as income. Where the family net assets exceed \$5000, GHA will require supporting documentation (e.g. bank statements) to confirm the authenticity of those assets.

- D. The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount. (However, deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts are excluded.)
- E. Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay. (However, lump sum additions such as insurance payments from worker's compensation are excluded.)
- F. When families report zero income and have no income excluded for rent computation, GHA has an obligation to pursue verification of income that reflects the family's lifestyle.
- G. Welfare assistance
  - 1. Welfare assistance payments
    - a. Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) program are included in annual income only to the extent such payments:
      - i. Qualify as assistance under the TANF program definition at 45
      - ii. Are not otherwise excluded under paragraph Section 11.2 of this policy.
    - b. If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be

included as income consists of:

- i. The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus
- ii. The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this requirement is the amount resulting from one application of the percentage.

2. Imputed welfare income

- a. A family's annual income includes the amount of imputed welfare income (because of specified welfare benefits reductions from either welfare fraud or the failure to comply with economic self-sufficiency requirements, as specified in notice to the Greensboro

Housing Authority by the welfare agency) plus the total amount of other annual income.

- b. At the request of the Greensboro Housing Authority, the welfare agency will inform the Greensboro Housing Authority in writing of the amount and term of any specified welfare benefit reduction for a family member, and the reason for such reduction, and will also inform the Greensboro Housing Authority of any subsequent changes in the term or amount of such specified welfare benefit reduction. The Greensboro Housing Authority will use this information to determine the amount of imputed welfare income for a family.

A family's annual income includes imputed welfare income in family reexamination of family income and composition, during the term of the welfare benefits reduction (as specified in information provided to the Greensboro Housing Authority by the welfare agency).

- c. The amount of the imputed welfare income is offset by the amount of additional income a family receives that commences after the time the sanction was imposed. When such additional income from other sources is at least equal to the imputed welfare income, the imputed welfare income is reduced to zero.
- d. The Greensboro Housing Authority will not include imputed



welfare income in annual income if the family was not an assisted resident at the time of the sanction.

- e. If a resident is not satisfied that the Greensboro Housing Authority has calculated the amount of imputed welfare income in accordance with HUD requirements, and if the Greensboro Housing Authority denies the family's request to modify such amount, then the Greensboro Housing Authority shall give the resident written notice of such denial, with a brief explanation of the basis for the Greensboro Housing Authority's determination of the amount of imputed welfare income. The Greensboro Housing Authority's notice shall also state that if the resident does not agree with the determination, the resident may grieve the decision in accordance with our grievance policy. The resident is not required to pay an escrow deposit for the portion of the resident's rent attributable to the imputed welfare income in order to obtain a grievance hearing.
  
- f. Relations with welfare agencies
  - 1). The Greensboro Housing Authority will ask welfare agencies to inform it of any specified welfare benefits reduction for a family member, the reason for such reduction, the term of any such reduction, and any subsequent welfare agency determination affecting the amount or term of a specified welfare benefits reduction. If the welfare agency determines a specified welfare benefits reduction for a family member, and gives the Greensboro Housing Authority written notice of such reduction, the family's annual incomes shall include the imputed welfare income because of the specified welfare benefits reduction.
  
  - 2). The Greensboro Housing Authority is responsible for determining the amount of imputed welfare income that is included in the family's annual income as a result of a specified welfare benefits reduction as determined by the welfare agency, and specified in the notice by the welfare agency to the housing authority. However, the Greensboro Housing Authority is not responsible for determining whether a reduction of welfare benefits by the welfare agency was correctly determined by the welfare agency in accordance with welfare program requirements and procedures, nor for providing the opportunity for review or hearing on such welfare agency determinations.

- 3). Such welfare agency determinations are the responsibility of the welfare agency, and the family may seek appeal of such determinations through the welfare agency's normal due process procedures. The Greensboro Housing Authority shall rely on the welfare agency notice to the Greensboro Housing Authority of the welfare agency's determination of a specified welfare benefits reduction.
- H. Periodic and determinable allowances, such as alimony, child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling.
  - I. All regular pay, special pay, and allowances of a member of the Armed Forces. (Special pay to a member exposed to hostile fire is excluded.)

## 12.2 ANNUAL INCOME

Annual income does not include the following:

- A. Income from employment of children (including foster children) under the age of 18 years;
- B. Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the resident family, who are unable to live alone);
- C. Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains, and settlement for personal or property losses;
- D. Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
- E. Income of a live-in aide;
- F. The full amount of student financial assistance paid directly to the student or to the educational institution unless it is an athletic scholarship that includes assistance for housing costs and that portion is included in income;
- G. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;

**H. The amounts received from the following programs:**

1. Amounts received under training programs funded by HUD;
2. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
3. Amounts received by a participant in other publicly assisted programs that are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and that are made solely to allow participation in a specific program;
4. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the Housing Authority or owner, on a part-time basis, that enhances the quality of life in the community. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the Greensboro Housing Authority Board of Commissioners. No resident may receive more than one such stipend during the same period of time;
5. Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program;
6. Temporary, nonrecurring or sporadic income (including gifts). This specifically includes temporary income payments from the U.S. Census Bureau, defined as employment lasting no longer than 180 days per year and not culminating in permanent employment;
7. Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
8. Earnings in excess of \$480 for each full-time student 18 years old or older

(excluding the head of household and spouse);

9. Adoption assistance payments in excess of \$480 per adopted child;
10. Deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts;
11. Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit;
12. Amounts paid by a State agency to a family with a member who has a disability and is living at home to offset the cost of services and equipment needed to keep the disabled family member at home; or
13. Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility of benefits. These exclusions include:
  - a) The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 5044(g), 5058);
  - b) Payments to Volunteers under the Domestic Volunteer Services Act of 1973;
  - c) Payments received under the Alaska Native Claims Settlement Act;
  - d) Income from sub marginal land of the U.S. that is held in trust for certain Indian tribes;
  - e) Payments made under HHS's Low-Income Energy Assistance Program;
  - f) Income from the disposition of funds of the Grand River Band of Ottawa Indians;
  - g) The first \$2000 per capita shares received from judgment funds awarded by the Indian National Gaming Commission or the U.S. Claims Court, the interests of individual Indians in trust or restricted lands, and the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trusts or restricted lands. This exclusion does not include proceeds of gaming operations regulated by the Commission;
  - h) Amounts of scholarships funded under title IV of the Higher Education

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Act of 1965 (20 U.S.C. 1070), including awards under federal work-study programs or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu);

- i) Payments received under the Older Americans Act of 1965;
- j) Payments from Agent Orange Settlement;
- k) Payments received under the Maine Indian Claims Act;
  
- l) The value of childcare under the Child Care and Development Block Grant Act of 1990;
  
- m) Earned income tax credit refund payments;
- n) Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation;
- o) Payments for living expenses under the AmeriCorps Program;
- p) Any allowance paid under the provisions of 38 U.S.C. 1883(c) to children of Vietnam veterans born with spina bifida, children of women Vietnam veterans born with certain birth defects, and children of certain Korean service veterans born with spina bifida;
- q) Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance;
- r) Allowances, earnings and payments to individuals participating in programs under the Workforce Investment Act of 1998;
- s) Any amount received under the School Lunch Act and the Child Nutrition Act of 1966 (42 U.S.C. 1780(b)), including reduced-price lunches and food under the Special Supplemental Food Program for Women, Infants, and Children (WIC);
- t) Payments, funds or distributions authorized, established, or directed by the Seneca Nation Settlement Act of 1990 (25 U.S.C. 1774f(b));
- u) Payments from any deferred U.S. Department of Veterans Affairs disability benefits that are received in a lump sum amount or in prospective monthly amounts (42 U.S.C. 1437a(b)(4));

- v) Compensation received by or on behalf of a veteran for service-connected disability, death, dependency, or indemnity compensation as provided by an amendment by the Indian Veterans Housing Opportunity Act of 2010 (Pub. L. 111–269) to the definition of income applicable to programs authorized under the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4101) and administered by the Office of Native American Programs;
- w) A lump sum or a periodic payment received by an individual Indian pursuant to the Class Action Settlement Agreement in the case entitled *Elouise Cobell et al. v. Ken Salazar et al.*, United States District Court, District of Columbia, for a period of one year from the time of receipt of that payment as provided in the Claims Resolution Act of 2010 (Pub. L. 111–291);
- x) Any amounts in an “individual development account” as provided by the Assets for Independence Act, as amended in 2002 (Pub. L. 107- 110, 42 U.S.C. 604(h)(4));
- y) Per capita payments made from the proceeds of Indian Tribal Trust Cases as described in PIH Notice 2013-30 “Exclusion from Income of Payments under Recent Tribal Trust Settlements” (25 U.S.C. 117b(a)); and
- z) Major disaster and emergency assistance received by individuals and families under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Pub. L. 93–288, as amended) and comparable disaster assistance provided by states, local governments, and disaster assistance organizations (42 U.S.C. 5155(d)); The Greensboro Housing Authority will not provide exclusions from income in addition to those already provided for by HUD
- aa) ABLÉ accounts created under the Achieving a Better Life Experience Act of 2014 (ABLE Act) are excluded from the calculation of both income and assets.

### **12.3 EARNED INCOME DISALLOWANCE**

1. The incremental earnings due to employment during a cumulative 12-month period following date of initial hire shall be excluded. This exclusion is only available to the following families:
  - a. Families whose income increases as a result of employment of a family

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member who was previously unemployed for one or more years. Previously unemployed includes a person who has earned in the twelve months previous to employment, no more than would be received for 10 hours of work per week for 50 weeks at the established minimum wage;

- b. Families whose income increases as a result of increased earnings by a family member during participation in any economic self-sufficiency or other job training program; or

- c. Families who are or were, within 6 months, assisted under a State

TANF or Welfare –to-Work Program and received at least \$500 in benefits.

During the second cumulative 12-month period after the date of initial hire, 50% of the increased income shall be excluded from income.

The disallowance of increased income of an individual family member is limited to a lifetime 48-month period. It only applies for 12 months of the 100% exclusion and 12 months of the 50% exclusion. This is true if it is implemented prior to July 1, 2017. After July 1, 2017, the lifetime Disallowance will end 24 months after it began.

(While HUD regulations allow for the housing authority to offer an escrow account in lieu of having a portion of their income excluded under this paragraph, it is the policy of this housing authority to provide the exclusions in all cases.)

- 2. The Greensboro Housing Authority will determine seasonally-employed residents' and applicants' rent using one of two HUD-approved rent calculation methods. Residents will be informed of both methods and will be given the opportunity to select which method they want used when their rent is calculated. The applicant or resident will be required to select one of the two calculations methods: Method 1 and Method 2. For Method 1 a residents' actual income is annualized and an interim reexamination is conducted. For Method 2 a resident's anticipated income from all known sources is used with the support from a history of previous years income – no interim reexamination is conducted.

### **12.4 DEDUCTIONS FROM ANNUAL INCOME**

The following deductions will be made from annual income:

- A. \$480 for each dependent;

- B. •Elderly and/or disabled family deduction increased to \$525 versus \$400- deduction will adjust based on Consumer Price Index (CPI) for urban wage earners and clerical worker rounded to the next lowest multiple \$25.
- Hardship exemptions:
  - Health and medical care expenses or reasonable attendant care and auxiliary apparatus expenses increased, or
  - Financial hardship is a result of a change in circumstances that would not otherwise trigger an interim reexamination unable to pay rent because of unanticipated medical/disability expenses and families who are no longer eligible for the childcare expense deduction.
  - GHA may extend the hardship exemption for childcare income deduction for additional 90-day periods if the family demonstrates that they are unable to pay their rent because of loss of the childcare expense deduction, and the childcare expense is still necessary even though the family member is no longer employed or furthering his or her education.
- C. THE SUM OF THE FOLLOWING, TO THE EXTENT THE SUM EXCEEDS THREE PERCENT (3%) OF ANNUAL INCOME:
1. Unreimbursed medical expenses of any elderly family or disabled family including any fee paid by the participant for the Medicare Prescription Drug Program; and
  2. Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed, but this allowance may not exceed the earned income received by family members who are 18 years of age or older who are able to work because of such attendant care or auxiliary apparatus.
  3. The Medicare assistance provided for the cost of drugs pursuant to prescription drug discount cards, negotiated drug price, or transitional assistance subsidies. (To be deleted after 5/15/06)
- D. Reasonable child-care expenses for children 12 and younger necessary to enable a member of the family to be employed or to further his or her education. This deduction shall not exceed the amount of employment income that is included in annual income.

### **12.5 RECEIPT OF A LETTER OR NOTICE FROM HUD CONCERNING INCOME**

- A. If a public housing resident receives a letter or notice from HUD concerning the amount or verification of family income, the letter shall be brought to the person responsible for income verification within ten (10) calendar days of receipt by the



- B. The Greensboro Housing Authority shall reconcile any difference between the amount reported by the resident and the amount listed in the HUD communication. This shall be done as promptly as possible.
- C. After the reconciliation is complete, the Greensboro Housing Authority shall, if appropriate, adjust the resident's rent beginning at the start of the next month. If the reconciliation is completed during the final five (5) calendar days of the month and then the new rent shall take effect on the first day of the second month following the end of the current month. In addition, if the resident had not previously reported the proper income, the Greensboro Housing Authority shall do one of the following:
  - 2. Immediately collect the back rent due to the agency;
  - 3. Establish a repayment plan for the resident to pay the sum due to the agency;
  - 4. Terminate the lease and evict for failure to report income; or
  - 5. Terminate the lease, evict for failure to report income, and collect the back rent due to the agency.

## ***12.6 COOPERATIVE WITH LAW ENFORCEMENT AGENCIES***

- A. The Greensboro Housing Authority will comply, on a case-by-case basis, with information requests from Federal, State or local law enforcement officers regarding possible fugitive felons and/or a parole or probation violators. The Greensboro Housing Authority will supply upon legitimate request (1) the current address, (2) Social Security number and (3) photograph (if available) of any recipient of assistance.
- B. The Federal, State or local enforcement officer must submit a request that is (1) written, (2) on law enforcement agency letterhead, and (3) is signed by the requesting officer and his or her immediate supervisor. The request for information must provide the name of the fugitive felon and/or parole or probation violator being sought, and may include other personal information used for identification. The request should also comply with the following requirements:
- C. The law enforcement agency shall notify Greensboro Housing Authority that the fugitive felon and/or parole or probation violator (i) is fleeing to avoid prosecution, custody or confinement after conviction, under the laws of the place from which the individual flees, for a crime, or attempt to commit a crime, which is a felony under the laws of the place from which the individual flees, or which, in the case of the State of New Jersey, is a high misdemeanor; or (ii) is violating a condition of probation or parole imposed under Federal or State law; or (iii) has information that is necessary for the

officer to conduct his/her official duties;

- D. The location or apprehension of the recipient is within the Greensboro Housing Authority's official duties; and,
- E. The request is made in the proper exercise of the law enforcement agency's official duties.

*a. COOPERATIVE WITH WELFARE AGENCIES*

The Greensboro Housing Authority will make its best efforts to enter into cooperation agreements with local welfare agencies under which the welfare agencies will agree:

- B. To target assistance, benefits and services to families receiving assistance in the public housing and HCVP tenant-based assistance program to achieve self-sufficiency; and
- C. To provide written verification to the Greensboro Housing Authority concerning welfare benefits for families applying for or receiving assistance in our housing assistance programs.

### **13.0 VERIFICATION**

The Greensboro Housing Authority will verify information related to waiting list preferences, eligibility, admission, and level of benefits prior to admission. Periodically during occupancy, items related to eligibility and rent determination shall also be reviewed and verified. Income, assets, and expenses will be verified, as well as disability status, need for a live-in aide and other reasonable accommodations; full-time student status of family members 18 years of age and older; Social Security numbers; and citizenship/eligible noncitizen status. Age and relationship will only be verified in those instances where needed to make a determination of level of assistance.

For a family with net assets equal to or less than \$5,000, the Greensboro Housing Authority will accept, for purposes of recertification of income, a family's written declaration that it has net assets equal to or less than \$5,000, without taking additional steps to verify the accuracy of the declaration. The declaration must state the amount of income the family expects to receive from such assets; this amount will be included in the family's income. The Greensboro Housing Authority will obtain third-party verification of all family assets every 3 years.

#### **13.1 ACCEPTABLE METHODS OF VERIFICATION**

Age, relationship, U.S. citizenship, and Social Security numbers will generally be verified with documentation provided by the family. For citizenship, the family's certification will be accepted. (Or, for citizenship, documentation such as listed below will be required.) Verification of these items will include photocopies of the Social Security cards and other documents presented by the family, the INS SAVE approval code, and

forms signed by the family.

Other information will be verified by the following verification methods acceptable to HUD, in the order of preference indicated:

**1. Up-front Income Verifications (UIV)**

UIV is the verification of income through an independent source that systematically maintains income information in computerized form for a large number of individuals.

Current UIV resources include the following:

- a. Enterprise Income Verification (EIV)** – The EIV System is a web-based application, which provides PHAs with employment, wage, unemployment compensation and social security benefit information of tenants who participate in the Public Housing and various Section 8 programs under the jurisdiction of the Office of Public and Indian Housing (PIH). Information in EIV is derived from computer matching programs initiated by HUD with the Social Security Administration (SSA) and the U.S. Department of Health and Human Services (HHS), for all program participants with valid personal identifying information (name, date of birth (DOB), and social security number (SSN)) reported on the form HUD-50058. Use of the EIV system in its entirety is mandatory for all annual and interim re-examinations. The Greensboro Housing Authority will generate all mandatory EIV reports as required. Whether or not an admission is homeless will be noted in the 50058.
- b. State Wage Information Collection Agencies (SWICAs)**
- c. State systems for the Temporary Assistance for Needy Families (TANF) program**
- d. Credit Bureau Information (CBA) credit reports**
- e. Internal Revenue Service (IRS) Letter 1722**
- f. Private sector databases (e.g. The Work Number)**

The Greensboro Housing Authority will use additional UIV resources as they become available. This will be done before, during and/or after examinations and/or re-examinations of household income as appropriate.

It is important to note that UIV data will only be used to verify a participant's eligibility for participation in a rental assistance program and to determine the

level of assistance the participant is entitled to receive and only by properly trained

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persons whose duties require access to this information. Any other use, unless approved by the HUD Headquarters UIV Security System Administrator, is specifically prohibited and will not occur.

No adverse action can be taken against a participant until the Greensboro Housing Authority has independently verified the UIV information and the participant has been granted an opportunity to contest any adverse findings through the established grievance procedure. The consequences of adverse findings may include the Greensboro Housing Authority requiring the immediate payment of any over-subsidy, the entering into a repayment agreement, eviction, criminal prosecution, or any other appropriate remedy.

Furthermore, the information the Greensboro Housing Authority derives from the UIV system will be protected to ensure that it is utilized solely for official purposes and not disclosed in any way that would violate the privacy of the affected individuals.

The EIV Income Report must remain in the tenant file for the duration of tenancy and no longer than three years. The Greensboro Housing Authority is required to maintain at a minimum, the last three years of the form HUD-50058, and supporting documentation for all annual and interim reexaminations of family income. All records are to be maintained for a period of at least three years from the effective date of the action. Once the data has served its purpose, it shall be destroyed by either burning or shredding the data.

### **2. Third-Party Written Verifications**

An original or authentic document generated by a third-party source dated either within the 60-day period preceding the reexamination or the Greensboro Housing Authority request date. Such documentation may be in the possession of the tenant (or applicant), and is commonly referred to as tenant-provided documents. It is the HUD's position that such tenant-provided documents are written third-party verification since these documents originated from a third-party source. The Greensboro Housing Authority may, at its discretion, reject any tenant-provided documents and follow up directly with the source to obtain necessary verification of information.

Examples of acceptable tenant-provided documentation (generated by a third-party source) include, but are not limited to: pay stubs, payroll summary report, employer notice/letter of hire/termination, SSA benefit verification letter, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices. Current acceptable tenant-provided documents may be used for income and rent determinations.

The Greensboro Housing Authority will obtain at least two current and consecutive pay stubs for determining annual income from wages. For new income sources or when two pay stubs are not available, the Greensboro Housing

Authority will project income based on the information from a traditional written third-party verification form or the best available information.

**Note:** Documents older than 60 days (from the Greensboro Housing Authority interview/determination or request date) is acceptable for confirming effective dates of income.

Third-party written verifications may also be used to supplement Up-front Income Verifications. They will be utilized when there is a discrepancy of \$200 a month or more and the participant disputes the UIV results.

**Note:** Social Security benefit information in EIV is updated every three months. If the tenant agrees with the EIV-reported benefit information, PHAs do not need to obtain or request a benefit verification letter from the tenant.

### **3. Written Third-Party Verification Form**

Also known as traditional third-party verification, a standardized form to collect information from a third-party source is distributed by GHA. The form is completed by the third-party by hand (in writing or typeset) when sent the form by the Greensboro Housing Authority.

HUD recognizes that third-party verification request forms sent to third-party sources often are not returned. In other instances, the person who completes the verification form may provide incomplete information; or some tenants may collude with the third-party source to provide false information; or the tenant intercepts the form and provides false information.

HUD requires GHA to rely on documents that originate from a third-party source's computerized system and/or database, as this process reduces the likelihood of incorrect or falsified information being provided on the third-party verification request form. The use of acceptable tenant-provided documents, which originate from a third-party source, will improve the integrity of information used to determine a family's income and rent and ultimately reduce improper subsidy payments. This verification process will also streamline the income verification process.

The Greensboro Housing Authority will allow thirty (30) calendar days for the return of third-party written verifications prior to continuing on to the next type of verification.

**4. Third-Party Oral Verifications**

This type of verification includes direct contact with the source, in person or by telephone. When this method is used, staff members will be required to document in writing with whom they spoke, the date of the conversation, the telephone number, and the facts obtained.

The Greensboro Housing Authority will allow thirty (30) calendar days for the return of third-party oral verifications prior to continuing on to the next type of verification.

**5. Review of Documents**

When UIV, written and oral third-party verifications are not available within the thirty (30) calendar-day period allowed in paragraphs 3 and 4 above, the Housing Authority will use the information received by the family, provided that the documents provide complete information. Photocopies of the documents, excluding government checks, provided by the family will be maintained in the file. In cases in which documents are viewed and cannot be photocopied, staff reviewing the documents will complete a written statement as to the contents of the document(s).

**6. Self-Certification and Self-Declaration**

When UIV, written and oral third-party verifications are not available within the thirty (30) calendar days period allowed in paragraphs 3 and 4 above, and hand-carried verification cannot be obtained, GHA will accept a statement detailing information needed, signed by the head, spouse, co-head, or other adult family member.

Verification forms and reports received will be contained in the applicant/tenant file. Oral third-party documentation will include the same information as if the documentation had been written, i.e. name, date of contact, amount received, etc.

When any verification method other than Up-Front Income Verification is utilized, the Greensboro Housing Authority will document the reason for the choice of the verification methodology in the applicant/resident's file.

<b>Level</b>	<b>Verification Technique</b>	<b>Ranking</b>
<b>6</b>	<b>Upfront Income Verification (UIV)</b> using HUD's Enterprise Income Verification (EIV) system (not available for income verifications of applicants)	<b>Highest</b> (Mandatory)
<b>5</b>	<b>Upfront Income Verification (UIV)</b> using non-HUD system	<b>Highest</b> (Optional)
<b>4</b>	<b>Written Third-Party Verification</b>	<b>High</b> (Mandatory to supplement EIV-reported income sources and when EIV has no data; Mandatory for non-EIV reported income sources; Mandatory when tenant disputes EIV-reported employment and income information <b>and</b> is unable to provide acceptable documentation to support dispute)
<b>3</b>	<b>Written Third-Party Verification Form</b>	<b>Medium-Low</b> (Mandatory if written third-party verification documents are not available or rejected by the PHA; and when the applicant or tenant is unable to provide acceptable documentation)
<b>2</b>	<b>Oral Third-Party Verification</b>	<b>Low</b> (Mandatory if written third-party verification is not available)
<b>1</b>	<b>Tenant Declaration</b>	<b>Low</b> (Use as a last resort when unable to obtain any type of third-party verification)

### ***13.2 VERIFICATION OF CITIZENSHIP OR ELIGIBLE NONCITIZEN STATUS***

The citizenship/eligible non-citizen status of each family member regardless of age must be determined.

Prior to being admitted, or at the first reexamination, all citizens and nationals will be required to sign a declaration under penalty of perjury. They will be required to show proof of their status by such means as a birth certificate, military ID, or military DD 214 Form.

Prior to being admitted or at the first reexamination, all eligible noncitizens who are 62 years of age or older will be required to sign a declaration under penalty of perjury. They will also be required to show proof of age.

Prior to being admitted or at the first reexamination, all eligible noncitizens must sign a declaration of their status and a verification consent form and provide their original USCIS documentation. The Greensboro Housing Authority will make a copy of the individual's USCIS documentation and place the copy in the file. The Greensboro Housing Authority will also verify their status through the USCIS SAVE system. If the USCIS SAVE system cannot confirm eligibility, the Greensboro Housing Authority will mail information to the USCIS in order that a manual check can be made of USCIS records.

Family members who do not claim to be citizens, nationals, or eligible noncitizens must be listed on a statement of noneligible members and the list must be signed by the head of the household.

Noncitizen students on student visas, though in the country legally, are not eligible to be admitted to public housing. If they are members of families that include citizens, the rent must be pro-rated.

Any family member who does not choose to declare their status must be listed on the statement of noneligible members.

If no family member is determined to be eligible under this section, the family's eligibility will be denied.

The family's assistance will not be denied, delayed, reduced, or terminated because of a delay in the process of determining eligible status under this section, except to the extent that the delay is caused by the family.

If the Greensboro Housing Authority determines that a family member has knowingly permitted an ineligible noncitizen (other than any ineligible noncitizens listed on the lease) to permanently reside in their public housing unit, the family will be evicted. Such family will not be eligible to be readmitted to public housing for a period of three (3) years from the date of eviction or termination.

### **13.3 VERIFICATION OF SOCIAL SECURITY NUMBERS**

Prior to admission, each family member who has a Social Security number and who is at least 6 years of age must provide verification of their Social Security number. New family members at least 6 years of age must provide this verification prior to being added to the lease. Children in assisted households must provide this verification at the first regular reexamination after turning six.



If a member of a tenant family indicates they have a Social Security number, but cannot readily verify it, they shall be asked to certify to this fact and shall have up to sixty (60) calendar days to provide the verification. If the individual is at least 62 years of age, they will be given one hundred and twenty (120) calendar days to provide the verification. If the individual fails to provide the verification within the time allowed, the family will be evicted.

#### **13.4 TIMING OF VERIFICATION**

Verification information must be dated within ninety (90) calendar days of certification or reexamination. If the verification is older than this, the source will be contacted and asked to provide information regarding any changes.

When an interim reexamination is conducted, GHA will verify and update all information related to family circumstances and level of assistance. (Or, GHA will only verify and update those elements reported to have changed).

Prior to admission, every family member regardless of age must provide the Greensboro Housing Authority with a complete and accurate Social Security Number unless they do not contend eligible immigration status. New family members must provide this verification prior to being added to the lease. If the new family member is under the age of six and has not been assigned a Social Security Number, the family shall have ninety (90) calendar days after starting to receive the assistance to provide a complete and accurate Social Security Number. The Greensboro Housing Authority may grant one ninety (90) day extension if in its sole discretion and it determines that the person's failure to comply was due to circumstances that could not have reasonably been foreseen and was outside the control of the person.

If a person is already a program participant and has not disclosed his or her Social Security Number, it must be disclosed at the next re-examination or re-certification. This exemption continues even if the individual moves to a new assisted unit.

Participants aged 62 or older as of January 31, 2010 whose initial eligibility determination was begun before January 31, 2010 are exempt from the required disclosure of their Social Security Number. This exemption continues even if the individual moves to a new assisted unit.

The best verification of the Social Security Number is the original Social Security card. If the card is not available, the Greensboro Housing Authority will accept an original document issued by a federal or state government agency, which contains the name of the

individual and the Social Security Number of the individual, along with other identifying information of the individual or such other evidence of the Social Security Number as HUD may prescribe in administrative instructions.

If a member of an applicant family indicates they have a Social Security Number, but cannot readily verify it, the family cannot be assisted until verification is provided. If the Social Security Number of each household member cannot be provided to GHA within 90 days of it being requested, the family shall be removed from the waiting list. During these 90 days, if all household members have not disclosed their SSN at the time a unit becomes available, GHA must offer the available unit to the next eligible applicant family on the waiting list.

If an individual fails to provide the verification within the time allowed, the family will be denied assistance or will have their assistance terminated. The Greensboro Housing Authority may grant one ninety (90) day extension from termination if in its sole discretion it determines that the person's failure to comply was due to circumstances that could not have reasonably been foreseen and there is a reasonable likelihood that the person will be able to disclose a Social Security Number by the deadline.

### **13.5 FREQUENCY OF OBTAINING VERIFICATION**

Household composition will be verified annually. The frequency that household income will be verified depends on the type of rent method chosen by the family.

For each family member, citizenship/eligible noncitizen status will be verified only once unless the family member is an eligible immigrant in a transition stage of admission. In this situation, their status must be updated until they are admitted for permanent residency. This verification will be obtained prior to admission. If the status of any family member was not determined prior to admission, verification of their status will be obtained at the next regular reexamination. Prior to a new member joining the family, their citizenship/eligible noncitizen status will be verified.

For each family member, verification of Social Security number will be obtained only once. This verification will be accomplished prior to admission. When a family member who did not have a Social Security number at admission receives a Social Security number, that number will be verified at the next regular reexamination.

### **13.6 VERIFICATION OF ABSENT FAMILY MEMBER**

If an adult member who was formerly a member of the household is reported permanently absent by the family, the Greensboro Housing Authority will consider any

of the following as verification:

- A. Documentation verifying husband and wife are legally divorced.
- B. Documentation verifying husband and wife are legally separated.
- C. Order of protection/restraining order obtained by one family member against another.
- D. Proof of another home address, which is limited to utility bills, bank statements, and/or driver's license/state identification card.
- E. Statement from the Department of Social Services verifying absence from the household.
- F. If the adult member is incarcerated, a document from the Court or prison should be obtained stating how long they will be incarcerated.

### **13.7 VERIFICATION OF GUARDIANSHIP**

The following documents will be required to determine verification of guardianship:

- A. Documentation of Court-ordered assignment.
- B. Verification from social services agency.
- C. School records.

### **13.8 SPECIAL VERIFICATION FOR ADULT STUDENTS**

In addition to other verification procedures, student head of households must provide a written signed certification that the student does or does not receive any financial support from his or her parents or guardians and whether or not the student is receiving an athletic scholarship. If support is received, the certification must state the amount of the anticipated support. The Greensboro Housing Authority shall verify that amount by using normal third party verification procedures communicating directly with the supporting person(s). If an athletic scholarship is involved, the Greensboro Housing Authority shall determine if any of the scholarship is available for housing costs.

### **13.9 VERIFICATION FOR DISABILITY STATUS**

Greensboro Housing Authority is entitled to obtain information that is necessary to evaluate if a requested reasonable accommodation may be necessary because of a disability.

- A. If a person's disability is obvious, or otherwise known to the provider, and if the need for the requested accommodation is also readily apparent or known, Greensboro Housing Authority will not request any additional information.
- B. If the requestor's disability is obvious, but the need for the accommodation is not readily apparent or known, Greensboro Housing Authority may request information that is necessary to evaluate the disability related need for the accommodation.
- C. If the requestor's disability is not obvious, Greensboro Housing Authority may request reliable disability-related information that (1) is necessary to verify that the person meets the Fair Housing Act's definition of disability (i.e. has a physical or mental impairment that substantially limits one or more major life activities), (2) describes the needed accommodation, and (3) shows the relationship between the person's disability and the need for the requested information.

### **13.10 VERIFICATION OF LIVE-IN AIDES**

GHA will only approve one additional bedroom for a live-in aide and no additional bedrooms will be provided for the family members of the live-in aide. GHA will ensure that housing quality standards (HQS) will not be violated and that there will be no more than two people per bedroom or living/sleeping space in the unit in accordance with 24 CFR § 982.401(d)(2)(ii). If the approval of additional family members of a live-in aide would result in the violation of HQS, the additional family members of the live-in aide will not be approved.

### **13.11 INCOME DISCREPANCY REPORT**

An EIV Income Report shall be pulled from the system before annual or interim reexamination are conducted for any family and compared with family-reported information. If the EIV report reveals an income source that was not reported by the tenant or a substantial difference (defined as \$2400 or more annually) in the reported income information, the Greensboro Housing Authority will:

- A. Discuss the income discrepancy with the tenant; and
- B. Request the tenant to provide any documentation to confirm or dispute the unreported or underreported income and/ or income sources; and
- C. In the event the tenant is unable to provide acceptable documentation to resolve the income discrepancy, GHA will request from the third-party source, any information

necessary to resolve the income discrepancy; and

- D. If applicable, determine the tenant's underpayment of rent as a result of unreported or underreported income, retroactively\*; and
- E. Take any other appropriate action.

\*The Greensboro Housing Authority will determine the retroactive rent as far back as the existence of complete file documentation (form HUD-50058 and supporting documentation) to support such retroactive rent determinations.

The tenant will be provided an opportunity to contest the Greensboro Housing Authority's determination of tenant rent underpayment. Tenants will be promptly notified in writing of any adverse findings made on the basis of the information verified through the aforementioned income discrepancy resolution process. The tenant may contest the findings in accordance with established grievance procedures. The Greensboro Housing Authority will not terminate, deny, suspend, or reduce the family's assistance until the expiration of any notice or grievance period.

When there is an unsubstantial or no disparity between tenant-reported and EIV-reported income information, GHA will obtain from the tenant, any necessary documentation to complete the income determination process. As noted previously, the Greensboro Housing Authority may reject any tenant-provided documentation, if GHA deems the documentation unacceptable. Documentation provided by the tenant will only be rejected for only the following reasons:

- A. The document is not an original; or
- B. The original document has been altered, mutilated, or is not legible; or
- C. The document appears to be a forged document (i.e. does not appear to be authentic).

GHA will explain to the tenant, the reason(s) the submitted documents are not acceptable and request the tenant to provide additional documentation. If at any time, the tenant is unable to provide acceptable documentation that the GHA deems necessary to complete the income determination process, the Authority will submit a traditional third-party verification form to the third-party source for completion and submission to the Greensboro Housing Authority.

If the third-party source does not respond to the Greensboro Housing Authority's request for information, the Authority is required to document the tenant file of its attempt to obtain third-party verification and that no response to the third-party verification request was received.

GHA will then pursue lower level verifications in accordance with the verification hierarchy.

**13.12 THE EIV'S DECEASED TENANTS REPORT**

GHA shall generate the EIV's Deceased Tenants Report monthly shortly before either the end of the month or creating rent statements to see if the system flags deceased residents. GHA shall review the report and follow up with any listed families immediately and take any necessary corrective action as set forth in PIH Notice 2010-9 or successor publications.

In the event that a household member is misidentified as deceased on the Deceased Tenants Report, GHA will notify the individual in writing and advise the individual to contact SSA so that SSA may correct its records.

**13.13 STREAMLINED INCOME DETERMINATION**

The Greensboro Housing Authority has decided that any family member with a fixed source of income that constitutes 90% or more of his or her income may have his or her income determined for annual reexaminations using a streamlined income determination unless the family requests a third-part verification. A streamlined income determination will be conducted by applying, for each fixed-income source, the verified cost of living adjustment (COLA) (if there has been one announced for that year) or current rate of interest to the previously verified or adjusted income amount.

"Family member with a fixed source of income" is defined as a family member whose income includes periodic payments at reasonably predictable levels from one or more of the following sources:

- A Social Security, Supplemental Security Income, Supplemental Disability Insurance;
- B Federal, state, local, or private pension plans;
- C Annuities or other retirement benefit programs, insurance policies, disability or death benefits, or other similar types of periodic receipts; or
- D Any other source of income subject to adjustment by a verifiable COLA or current rate of interest and determined appropriate by the Greensboro Housing Authority.

In the initial year, the Greensboro Housing Authority determines if any of the family member's sources of income are fixed. This determination shall be made by either:

1. comparing the amount of income from the fixed source(s) as indicated on the current year's EIV report or on a family provided document, to the amount generated during the prior year;
2. or by asking the resident.

If so determined, this shall be noted in the tenant file and the file shall state that this was determined. This shall be repeated for new sources of income reported by the resident to the Greensboro Housing Authority.

The Greensboro Housing Authority will use a COLA (if there has been one announced that year) or current rate of interest specific to the fixed source of income in order to adjust the income amount. The Greensboro Housing Authority will verify the appropriate COLA or current rate of interest from a public source or through tenant-provided, third party-generated documentation. If no such verification is available, then the Greensboro Housing Authority will obtain third-party verification of income amounts in order to calculate the change in income for the source.

For any family member whose income is determined pursuant to a streamlined income determination, the Greensboro Housing Authority will obtain third-party verification of all income amounts every 3 years. This also means that if a family member with a fixed-income source that constitutes 90% or more is added to the family during year two, for example, then the Housing Authority must obtain third-party verification of all income amounts for that family member at the next reexamination if the Housing Authority wishes to have all family members with fixed incomes on the same schedule with respect to streamlined annual reexaminations.

The Greensboro Housing Authority will continue to **annually** conduct third-party verification of non-fixed sources of income (wages, salaries, etc.) and deductions (medical, etc.) where applicable for all family members. Also, the Greensboro Housing Authority will continue to obtain family member signatures on the consent forms required by 24 CFR 5.230, as if this provision had not been adopted.

## **14.0 DETERMINATION OF TOTAL RESIDENT PAYMENT AND RESIDENT RENT**

### **14.1 THE INCOME-BASED METHOD**

The total resident payment is equal to the highest of:

- A. 10% of the family's monthly income;
- B. 30% of the family's adjusted monthly income; or
- C. The minimum rent of \$50.

### **14.2 FAMILY CHOICE**

At admission and each year in preparation for their annual reexamination, each family is given the choice of having their rent determined under the income-based method or having their rent set at the flat rent amount.

- A. Families who opt for the flat rent will be required to undergo the income

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reexamination process only every three years. Their family composition must be reviewed annually.

- B. Families who opt for the flat rent may request to have a reexamination and return to the income based method at any time for any of the following reasons:
  - 1. The family's income has decreased.
  - 2. The family's circumstances have changed increasing their expenses for child-care, medical care, etc.
  - 3. Other circumstances creating a hardship on the family such that the income method would be more financially feasible for the family.
- C. Families have only one choice per year except for financial hardship cases. In order for families to make informed choices about their rent options, the Greensboro will provide them with the following information whenever they have to make rent decisions:
  - 1. The Greensboro Housing Authority's policies on switching types of rent in case of a financial hardship; and
  - 2. The dollar amount of tenant rent for the family under each option. If the family chose a flat rent for the previous year, the Greensboro Housing Authority will provide the amount of income-based rent for the subsequent year only the year the Greensboro Housing Authority conducts an income reexamination or if the family specifically requests it and submits updated income information

### 14.3 *MINIMUM RENT*

The Greensboro Housing Authority has set the minimum rent at \$50. If the family requests a hardship exemption, however, the Greensboro Housing Authority will suspend the minimum rent beginning the month following the family's request until the

Housing Authority can determine whether the hardship exists and whether the hardship is of a temporary or long-term nature.

- A. A hardship exists in the following circumstances:
  - 1. When the family has lost eligibility for or is waiting an eligibility determination for a Federal, State, or local assistance program including a family that includes a member who is a non-citizen 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;



2. When the family would be evicted because it is unable to pay the minimum rent;
  3. When the income of the family has decreased because of changed circumstances, including loss of employment; and
  4. When a death has occurred in the family.
- B. No hardship. If the Housing Authority determines there is no qualifying hardship, the minimum rent will be reinstated, including requiring back payment of minimum rent for the time of suspension.
- C. Temporary hardship. If the Housing Authority reasonably determines that there is a qualifying hardship but that it is of a temporary nature, the minimum rent will be not be imposed for a period of 90 calendar days from the beginning of the suspension of the minimum rent. At the end of the 90-day period, the minimum rent will be imposed retroactively to the time of suspension. The Housing Authority will offer a repayment agreement in accordance with Section 19 of this policy for any rent not paid during the period of suspension. During the suspension period the Housing Authority will not evict the family for nonpayment of the amount of resident rent owed for the suspension period.
- D. Long-term hardship. If the Housing Authority determines there is a long-term hardship, the family will be exempt from the minimum rent requirement until the hardship no longer exists.
- E. Appeals. The family may use the grievance procedure to appeal the Housing Authority's determination regarding the hardship. No escrow deposit will be required in order to access the grievance procedure.

#### **14.4 THE FLAT RENT**

The Greensboro Housing Authority has set a flat rent for each public housing unit. The flat rent is determined annually, based on the market rental value of the unit using one of the following three options:

- A. Option One: The Greensboro Housing Authority will establish a flat rent for each public housing unit that is no less than 80 percent of the applicable Fair Market Rent (FMR) as determined under 24 CFR part 888, subpart A;
- B. Option Two: No less than 80 percent of an applicable small area FMR (SAFMR) or adjusted rent if applicable, as determined by HUD, or any successor determination, that more accurately reflects local market conditions and is based on an applicable market area that is geographically smaller than the applicable market area used in the first paragraph of the section, If HUD has not determined

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an applicable SAFMR or unadjusted rent. The Greensboro Housing Authority will rely on the applicable FMR under the first option or may apply for an exception flat rent under the three options. No other smaller geographical FMRs will be allowed by HUD;

- C. Option Three; The Greensboro Housing Authority may request, and HUD may approve, on a case-by-case basis, a flat rent that is lower than the amounts in Options One or Two of this section, subject to the following requirements:
1. The Greensboro Housing Authority must submit a market analysis of the applicable market.
  2. The Greensboro Housing Authority must demonstrate, based on the market analysis, that the proposed flat rent is a reasonable rent in comparison to rent for other comparable unassisted units, based on the location, quality, size, unit type, and age of the public housing unit and any amenities, housing services, maintenance and utilities to be provided by the PHA in accordance with the lease.
  3. All requests for exception flat rents under this option must be submitted to HUD.

The Greensboro Housing Authority will not implement Option Three prior to receiving HUD's written approval. A new market analysis and a new HUD written approval are required every year.

The option chosen to establish the required flat rent will be the sole decision of the Greensboro Housing Authority.

There is no utility allowance for families paying a flat rent because the Greensboro Housing Authority has already factored who pays for the utilities into the flat rent calculation. If the resident pays their own utilities, the flat rent shall be reduced by a reasonable utility allowance based on an energy-conservation household of modest circumstances.

Annually, no later than 90 days after issuance of new FMRs or SAFMRs by HUD, the Greensboro Housing Authority will compare the current flat rent amount to the applicable FMR and SAFMR/unadjusted rent, If the flat rent is at least 80 percent of the lower of the FMR or SAFMR/adjusted rent, then Greensboro Housing Authority is in compliance with the law, and no further steps are necessary. If the flat rent is less than 80 percent of the lower of the FMR and SAFMR, the Greensboro Housing Authority will adjust the flat rents at no less than 80 percent of the lower of the FMR or SAFMR/unadjusted rent subject to the utilities adjustment required for tenant-paid utilities, or the Greensboro Housing may request an exception flat rent pursuant to Option Three, as described above.

Revised flat rent will become effective for all families admitted after the flat rent is changed or at the lease renewal for an existing resident.

As for flat rent phase-ins, previous regulations in PIH Notice 2014-12 and the subsequent FAQ's. HUD provided flexibility to PHAs to phase in all rent increases over a three-year period, including those increases that were 35 percent or less.

However, the FY 2015 Appropriations Act provides the Greensboro Housing Authority additional flexibility to establish flat rents at lower amounts, thereby eliminating the need for the three-year phase-in of the flat rent increases that are 35 percent or less. **Therefore, only flat rent increases that will be phased-in are those where a family's rent will increase by more than 35 percent.**

Agencies that began phase-ins for families with rent increase at 35 percent or less last year shall follow the action outlined below at the family's next annual rent option:

- 1) On a case-by-case basis, at the family's next annual rent option, compare the update flat rent amount applicable to the unit to the rent that was being paid by the family immediately prior to the annual rent option;
  - a. If the update flat rent amount would not increase a family's rental payment by more than 35 percent, the family may choose to pay either the updated flat rent amount or the previously calculated income-based rent;
  - b. If the agency determines that the updated flat rent amount would increase a household's rental payment by more than 35 percent. The family may choose to pay the phased-in flat rent amount resulting from the flat rent impact analysis or the previously calculated income-based rent.

Affected families will be given a 30-day notice of any rent change. Adjustments are applied at the end of the annual lease (for more information on flat rents, see Section 16.3).

The Greensboro Housing Authority will post the flat rents at each of the developments and at the central office. Flat rents are incorporated in this policy upon approval by the Board of Commissioners.

#### **14.5 RENT FOR FAMILIES UNDER THE NONCITIZENRULE**

A mixed family will receive full continuation of assistance if all of the following conditions are met:

- A. The family was receiving assistance on June 19, 1995;
- B. The family was granted continuation of assistance before November 29, 1996;
- C. The family's head or spouse has eligible immigration status; and
- D. The family does not include any person who does not have eligible status other than the

head of household, the spouse of the head of household, any parent of the head or spouse, or any child (under the age of 18) of the head or spouse.

The family's assistance is prorated in the following manner:

- A. Step 1. Determine the total tenant payment in accordance with 24 CFR §5.628. (Annual income includes income of all family members, including any family member who has not established eligible immigration status.)
- B. Step 2. Family maximum rent is equal to the applicable flat rent for the unit size to be occupied by the family.
- C. Step 3. Subtract the total tenant payment from the family maximum rent. The result is the maximum subsidy for which the family could qualify if all members were eligible ("family maximum subsidy").
- D. Step 4. Divide the family maximum subsidy by the number of persons in the family (all persons) to determine the maximum subsidy per each family member who has citizenship or eligible immigration status ("eligible family member"). The subsidy per eligible family member is the "member maximum subsidy."
- E. Step 5. Multiply the member maximum subsidy by the number of family members who have citizenship or eligible immigration status ("eligible family members"). The product of this calculation is the "eligible subsidy."
- F. Step 6. The mixed family TTP is the maximum rent minus the amount of the eligible subsidy.
- G. Step 7. Subtract any applicable utility allowance from the mixed family TTP. The result of this calculation is the mixed family tenant rent.

#### **14.6 UTILITY ALLOWANCE**

The Greensboro Housing Authority has established utility allowances for all units. The allowance will be based on a reasonable consumption of utilities by an energy- conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful environment. In setting the allowance, the Greensboro Housing Authority will review the actual consumption of tenant families as well as changes made or anticipated due to modernization (weatherization efforts, installation of energy-efficient appliances, etc.). Allowances will be evaluated at least annually as well as any time utility rate changes by 10% or more since the last revision to the allowances. Allowance will be adjusted at the earlier of the first interim or annual reexamination following the effective date of the allowance revision.

With the exception of Gateway Plaza and Hall Towers, electric and gas are paid by the residents directly to the utility company. The utility allowance will be subtracted from the family's formula or flat rent to determine the amount of the Tenant Rent. The Tenant Rent is the amount the family owes each month to the Greensboro Housing Authority. The

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amount of the utility allowance is then still available to the family to pay the cost of their utilities. Any utility cost above the allowance is the responsibility of the resident. Any savings resulting from utility costs below the amount of the allowance belongs to the resident.

In Hall Towers and Gateway Plaza utilities furnished by Greensboro Housing Authority are included in the Tenant Rent.

Utility allowance revisions based on rate changes shall be effective retroactively to the first day of the month following the month in which the last rate change took place.

Families with high utility costs are encouraged to contact the Greensboro Housing Authority for an energy analysis. The analysis may identify problems with the dwelling unit that once corrected will reduce energy costs. The analysis can also assist the family in identifying ways they can reduce their costs.

### **14.7 PAYING RENT**

Rent and other charges are due and payable on the first day of the month. No cash shall be accepted as a rent payment or for the collection of rent related items (late payments, security deposits, revolving loan repayments, etc.). However, cash will be accepted as rent payment at specific locations designated to accept rent payments on behalf of the Greensboro Housing Authority. Payments for rent can also be paid online via E-Bill Express at [www.gha-nc.org](http://www.gha-nc.org).

If the rent is not paid by the fifth of the month, a Notice to Vacate will be issued to the resident. In addition, a \$15 late charge will be assessed to the resident. Late payment of rent resulting in the initiation of eviction proceedings three times in a twelve-month period will result in a termination of the lease. If rent is paid by a personal check and the check is returned for insufficient funds, this shall be considered a non-payment of rent and will incur the late charge plus an additional charge for bank charges and/or fees.

## **15.0 CONTINUED OCCUPANCY AND COMMUNITY SERVICE**

### **15.1 GENERAL**

In order to be eligible for continued occupancy, each adult family member must either (1) contribute eight hours per month of community service (not including political activities), or (2) participate in an economic self-sufficiency program or (3) perform eight hours per month of combined activities as previously described unless they are exempt from this requirement. Failure to comply with the community service requirement may result in ineligibility for continued occupancy at the time of any subsequent annual reexamination. The eight hours of activity may be completed at 8 hours each month or aggregated across a year, as long as 96 hours are completed by each annual certification.

The following adult family members of resident families are exempt from this requirement.

- A. Family members who are 62 or older.
  
- B. Family members who are blind or disabled as defined under 216(I)(1) or 1614 of the Social Security Act (42 U.S.C. 416(I)(1) and who certify that because of this disability she or he is unable to comply with the community service requirements.  
or

Family members who are the primary care giver of such individual.

- C. Family members engaged in work activities (at least 15 hours weekly) including:
  - 1. Unsubsidized employment;
  - 2. Subsidized private-sector employment;
  - 3. Subsidized public-sector employment;
  - 4. Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available;
  - 5. On-the-job training;
  - 6. Job search;
  - 7. Community service programs;
  - 8. Vocational educational training (not to exceed 12 months with respect to an individual);
  - 9. Job-skills training directly related to employment;
  - 10. Education directly related to employment in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency;
  - 11. Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate.
  
- D. Family members who are exempt from work activity under part A title IV of the Social Security Act or under any other State welfare program, including the welfare-to-work program: or.

- E. Family members receiving assistance, benefits or services under a State program funded under part A title IV of the Social Security Act or under any other State welfare program (HUD has determined that the Supplemental Nutrition Assistance Program (SNAP) qualifies as a welfare program), including welfare- to-work and who are in compliance with that program.

### ***15.3 NOTIFICATION OF THEREQUIREMENTS***

The Greensboro Housing Authority shall identify all adult family members who are apparently not exempt from community service requirement.

The Greensboro Housing Authority shall notify all such family members of the community service requirement and of the categories of individuals who are exempt from the requirement. The notification will provide the opportunity for family members to claim and explain an exempt status in writing. The Greensboro Housing Authority shall verify such claims. If a resident does not agree with the Greensboro Housing Authority's determination, he or she can appeal by following the Grievance Policy. Changes in the exempt and non-exempt status of a resident shall be reported by the resident to the Greensboro Housing Authority within ten (10) calendar days of the change.

At lease execution or re-examination, all adult members (18 or older) of a public housing resident family must:

- A. Provide all requested documentation, if applicable, that they qualify for an exemption: (Documentation provided by the tenant will be used (and verified if necessary) by the Greensboro Housing Authority to determine whether the tenant is exempt from the CSSR), and
- B. Sign a certification that they have received and read the policy and understand that, if they are not exempt, failure to comply with the community service requirement will result in non-renewal of their lease per 24 CFR 966.4(1)(2)(iii)(D).

When a non-exempt person becomes exempt, it is his or her responsibility to report to the Greensboro Housing Authority and provide documentation. When an exempt person becomes non-exempt, it is his or her responsibility to report this to the Greensboro Housing Authority as soon as possible.

For families paying a flat rent, the obligation begins on the date their annual reexamination would have been effective had an annual reexamination taken place.

It will also advise them that failure to comply with the community service requirement will result in ineligibility for continued occupancy at the time of any subsequent annual reexamination.

Eligible community service activities include, but are not limited to, serving at:

- A. Local public or non-profit institution, such as schools, Head Start Programs, before-or after-school programs, childcare centers, hospitals, clinics, hospices, nursing homes, recreation centers, senior centers, adult daycare programs, homeless shelters, feeding programs food banks (distribution either donated or commodity foods), or clothes closets (distributing donated clothing):
- B. Non-profit organization serving Greensboro Housing authority residents or their children. Such as: Boy and Girl Scouts, Boys and Girls club, 4-H Clubs, Police Activities League (PAL), organized children’s recreation, mentoring, or education programs, Big Brothers or Big Sisters, Garden Centers, community clean-up programs, beautification programs:
- C. Programs funded under the Older American Act, such as Green Thumb, Service corps of Retired Executives, senior meals programs, senior centers, Meals on Wheels;
- D. Public or non-profit organizations dedicated to senior, youth, children, residents, citizens, special-needs populations or with missions to enhance the environment, historic resources, cultural identities, neighborhoods or performing arts;
- E. Greensboro Housing Authority housing to improve grounds or provide gardens (so long as such work does not alter the Greensboro Housing Authority’s insurance coverage), or work through resident organizations to help other resident with problems, including serving on the Resident Advisory Board, outreach and assistance with Greensboro Housing-run self-sufficiency activities including supporting computer learning center; and
- F. Care for the children of other residents so parents may volunteer.

Any required court-ordered community service or probation-based work shall not count towards a resident’s required 8 hours per month of community service.

Eligible self-sufficiency activities include, but are not limited, to:

- A. Job readiness or job training while not employed:
- B. Training programs through local One-Stop Career Centers, Workforce Investment Boards (local entities administered through the U. S. Department of Labor), or other training providers;
- C. Higher education (junior college or college);
- D. Apprenticeship (formal or informal);



- E. Substance abuse or mental health counseling;
- F. Reading, financial and/or computer literacy classes;
- G. English as a Second Language and/or English proficiency class;
- H. Budgeting and credit counseling.

The Greensboro Housing Authority will try to coordinate with social services agencies, local schools, and the Human Resources Office in identifying a list of volunteer community service positions.

Together with the resident advisory councils, the Greensboro Housing Authority may create volunteer position such as hall monitoring, litter patrols, and supervising and record keeping for volunteers.

### **15.5 THE PROCESS**

At the first annual reexamination on or after July 1, 2001, and each annual reexamination thereafter, the Greensboro Housing Authority will do the following:

- A. Provide a list of known volunteer opportunities to the family members.
- B. Provide information about obtaining suitable volunteer positions.
- C. Provide a volunteer time sheet to the family member. Instructions for the time sheet will require the resident to complete the form, have a supervisor date and sign for each period of work and return the form to Greensboro Housing Authority.
- D. At least thirty (30) calendar days before the family's next lease anniversary date, the Greensboro Housing Authority will determine whether each applicable adult family member is in compliance with the community service requirement.

At each regular scheduled rent re-examination, each non-exempt family member family members will present a signed certificate on a form provided by the Greensboro Housing Authority of CSSR activities performed over the previous twelve (12) months. The Greensboro Housing Authority will obtain third party verification of CSSR completion administered through outside organization.

### **15.6 NOTIFICATION OF NONCOMPLIANCE WITH COMMUNITY SERVICE REQUIREMENT**

The Greensboro Housing Authority will notify any family found to be in noncompliance of the following:

- A. The family member(s) has been determined to be in noncompliance;

- B. That the determination is subject to the grievance procedure, a right to be represented by counsel, and the opportunity to any available judicial remedy; and
- C. That, unless the family member(s) enter into a written workout agreement, the lease will not be renewed.

### **15.7 OPPORTUNITY FOR CURE**

The Greensboro Housing Authority will offer the family member(s) the opportunity to enter into a work-out agreement prior to the anniversary of the lease. The agreement shall state that the family member(s) agrees to enter into an economic self-sufficiency program or agrees to contribute to community service for as many hours as needed to comply with the requirement over the past 12-month period. It will state the number of hours that the family member is deficient. The cure shall occur over the 12-month period beginning with the date of the agreement and the resident shall at the same time stay current with that year's community service requirement. The first hours a resident earns go toward the current commitment until the current year's commitment is made.

If any applicable family member does not accept the terms of the agreement, does not fulfill their obligation to participate in an economic self-sufficiency program, or falls behind in their obligation under the agreement to perform community service, Greensboro Housing Authority shall take action to terminate the lease unless the noncompliant family member no longer lives in the unit.

### **15.8 PROHIBITION AGAINST REPLACEMENT OF AGENCY EMPLOYEES**

In implementing the service requirement, the Greensboro Housing Authority may not substitute community service or self-sufficiency activities performed by residents for work ordinarily performed by its employees, or replace a job at any location where residents perform activities to satisfy the service requirement.

### **15.9 OVER-INCOME FAMILIES**

Beginning January 1, 2019, the Greensboro Housing Authority shall track all public housing residents who have an income over 120% of the Area Median Income (AMI). When GHA becomes aware, through an annual reexamination or an interim reexamination for an increase in income, that a family's income exceeds the applicable income limit, GHA must, per HUD regulation, document that the family exceeds the threshold to compare with the family's income a year later.

Families participating in the public housing program must not have incomes that exceed the over-income limit for more than twenty-four consecutive months. Once a family has exceeded the over-income limit for twenty-four (24) consecutive months, the PHA must notify the family in writing and charge such family as monthly rent for the unit occupied by such family an amount equal to the greater of (1) the applicable fair market rent (FMR) for a dwelling unit in the same market area of the same size; or (2) the amount of the monthly subsidy which shall include any amounts from the Operating Fund and Capital

## **16.0 RECERTIFICATIONS**

At least annually, the Greensboro Housing Authority will conduct a reexamination of family income and circumstances. The results of the reexamination determine (1) the rent the family will pay, and (2) whether the family is housed in the correct unit size.

### **16.1 RECERTIFICATION INTERVIEW**

The Greensboro Housing Authority will send a notification letter to the family letting them know that it is time for their annual reexamination, giving them the option of selecting either the flat rent or income method. The opportunity to select the flat rent is available only at this time. During recertification, the Greensboro Housing Authority may assist the family in identifying the rent method that would be most advantageous for the family.

The notification letter GHA sends to the family may or may not include forms for the family to complete in preparation for the interview. During the interview, the family will provide all information regarding income, assets, deductions (eligible expenses), or other information necessary to determine the family's share of rent, and all other information necessary to comply with regulations for federally assisted housing. The family will sign the HUD consent forms that later will be mailed to the sources that will verify the family circumstances.

Also, during the recertification, GHA will also conduct a criminal background check on all family members 15 years of age and older which will include sex offender registry screening... GHA will verify this information using the Dru Sjodin National Sex Offender Database and document this information in the same method used at admission. For any admissions after June 25, 2001 (the effective date of the Screening and Eviction for Drug Abuse and Other Criminal Activity final rule), if the recertification screening reveals that the tenant or a member of the tenant's household is subject to a lifetime sex offender registration requirement, or that the tenant has falsified information or otherwise failed to disclose his or her criminal history on their application and/or recertification forms, the Housing Authority will pursue eviction of the household.

If a family is about to be evicted from housing based on either the criminal check or the sex offender registration program, the applicant will be informed of this fact and given an opportunity to dispute the accuracy of the information before the eviction occurs.

### **16.2 MISSED APPOINTMENTS**

Any family that fails to keep a recertification appointment will be sent a letter announcing commencement of eviction against the family.

- A. Families who opt for the flat rent may request to have a reexamination and return to the income-based method at any time for the following reasons:
  - 1. The family's income has decreased.
  - 2. The family's circumstances have changed increasing their expenses for childcare, medical care, etc.
  - 3. Other circumstances creating a hardship on the family such that the income method would be more financially feasible for the family.

Once a family returns to the income-based method during their "lease year" they cannot go back to a flat rent until their next annual reexamination.

- B. The dates upon which the Greensboro Housing Authority expects to review the amount of the flat rent, the approximate rent increase the family could expect, and the approximate date upon which a future rent increase could become effective.
- C. The name and phone number of an individual to call to get additional information or counseling concerning flat rents.

#### **16.4 THE INCOME BASED METHOD**

During the interview, the family will provide all information regarding income, assets, deductions (eligible expenses), and other information necessary to determine the family's share of rent. The family will sign the HUD consent form and other consent forms that later will be mailed to the sources that will verify the family circumstances.

Upon receipt of verification, the Greensboro Housing Authority will determine the family's annual income and will calculate their rent as follows.

The total tenant payment is equal to the highest of:

- A. 10% of the family's monthly income;
- B. 30% of the family's adjusted monthly income; or
- C. The minimum rent of \$50.

#### **16.5 EFFECTIVE DATE FOR RENT CHANGES FOR ANNUAL REEXAMINATIONS**

The new rent will generally be effective upon the anniversary date with thirty (30) calendar days' notice of any rent increase to the family.

If the rent determination is delayed due to a reason beyond the control of the family, then

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any rent increase will be effective the first of the month after the month in which the family receives a 30-day notice of the amount. If the new rent is a reduction and the delay is beyond the control of the family, the reduction will be effective as scheduled on the anniversary date.

If the family caused the delay, then any increase will be effective on the anniversary date. Any reduction will be effective the first of the month after the rent amount is determined.

### ***16.6 INTERIM REEXAMINATIONS***

During an interim reexamination, only the information affected by the changes being reported will be reviewed and verified. Families are required to report the following changes to the Greensboro Housing Authority between regular reexaminations. If the family's rent is being determined under the income method, these changes will trigger an

interim reexamination. The family shall report these changes within ten (10) calendar days of their occurrence.

- A. A member has been added to the family through birth or adoption or court-awarded custody.
- B. A household member is leaving or has left the family unit.
- C. An increase of income of \$100 per month or above must be reported within 10 days of its occurrence.
- D. The resident must report the receipt of a deferred payment in a lump sum that represents the delayed start of a periodic payment such as unemployment, which could result in an increase in rent.
- E. The resident may report a decrease in income or an increase in allowances or deductions that would result in a decrease in the resident's rent. Decreases in income that are verified to last less than thirty (30) calendar days will not be processed. Failure to report income changes within ten (10) days may result in a retroactive rent increase, but not a retroactive credit or rent reduction. In order to qualify for rent reductions, residents must report income decreases promptly.
- F. After rent has been adjusted downward, the resident must report all changes in Annual Income of at least \$100 per month immediately.

In order to add a household member other than through birth, adoption, or court-awarded custody, the family must request that the new member be added to the lease. Before adding the new member to the lease, the individual must complete an application form stating their income, assets, and all other information required of an applicant. The individual must provide their Social Security number if they have one and must verify their citizenship/eligible immigrant status. (Their housing will not be delayed due to delays in verifying eligible immigrant status other than delays caused by the family.) The new family

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member will go through the screening process similar to the process for applicants. GHA will determine the eligibility of the individual before adding them to the lease. If the individual is found to be ineligible or does not pass the screening criteria, they will be advised in writing and given the opportunity for an informal review. If they are found to be eligible and do pass the screening criteria, their name will be added to the lease. At the same time, if the family's rent is being determined under the income method, the family's annual income will be recalculated taking into account the circumstances of the new family member. The effective date of the new rent will be in accordance with Section 16.8.

A resident requesting a live-in aide will be required to provide verification of the need for a live-in aide. In addition, before approval of the live-in aide, the individual (live-in aide) must complete an application form for purposes of determining citizenship/eligible

immigrant status and the live in aide will go through the screening process similar to the process for applicants. GHA will determine the eligibility of the live-in aide before approval can be granted. If the individual is found to be ineligible or does not pass the screening criteria, the resident will be advised in writing and given the opportunity for an informal review. Under no circumstances will the live-in aide be added to the lease or be considered the last remaining member of a tenant family.

Since the live-in aide would not be living in the subsidized unit except to provide supportive services to the head-of-household, if the head-of-household dies and the only remaining household member is the live- in aide, the live- in aide is not entitled or eligible for any continued occupancy.

GHA will not designate the live-in aide as the new head-of-household for any month after the month in which the head-of-household died. GHA will notify the live- in aide s/he is required to vacate the unit at the end of month.

Families may at any time, request an interim reexamination based on a decrease in income, an increase in allowable expenses, or other changes in family circumstances. Upon such request, the Greensboro Housing Authority will take timely action to process the interim reexamination and recalculate the resident's rent.

### ***16.7 SPECIAL REEXAMINATIONS***

If a family's income is too unstable to project for twelve (12) months, including families that temporarily have no income (0 renters) or have a temporary decrease in income, the Greensboro Housing Authority may schedule special reexaminations every sixty (60) calendar days until the income stabilizes and an annual income can be determined.

### ***16.8 EFFECTIVE DATE OF RENT CHANGES DUE TO INTERIM ORSPECIAL REEXAMINATIONS***

Unless there is a delay in reexamination processing caused by the family, any rent increase will be effective the first of the second month after the month in which the family receives notice of the new rent amount. If the family causes a delay, then the rent increase will be

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effective on the date it would have been effective had the process not been delayed (even if this means a retroactive increase).

If the new rent is a reduction and any delay is beyond the control of the family, the reduction will be effective the first of the month after the interim reexamination should have been completed.

If the new rent is a reduction and the family caused the delay or did not report the change in a timely manner, the change will be effective the first of the month after the rent amount is determined.

### **16.9 HOUSING AUTHORITY MISTAKES IN CALCULATING RENT**

If the Greensboro Housing Authority makes a mistake in calculating a resident's rent contribution and overcharges the resident, the resident shall receive a refund for the amount of the mistake going back a maximum of twenty-four (24) months.

The refund shall be given to the resident as soon as practical or credited to the resident's account, whichever the resident desires unless the resident owes the Housing Authority money in which case the debt shall be offset to the degree possible before the resident chooses between the two refund methods.

## **17.0 UNIT TRANSFERS**

### **17.1 THE TRANSFER POLICY**

Transfers from one GHA owned Public Housing community to another will be considered for the following reasons:

- A. To address emergency situations.
- B. To fully utilize available housing resources while avoiding overcrowding by insuring that each family occupies the appropriate size unit.
- C. To facilitate a relocation when required for modernization or other management purposes.
- D. To facilitate relocation of families with inadequate housing accommodations.
- E. To provide an incentive for families to assist in meeting the Greensboro Housing Authority's deconcentration goal, if appropriate.
- F. To eliminate vacancy loss and other expenses due to unnecessary transfers.
- G. To alleviate verified medical problems.

- H. To permit reasonable accommodation.
- I. To assist residents, lawful occupants, or affiliated individuals who are victims of actual or threatened domestic violence, dating violence, sexual assault, or stalking according to VAWA.

If the transfer is requested under VAWA, the provisions of VAWA shall apply.

### ***17.2 CATEGORIES OR TRANSFERS***

Category A: Emergency transfers. These transfers are necessary when conditions pose an immediate threat to the life, health, or safety of a family or one of its members or where a family member, lawful occupant, or affiliated individual is a victim of actual or threatened domestic violence, dating violence, sexual assault, or stalking to family members or affiliated individuals. Such situations may involve defects of the unit or the building in which it is located, the health condition of a family member, or a hate crime. Other circumstances will be evaluated on a case-by-case basis. All emergency transfers shall be completed as soon as practical.

The Greensboro Housing Authority has a specific VAWA Emergency Transfer Policy that is incorporated by reference into this ACOP and will govern all transfers requested under VAWA.

Category B: Immediate administrative transfers. These transfers are necessary in order to permit a family needing accessible features to move to a unit with such a feature to enable modernization, revitalization, disposition, or demolition work to proceed.

Category C: Regular administrative transfers. These transfers are made to offer incentives to families willing to help meet certain GHA occupancy goals, to correct occupancy standards where the unit size is inappropriate for the size and composition of the family, to allow for non-emergency but medically advisable transfers and other transfers approved by GHA when a transfer is the only or best way of solving a serious problem.

### ***17.3 DOCUMENTATION***

When the transfer is at the request of the family, the family may be required to provide third party verification of the need for a transfer.

When the transfer is a result of an action protected under VAWA, the documentation required under the VAWA Emergency Transfer shall be required.

### ***17.4 COST OF THE FAMILY'S MOVE***

The cost of the transfer generally will be borne by the family in the following circumstances:

- A. When the transfer is made at the request of the family or by others on behalf of the family; (i.e. by the police)



- B. When the transfer is made under VAWA;
- C. When the transfer is needed to move the family to an appropriately sized unit, either larger or smaller;
- D. When the transfer is necessitated because a family with disabilities needs the accessible unit into which the transferring family moved (The family without disabilities signed a statement to this effect prior to accepting the accessible unit); or
- E. When the transfer is needed because action or inaction by the family caused the unit to be unsafe or uninhabitable.

The cost of the transfer will be borne by the Greensboro Housing Authority in the following circumstances:

- A. When the transfer is needed in order to carry out modernization, disposition, or demolition activities; or
- B. When action or inaction by the Greensboro Housing Authority has caused the unit to be unsafe or inhabitable.

The responsibility for moving costs in other circumstances will be determined on a case-by-case basis.

### ***17.5 TENANTS IN GOOD STANDING***

When the transfer is at the request of the family, it will not be approved unless the family is in good standing with GHA or a VAWA victim. This means the family must be in compliance with their lease, current in all payments to the Greensboro Housing Authority, and must pass a housekeeping inspection.

### ***17.6 RIGHT OF THE GREENSBORO HOUSING AUTHORITY IN TRANSFER POLICY***

The provisions listed above are to be used as a guide to ensure fair and impartial means of assigning units for transfers. It is not intended that this policy will create a property right or any other type of right for a tenant to transfer or refuse to transfer.

### ***17.7 TRANSFERS TO NON-GHA OWNED AND MANAGED PUBLIC HOUSING UNITS***

GHA does not control or participate in transfers to non-GHA owned and managed public housing units including the mixed income communities of Parkview, Windhill Apartments, The Villas at Willow Oaks, Windhill Court Apartments, The Havens and Willow Oaks Townhomes.

## **18.0 INSPECTIONS**

The Greensboro Housing Authority will conduct inspections as listed below:

### ***18.1 MOVE-IN INSPECTIONS***

The Greensboro Housing Authority and an adult member of the family will inspect the unit prior to signing the lease. Both parties will sign a written statement of the condition of the unit. A copy of the signed inspection will be given to the family and the original will be placed in the resident file.

### ***18.2 ANNUAL INSPECTIONS***

The Greensboro Housing Authority will inspect each public housing unit annually to ensure that each unit meets the Greensboro Housing Authority's housing standards. Work orders will be submitted and completed to correct any deficiencies.

### ***18.3 PREVENTATIVE MAINTENANCE INSPECTIONS***

This is generally conducted along with the annual inspection. This inspection is intended to keep items in good repair. It checks weatherization; checks the condition of the smoke detectors, water heaters, furnaces, automatic thermostats and water temperatures; checks for leaks; and provides an opportunity to change furnace filters and provide other minor servicing that extends the life of the unit and its equipment.

### ***18.4 SPECIAL INSPECTIONS***

A special inspection may be scheduled to enable HUD or others to inspect a sample of the housing stock maintained by the Greensboro Housing Authority.

### ***18.5 HOUSEKEEPING INSPECTIONS***

Generally, at the time of annual reexamination, or at other times as necessary, the Greensboro Housing Authority will conduct a housekeeping inspection to ensure the family is maintaining the unit in a safe and sanitary condition.

### ***18.6 NOTICE OF INSPECTION***

For inspections defined as annual inspections, preventative maintenance inspections, special inspections, and housekeeping inspections, the Greensboro Housing Authority will give the resident at least two (2) calendar days written notice.

### ***18.7 EMERGENCY INSPECTIONS***

If any employee and/or agent of the Greensboro Housing Authority has reason to believe that an emergency exists within the housing unit, the unit can be entered without notice.

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The person(s) that enters the unit will leave a written notice to the resident that indicates the date and time the unit was entered and the reason why it was necessary to enter the unit.

### **18.8 MOVE-OUT INSPECTIONS**

The Greensboro Housing Authority conducts the move-out inspection after the resident vacates to assess the condition of the unit and determine responsibility for any needed repairs. When possible, the resident is notified of the inspection and is encouraged to be present. This inspection becomes the basis for any claims that may be assessed against the security deposit.

## **18A MINIMUM HEATING STANDARDS**

The Greensboro Housing Authority shall comply with the heating standards established by the North Carolina State Building Code.

## **19.0 PET POLICY**

### **19.1 EXCLUSIONS**

This policy does not limit or impair the rights of persons with disabilities or their right to have a service animal to assist, support or provide service to persons with disabilities. Assistive animals are allowed in all public housing facilities under this policy with the same restrictions, except deposits and weight restrictions shall be waived. In addition, all tenants must maintain their units and associated facilities in a decent, safe, and sanitary manner and to refrain from disturbing their neighbors.

This policy does not apply to service animals, support animals, assistance animals, or therapy animals that are used to assist persons with disabilities.

These animals are allowed in all public housing facilities with no restrictions other than those imposed on all tenants to maintain their units and associated facilities in a decent, safe, and sanitary manner and to refrain from disturbing their neighbors. The person requesting this exclusion to the Pet Policy of this housing authority must have a disability and the accommodation must be necessary to afford the person with a disability an equal opportunity to use and enjoy a dwelling.

To show that a requested accommodation may be necessary, there must be an identifiable relationship, or nexus, between the requested accommodation and the person's disability. GHA will verify the existence of the disability, and the need for the accommodation— if either is not readily apparent. Accordingly, persons who are seeking a reasonable accommodation for an emotional support animal will be required to provide documentation from a physician, psychiatrist, social worker, or other mental health professional that the animal provides support that alleviates at least one of the identified symptoms or effects of the existing disability.

## **Admissions and Continued Occupancy Policy**

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In addition, GHA is not required to provide any reasonable accommodation that would pose a direct threat to the health or safety of others. Thus, if the particular animal requested by the individual with a disability has a history of dangerous behavior, we will not accept the animal into our housing. Moreover, we are not required to make a reasonable accommodation if the presence of the assistance animal would (1) result in substantial physical damage to the property of others unless the threat can be eliminated or significantly reduced by a reasonable accommodation; (2) pose an undue financial and

administrative burden; or (3) fundamentally alter the nature of the provider's operations.

### **19.2 PETS IN PUBLIC HOUSING**

The Greensboro Housing Authority allows for pet ownership in its developments with the written pre-approval of the Housing Authority. Residents are responsible for any damage caused by their pets, including the cost of fumigating or cleaning their units. In exchange for this right, resident assumes full responsibility and liability for the pet and agrees to hold the Greensboro Housing Authority harmless from any claims caused by an action or inaction of the pet.

### **19.3 APPROVAL**

Residents must have the prior written approval of the Housing Authority before moving a pet into their unit. Residents must request approval on the Authorization for Pet Ownership Form that must be fully completed before the Housing Authority will approve the request. Residents must give the Housing Authority a picture of the pet so it can be identified if it is running loose.

### **19.4 TYPES AND NUMBER OF PETS**

The Greensboro Housing Authority will allow only common household pets. This means only domesticated animals such as a dog, cat, bird, rodent (including a rabbit), fish in aquariums or a turtle will be allowed in units. Common household pets do not include reptiles (except turtles). If this definition conflicts with a state or local law or regulation, the state or local law or regulation shall govern.

All dogs and cats must be spayed or neutered before they become six months old. A licensed veterinarian must verify this fact.

Only one four-legged pet per unit will be allowed.

Any animal deemed to be potentially harmful to the health or safety of others, including attack or fight trained dogs, will not be allowed.

No animal may exceed fifteen (15) pounds in weight or twelve (12) inches in height projected to full adult size.

**19.5 INOCULATIONS**

In order to be registered, pets must be appropriately inoculated against rabies, distemper and other conditions prescribed by state and/or local ordinances. They must comply with all other state and local public health, animal control, and anti-cruelty laws including any licensing requirements. A certification signed by a licensed veterinarian or state or local official shall be annually filed with the Greensboro Housing Authority to attest to the inoculations.

**19.6 PET DEPOSIT**

A pet deposit of \$350 is required at the time of newly registering a pet. The deposit is refundable when the pet or the family vacates the unit, less any amounts owed due to damage beyond normal wear and tear. In addition, residents of family developments will pay a monthly pet maintenance charge of \$25 per month along with their normal rent.

**19.7 FINANCIAL OBLIGATION OF RESIDENTS**

Any resident who owns or keeps a pet in their dwelling unit will be required to pay for any damages caused by the pet. Also, any pet-related insect infestation in the pet owner's unit will be the financial responsibility of the pet owner and the Greensboro Housing Authority reserves the right to exterminate and charge the resident.

**19.8 NUISANCE OR THREAT TO HEALTH OR SAFETY**

The pet and its living quarters must be maintained in a manner to prevent odors and any other unsanitary conditions in the owner's unit and surrounding areas.

Repeated substantiated complaints by neighbors or Greensboro Housing Authority personnel regarding pets disturbing the peace of neighbors through noise, odor, animal waste, or other nuisance may result in the owner having to remove the pet or move him/herself.

Pets that make noise continuously and/or incessantly for a period of 10 minutes or intermittently for one half hour or more to the disturbance of any person at any time of day or night shall be considered a nuisance.

**19.9 DESIGNATION OF PET AREAS**

Pets must be kept in the owner's apartment or on a leash at all times when outside the unit (no outdoor cages may be constructed). Pets will be allowed only in designated areas on the grounds of the property if the Greensboro Housing Authority designates a pet area for the particular site. Pet owners must clean up after their pets and are responsible for disposing of pet waste.

With the exception of assistive animals no pets shall be allowed in the community room, community room kitchen, laundry rooms, public bathrooms, lobby, beauty shop, hallways

To accommodate residents who have medically certified allergic or phobic reactions to dogs, cats, or other pets, those pets may be barred from certain wings (or floors) in our development(s)/(building(s)). This shall be implemented based on demand for this service.

**19.10 MISCELLANEOUS RULES**

Pets may not be left unattended in a dwelling unit for over ten hours. If the pet is left unattended and no arrangements have been made for its care, the Housing Authority will have the right to enter the premises and take the uncared for pet to be boarded at a local animal care facility at the total expense of the resident.

Pet bedding shall not be washed in any common laundry facilities.

Residents must take appropriate actions to protect their pets from fleas and ticks.

All dogs must wear a tag bearing the resident's name and phone number and the date of the latest rabies inoculation.

Pets cannot be kept, bred or used for any commercial purpose.

Residents owning cats shall maintain waterproof litter boxes for cat waste. Refuse from litter boxes shall not accumulate or become unsightly or unsanitary. Litter shall be disposed of in an appropriate manner.

A pet owner shall physically control or confine his/her pet during the times when Housing Authority employees, agents of the Housing Authority or others must enter the pet owner's apartment to conduct business, provide services, enforce lease terms, etc.

If a pet causes harm to any person, the pet's owner shall be required to permanently remove the pet from the Housing Authority's property within 24 hours of written notice from the Housing Authority. The pet owner may also be subject to termination of his/her dwelling lease.

A pet owner who violates any other conditions of this policy may be required to remove his/her pet from the development within 10 calendar days of written notice from the Housing Authority. The pet owner may also be subject to termination of his/her dwelling lease.

The Housing Authority's grievance procedures shall be applicable to all individual grievances or disputes arising out of violations or alleged violations of this policy.

**19.11 VISITING PETS**

No visiting pets will be allowed.

### **19.12 REMOVAL OF PETS**

The Greensboro Housing Authority, or an appropriate community authority, shall require the removal of any pet from a project if the pet's conduct or condition is determined to be a nuisance or threat to the health or safety of other occupants of the project or of other persons in the community where the project is located.

In the event of illness or death of pet owner, or in the case of an emergency which would prevent the pet owner from properly caring for the pet, the Greensboro Housing Authority has permission to call the emergency caregiver designated by the resident or the local Animal Control Agency to take the pet and care for it until family or friends would claim the pet and assume responsibility for it.

Any expenses incurred will be the responsibility of the pet owner.

## **20.0 REPAYMENT AGREEMENTS**

When a resident owes the Greensboro Housing Authority back charges and is unable to pay the balance by the due date, the resident may request that the Greensboro Housing Authority allow them to enter into a Repayment Agreement. The Greensboro Housing Authority has the sole discretion of whether to accept such an agreement. All Repayment Agreements must assure that the full payment is made within a period not to exceed 24 months and shall not exceed \$2400.00. If feasible, the total amount paid will not exceed 40% of monthly adjusted income. All Repayment Agreements must be in writing and signed by both parties. They must include the following elements:

- A. Reference to the paragraphs in the Public Housing lease or whereby the tenant is in non-compliance and may be subject to termination of tenancy or assistance, or both.
- B. The monthly retroactive rent repayment amount is in addition to the family's regular rent contribution and is payable to the PHA.
- C. The terms of the agreement may be renegotiated if there is a decrease or increase in the family's income.
- D. Late and missed payments constitute default of the repayment agreement and may result in termination of tenancy and/or assistance.

Refusal to enter into a Repayment Agreement for monies owed will subject the family to eviction procedures.

## **21.0 FAMILY SELF SUFFICIENCY PROGRAM**

### **21.1 PURPOSE**

The Greensboro Housing Authority's (GHA) Family Self-Sufficiency (FSS) program is designed to promote economic self-sufficiency among families that participate in the program. GHA works with welfare agencies, schools, businesses, and other local partners to develop a comprehensive program that gives participating FSS family members the skills and experience to enable them to obtain employment that pays a living wage.

### **21.2 FAMILY PARTICIPATION REQUIREMENTS**

The GHA Public Housing Family Self Sufficiency Program is a one-time opportunity for all participants regardless of age or disability. There is no Re-Enrollment opportunity for the terminated/graduated GHA former Family Self Sufficiency Program participant.

### **21.3 PROGRAM REQUIREMENTS**

GHA and the head of the FSS family will execute an FSS contract of participation (COP) that specifies the rights and responsibilities of both parties. The head of the FSS family and those family members who decide to participate in the program, work with a Case Manager to execute an Individual Training and Services Plan. The Case Manager will tailor services to the family's needs, and the family must fulfill all requirements to successfully obtain benefits. The contract requires that all family members comply with the lease and become independent of welfare assistance. The head or the FSS family must seek and maintain suitable employment. Possible sanctions for non-compliance with the FSS contract are termination from the program, forfeiture of the FSS escrow account, and withholding or termination of supportive services. The family may request an extension to the FSS contract, not to exceed two years, if it is mutually agreed that the family will achieve the established goals during this period.

### **21.4 FSS ESCROW ACCOUNT**

An interest-bearing FSS escrow account is established by GHA for each participating family. Participants will be provided an account statement at least annually. This escrow credit is based on increases in the family's earned income which is credited to this account by GHA after execution of the FSS contract. The escrow account is available to the family during the term of the contract to enable the family to complete an agreed upon interim goal such as education.

If the family completes the contract with no member receiving welfare cash assistance the balance of the FSS escrow account will be paid to the head of the FSS family. If the contract of participation is terminated the escrow will be forfeited unless otherwise stated. Families who have completed their FSS contract and receive their escrow while still receiving housing assistance will not be terminated from the public housing program.



## **21.5 FSS FAMILY TRANSFERS TO GHA'S HCV FSS PROGRAM**

FSS participants transferring from Public Housing to the Housing Choice Voucher Program must contact the HCVP case manager within 30 days from date of admission to the HCV program to prevent forfeiture of their Public Housing escrow.

## **22.0 TERMINATION**

### **22.1 TERMINATION BY RESIDENT**

The resident may terminate the lease at any time upon submitting a 30-day written notice in compliance with dwelling lease requirements. If the resident vacates prior to the end of the thirty (30) calendar days, they will be responsible for rent through the end of the notice period or until the unit is re-rented, whichever occurs first.

### **22.2 TERMINATION BY THE GREENSBORO HOUSING AUTHORITY**

The Greensboro Housing Authority after July 1, 2002 will not renew the lease of any family that is not in compliance with the community service requirement or an approved Agreement to Cure. If they do not voluntarily leave the property, eviction proceedings will begin.

The Greensboro Housing Authority will terminate the lease for serious or repeated violations of material lease terms. Such violations include, but are not limited, to the following:

- A. Nonpayment of rent or other charges;
- B. A history of late rental payments;
- C. Failure to provide timely and accurate information regarding family composition, income circumstances, or other information related to eligibility or rent;
- D. Failure to allow inspection of the unit;
- E. Failure to maintain the unit in a safe and sanitary manner;
- F. Assignment or subletting of the premises;
- G. Use of the premises for purposes other than as a dwelling unit (other than for

Greensboro Housing Authority approved resident businesses);

- H. Destruction of property;
- I. Acts of destruction, defacement, or removal of any part of the premises or failure to cause guests to refrain from such acts;
- J. Any criminal activity on the property or drug-related criminal activity on or off the premises. This includes any tenant, member of a tenant's household or guest, and any such activity engaged in on the premises by any other person under the tenant's control. This includes, but is not limited to, the manufacture of methamphetamine on the premises of the Greensboro Housing Authority or on the premises of any other federally assisted housing;
- K. Non-compliance with Non-Citizen Rule requirements;
- L. Permitting persons not on the lease to reside in the unit more than fourteen (14) calendar days each year without the prior written approval of the Greensboro Housing Authority;
- M. Any activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents or employees of the Authority by the resident, household members, or guests of the resident or threatens the health, safety, or right to peaceful enjoyment of their residences by persons residing in the immediate vicinity of the premises is grounds for termination of tenancy;
- N. Alcohol abuse that the Greensboro Housing Authority determines interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents;
- O. Failure to perform required community service or be exempted there from;
- P. The Greensboro Housing Authority will take immediate action to evict any household that includes an individual who is subject to a lifetime registration requirement under a State sex offender registration program;
- Q. Determination that a household member is illegally using a drug or when GHA determines that a pattern of illegal use of a drug interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents. The use of medical marijuana is included in this ban;
- R. Criminal activity as shown by a criminal record. In such cases GHA will notify the household of the proposed action to be based on the information and will provide the subject of the record and the tenant with a copy of the criminal record before the Greensboro Housing Authority grievance hearing or court trial concerning the termination of tenancy or eviction. The tenant will be given the opportunity to dispute the accuracy and relevance of that record in the grievance hearing or court trial;

In deciding whether to exercise their discretion to terminate an individual or household that has engaged in criminal activity, the Greensboro Housing Authority will consider all of the circumstances relevant to the particular admission or eviction decision, including but not limited to: the seriousness of the offending action; the effect that eviction of the entire household would have on family members not involved in the criminal activity; and the extent to which the leaseholder has taken all reasonable steps to prevent or mitigate the criminal activity.

An arrest record, alone, will not serve as sufficient evidence of criminal activity that can support an adverse termination, or eviction decision. Before the Greensboro Housing Authority evicts an individual or household on the basis of criminal activity by a household member or guest, it will determine that the relevant individual actually engaged in such activity.

An arrest record can trigger an inquiry into whether there is sufficient evidence to determine that a person engaged in disqualifying criminal activity, but is not itself evidence on which to base a determination. The Greensboro Housing Authority can utilize other evidence, such as police reports detailing the circumstances of the arrest, witness statements, and other relevant documentation to assist them in making a determination that disqualifying conduct occurred. Reliable evidence of a conviction for criminal conduct that would disqualify an individual for tenancy may also be the basis for determining that the disqualifying conduct in fact occurred

- S. Currently owes rent or other amounts as a result of unreported income in excess of \$2400 annually, or \$200 monthly, and refuses to sign a repayment agreement to the Greensboro Housing Authority in connection with HCVP or Public Housing assistance under the 1937 Act is grounds for termination;
- T. Disconnecting a smoke detector in any manner, removing any batteries from a smoke detector or failing to notify the Housing Authority if the smoke detector is inoperable for any reason;
- U. If the resident stays in the unit after giving GHA notice in writing to vacate the unit; and
- V. Other good cause.

In deciding to terminate a tenancy for illegal drug use or a pattern of illegal drug use by a household member who is no longer engaging in such use, or for abuse or a pattern of abuse of alcohol by a household member who is no longer engaging in such abuse, the Greensboro Housing Authority may consider whether such household member:

1. Is participating in a supervised drug or alcohol rehabilitation program;

2. Has successfully completed a supervised drug or alcohol rehabilitation program; or
3. Has otherwise been successfully rehabilitated.

For this purpose, the Greensboro Housing Authority may require the leaseholder to submit evidence of one of the above 3 statements.

## **23.0 VIOLENCE AGAINST WOMEN**

**VAWA** means the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109–162, approved August 28, 2006), as amended by the U.S. Housing Act of 1937 (42 U.S.C. 1437d and 42 U.S. 1437f). **VAWA** protects tenants and affiliated individuals of tenants who are victims of domestic violence, dating violence or stalking from eviction or termination from housing assistance based on acts of violence against them.

### **23.1 VAWA PROTECTIONS**

Under the Violence Against Women Act (**VAWA**, notwithstanding the title of the statute, protections are not limited to women but cover victims regardless of sex, gender identity, or sexual orientation), public housing residents have the following specific protections, which will be observed by the Greensboro Housing Authority:

An incident or incidents or actual or threatened domestic violence, dating violence, sexual assault, or stalking will not be construed as a serious or repeated violation of the lease by the victim or threatened victim of that violence, and shall not in itself be good cause for terminating the assistance, tenancy, or occupancy rights of the victim of such violence.

The Greensboro Housing Authority shall provide each applicant and resident a HUD prescribed Notice of Occupancy Rights and Certification form. It shall also be provided with any notice of eviction. In addition, the Authority shall make an adopted Emergency Transfer Plan and Emergency Transfer Request available upon request.

The Greensboro Housing Authority shall keep a record of all emergency transfer requests requested under the Emergency Transfer Plan and the outcome of these requests for three years.

GHA may terminate the assistance to remove a lawful occupant or tenant who engages in criminal acts or threatened acts of violence, dating violence, sexual assault, or stalking to family members or affiliated individuals without terminating the assistance or evicting victimized lawful occupants. This is also true even if the household member or affiliated individual is not a signatory to the lease. Under **VAWA**, the Greensboro Housing Authority is granted the authority to bifurcate the lease. The **VAWA** victim must be the one who retains the assistance.

If the remaining tenant cannot establish eligibility, Greensboro Housing Authority will provide the tenant 30 days to find new housing or establish eligibility under another covered housing program.

GHA will honor court orders regarding the rights of access or control of the property.

There is no limitation on the ability of the Housing Authority to evict for other good cause unrelated to the incident or incidents of domestic violence, dating violence, sexual assault, or stalking, other than the victim may not be subject to a “more demanding standard” than non-victims.

There is no prohibition on the Housing Authority evicting if it “can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant’s (victim’s) tenancy is not terminated.” An actual and imminent threat consists of a physical danger that is real, would occur within an immediate timeframe, and could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include: the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur.

Any protections provided by law which give greater protection to the victim are not superseded by these provisions.

The Greensboro Housing Authority shall require verification in all cases where an individual claims protection against an action involving such individual proposed to be taken by GHA. Types of acceptable verifications are outlined below, and must be submitted within 14 business days after receipt of GHA’s written request for verification.

### ***23.2 VERIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING***

The Greensboro Housing Authority shall require verification in all cases where an individual claims protection against an action involving such individual proposed to be taken by the Housing Authority.

- A. *Requirement for Verification.*** The law allows, but does not require, the Greensboro Housing Authority to verify that an incident or incidents of actual or threatened domestic violence, dating violence, sexual assault, or stalking claimed by a tenant or other lawful occupant is bona fide and meets the requirements of the applicable definitions set forth in this policy. GHA shall require verification in all cases where an individual claims protection against an action involving such individual proposed to be taken by GHA.

Verification of a claimed incident or incidents of actual or threatened domestic violence, dating violence, sexual assault, or stalking may be accomplished in one of the following three ways:

1. ***HUD-approved form-*** By providing to GHA a written certification, on the form approved by the U.S. Department of Housing and Urban Development (HUD), that the individual is a victim of domestic violence, dating violence, sexual assault, or stalking that the incident or incidents in question are bona fide incidents of actual or threatened abuse meeting the requirements of the applicable definition(s) set forth in this policy. The incident or incidents in question must be described in reasonable detail as required in the HUD-approved form, and the completed certification must include the name of the perpetrator, only if the name of the perpetrator is safe to provide and is known to the victim.
  2. ***Other documentation*** - by providing to the Greensboro Housing Authority documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional, from whom the victim has sought assistance in addressing the domestic violence, dating violence, sexual assault, or stalking, or the effects of the abuse, described in such documentation. The professional providing the documentation must sign and attest under penalty of perjury (28 U.S.C. 1746) to the professional's belief that the incident or incidents in question are bona fide incidents of abuse meeting the requirements of the applicable definition(s) set forth in this policy. The victim of the incident or incidents of domestic violence, dating violence, sexual assault, or stalking described in the documentation must also sign and attest to the documentation under penalty of perjury.
  3. ***Police or court record*** – by providing to GHA a Federal, State, tribal, territorial, or local law enforcement or court record describing the incident or incidents in question.
- B. *Time allowed to provide verification/failure to provide.*** An individual who claims protection against adverse action based on an incident or incidents of actual or threatened domestic violence, dating violence, sexual assault, or stalking, and who is requested by GHA to provide verification, must provide such verification within 14 business days after receipt of the written request for verification. Failure to provide verification, in proper form within such time will result in loss of protection under VAWA and this policy against a proposed adverse action. The submission of false information may be the basis for the termination of assistance or foreviction.
- C. *Managing conflicting documentation.*** In cases where the Greensboro Housing Authority receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the Greensboro Housing Authority may determine which is the true victim by requiring third-party

documentation as described in 24 CFR 5.2007 and in accordance with any HUD guidance as to how such determinations will be made.

GHA shall honor any court orders addressing rights of access or control of the property, including civil protection orders issued to protect the victim and issued to address the distribution or possession of property among the household.

### **23.3 CONFIDENTIALITY**

All information provided under VAWA including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking, shall be retained in confidence and shall not be entered into any shared database or provided to any related entity except to the extent that the disclosure is:

- A. Requested or consented to by the individual in writing;
- B. Required for use in an eviction proceeding; or
- C. Otherwise required by applicable law.

An emergency transfer to another available and safe dwelling under a covered housing program may be available to a tenant if the tenant requests a transfer, and either the tenant reasonably believes he or she is threatened with imminent harm from further violence if he or she remains in the unit or, if the tenant is a sexual assault victim, and the sexual assault occurred on the premises during the 90 day period preceding the transfer request.

The Greensboro Housing Authority shall provide its residents notice of their rights under VAWA including their right to confidentiality and the limits thereof.

### **24.0 ABANDONMENT**

The Greensboro Housing Authority will consider a unit to be abandoned when a resident has both fallen behind in rent **AND** has clearly indicated by words or actions an intention not to continue living in the unit.

When a unit has been abandoned, a Greensboro Housing Authority representative may enter the unit and inventory the personal property. GHA will maintain the personal property in the unit for a period of 10 days; if the property is not claimed, it will be disposed of in accordance with state law.

### **25.0 RETURN OF SECURITY DEPOSIT**

After a family moves out, the Greensboro Housing Authority will return the security deposit within thirty (30) calendar days and give the family a written statement of why all or part of the security deposit is being kept. The rental unit must be restored to the same conditions as when the family moved in, except for normal wear and tear. Deposits will not be used to cover normal wear and tear or damage that existed when the family moved in.

If State law requires the payment of interest on security deposits, it shall be complied with. The Greensboro Housing Authority will be considered in compliance with the above if the required payment, statement, or both, are deposited in the U.S. mail with first class postage paid within 30 calendar days.

## **26.0 CONDUCTING BUSINESS IN ACCORDANCE WITH CORE VALUES AND ETHICAL STANDARDS**

### **26.1 PURPOSE**

This Code of Conduct establishes standards for employee and Commissioner conduct that will assure the highest level of public service. Recognizing that compliance with any ethical standards rests primarily on personal integrity and specifically in this situation with the integrity of the employees and Commissioners of GHA, this section sets forth those acts or omissions of acts that could be deemed injurious to the general mission of the Authority.

This Code of Conduct is not intended, nor should it be construed, as an attempt to unreasonably intrude upon the individual employee or Commissioner's right to privacy and the right to participate freely in a democratic society and economy.

### **26.2 CONFLICT OF INTEREST**

In accordance with 24 CFR 982.161, neither GHA nor any of its contractors or subcontractors may enter into any contract or arrangement in connection with the tenant-based programs in which any of the following classes of persons has any interest, direct or indirect, during his or her tenure with GHA or for one year thereafter:

- A. Any present or former member or officer of GHA (except a participant commissioner);
- B. Any employees of GHA or any contractor, subcontractor or agent of GHA who formulates policy or who influences decisions with respect to the programs;
- C. Any public official, member of a governing body, or State or local legislator who exercises functions or responsibilities with respect to GHA programs; or
- D. Any member of the Congress of the United States.

Any member of the classes described in A-D must disclose their interest or prospective interest to GHA and HUD.

The Conflict of Interest prohibition under this section (26.2) may be waived by the HUD Field Office upon the request of GHA for good cause.

### **26.3 PROHIBITION OF SOLICITATION OR ACCEPTANCE OF GIFTS**



No Commissioner or Authority employee shall solicit any gift or consideration of any kind, nor shall any Authority employee accept or receive a gift having value in excess of \$25.00 regardless of the form of the gift, from any person who has an interest in any matter proposed or pending before the Authority.

#### **26.4 HOUSING AUTHORITY ADMINISTRATIVE AND DISCIPLINARY REMEDIES FOR VIOLATION OF HOUSING AUTHORITY CODE OF CONDUCT**

Violations of this Code of Conduct Policy will result in disciplinary action as outlined in GHA's Personnel Policy.

### **27.0 SUPPORT FOR OUR ARMED FORCES**

A major and important component of our armed forces are the part-time military personnel that serve in various Reserve and National Guard units. The Greensboro Housing Authority is very supportive of these men and women. An unfortunate fact of service in both the Reserves and National Guard is that from time to time their personnel are activated to full-time status and asked to serve our country in a variety of ways and circumstances. Whenever the Federal Government activates Reserve and/or National Guard personnel, the Greensboro Housing Authority wants to support these brave warriors in the following manners:

- A. If a family finds it necessary for another adult to temporarily move into a unit solely to serve as a temporary guardian for children residing in the unit, the income received by the temporary guardian will not be counted in determining family income.
- B. Although typically a criminal background check is required before anyone can move into a public housing unit, this requirement will be waived for a temporary guardian. Instead, the background check will occur after the person moves in. If the results of the check dictate that the person is ineligible for public housing, the family shall be given a reasonable time to find a replacement temporary guardian.
- C. Recognizing that activation in the Reserves or National Guard can be very disruptive to a family's income, the Greensboro Housing Authority will expeditiously re-evaluate a resident's rent if requested to do so and will exercise reasonable restraint if the activated resident has trouble paying their rent.
- D. Typically, a unit cannot be held by a family that is not residing in it as their primary residence.
- E. If all members of a military family are temporarily absent from the unit because a member of the family has been called to active duty, the family can retain control of the unit by paying the required rent and returning to the unit within 30 calendar days of the conclusion of the active duty service.

### **28.0 ANTI-FRAUD POLICY**

The Greensboro Housing Authority is fully committed to combating fraud in its public

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housing program. It defines fraud as a single act or pattern of actions that include false statements, the omission of information, or the concealment of a substantive fact made with the intention of deceiving or misleading the Greensboro Housing Authority. It results in the inappropriate expenditure of public housing funds and/or a violation of public housing requirements.

Although there are numerous different types of fraud that may be committed, the two most common are the failure to fully report all sources of income and the failure to accurately report who is residing in the residence. The Greensboro Housing Authority shall aggressively attempt to prevent all cases of fraud.

When a fraudulent action is discovered, the Greensboro Housing Authority shall take action. It shall do one or more of the following things depending on circumstances and what it determines appropriate:

- A. Require the resident to immediately repay the amount in question;
- B. Require the resident to enter into a satisfactory repayment agreement as set forth in a previous section of this Policy;
- C. Terminate the resident's tenancy;
- D. Refer the case for criminal prosecution; or
- E. Take such other action as the Greensboro Housing Authority deems appropriate.

## **29.0 BED BUGPOLICY**

The Greensboro Housing Authority recognizes the potential problems that can arise out of bedbug infestations in public housing. Accordingly, the Greensboro Housing Authority adopts this policy in an effort to minimize bedbug infestations in its public housing, Housing Choice Voucher Program, and other owned affordable housing.

### ***29.1 HOUSING AUTHORITY'S RESPONSIBILITIES***

The Greensboro Housing Authority shall provide training to appropriate staff members regarding the identification, prevention, and eradication of bedbugs.

The Greensboro Housing Authority shall make efforts to educate new and existing residents on methods that may be utilized in order to prevent and detect bedbugs. Such efforts may include written handouts distributed to all residents and public workshops for residents to attend (See sample handout attached to this policy).

The Greensboro Housing Authority will keep a qualified pest control company under contract so they can be called on an "as needed" basis if internal staff is inadequate to deal with a bedbug infestation.

The Greensboro Housing Authority shall keep written records of reports and incidents of bedbug infestation. Said records shall identify the dates, times and places of such reports or incidents.

## **29.2 INSPECTION OF UNIT**

If a resident reports the existence of bedbugs in his or her unit, the Greensboro Housing Authority shall within 24 hours make contact with the resident, provide the resident with information about control and prevention of bedbugs and discuss measures the resident may be able to take in the unit before an inspection is performed.

Following a report of bedbugs, the Greensboro Housing Authority or a qualified third party trained in bedbug detection shall inspect the dwelling unit to determine if bedbugs are present.

It is critical that inspections be conducted by trained staff or third-party professionals. Low level infestations may escape visual detection.

For this reason, multiple detection tools, such as monitors containing attractants and canine detection may be utilized. The inspections shall occur within three business days of the resident report when possible.

The inspection shall cover the unit reporting the infestation and no less than the adjoining apartment in a duplex or surrounding apartments consisting of the units above, below, left and right in a multifamily building if these units exist.

If the initial inspection confirms the presence of bedbugs, the Greensboro Housing Authority will contact a licensed pest control company to treat the infestation. The length, method and extent of the treatment will depend on the severity and complexity of the infestation, and the level of cooperation of the residents. The resident may expect treatment to begin within five days of the inspection, though depending on the form of treatment and/or the availability of the contractor, this may not be possible.

Residents should be advised that treatment may take several weeks and possibly several applications.

If an infestation is suspected but cannot be verified, the Greensboro Housing Authority will re-inspect the unit(s) periodically over the next several months.

If licensed pest control companies are unattainable within three calendar days, the Greensboro Housing Authority shall retain documentation of the efforts to obtain qualified services.

## **30.0 PRIVACY**

The Greensboro Housing Authority is strongly committed to protecting the privacy of people dealing with the agency to the greatest degree practical. There are numerous federal

privacy laws, regulations, notices, and other requirements that the Housing Authority follows to the greatest degree practical. Details about these requirements are set forth in PIH Notice 2015-06 and any ensuing publications. The Housing Authority will educate all of its employees who have access to personally identifiable information (PII) and/or Sensitive Personally Identifiable Information about these requirements and expect them to appropriately manage and safeguard the information. Employees will also be trained on the proper disposition of said information.

## **31.0 NON-SMOKING POLICY**

### **INTRODUCTION**

The U.S. Department of Housing and Urban Development (HUD) has encouraged the adoption of the smoke-free policies for the past several years. In 2009 and 2012, HUD's Office of Public and Indian Housing issued Notice PIH 2009-21 and PIH 2012-25 stating HUD "strongly encourages Public Housing Authorities (PHAs) to implement non-smoking policies in some or all of their public housing units." HUD published new rule that require that all Housing Authority properties become smoke free no later than eighteen (18) months from the effective date of the rule, February 3, 2017. HUD emphasizes that the Final Rule, unlike previous HUD guidance on smoking, is not optional or merely a recommendation but require full compliance, with effective policy amendments and executed lease, no later than 2018. According to the American Lung Association, cigarette smoking is the number one cause of preventable disease in the United States. The Surgeon General has concluded that there is no risk-free level of exposure to secondhand smoke. The elderly and young populations, as well as people with chronic illnesses, are especially vulnerable to the adverse effects of smoking. Because Environmental Tobacco Smoke (ETS) can migrate between units in multifamily housing, causing respiratory illness, heart disease, cancer and other adverse health effects in neighboring families. HUD issued in the Federal Register commence the public comment process – Department of Housing, 24 CFR Parts 965 and 966, Docket No. FR5597-F-03, RIN 2577-AC97. The Final Rule would require each public housing agency (PHA) administering public housing to implement a smoke-free policy. Specifically, this rule proposes that no later than 18 months from the effective date of the final rule, each PHA must implement a "smoke-free" policy banning the use of tobacco products in all public housing living units, indoor common areas in public housing, and in PHA administrative buildings. A major reason that HUD is committed to encouraging public housing authorities ( PHAs) and property owners/agents of subsidized or market rate multifamily to implement smoke-free policies, is that the movement of secondhand smoke between units cannot be controlled in multifamily buildings. HUD also supports smoke-free policies because of the known health effects of secondhand smoke, increased risk of fire and increased maintenance cost. Greensboro Housing Authority has determined that for the benefit and well-being of the residents, guest, employees and all who visit any GHA owned properties or facilities. Effective May 2018, all Greensboro Housing Authority (GHA) properties, which includes all current residents, all new residents, all GHA employees, vendors, all guest and other individuals under resident's control will be prohibited from smoking and use of tobacco products on all GHA properties which includes dwelling units, housing development community centers, and the housing developing grounds bytenant(s), guest(s) or Invitee(s).

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Copies of this policy shall be distributed to all current leaseholders, tenants, residents, new residents, applicants, and employees.

### **DEFINITIONS:**

Smoking: The term “smoking” means but not limited to lit and inhaled, exhaling, breathing, burning, carrying tobacco, K-2/spice, and marijuana, in any form including cigarettes, any lighted cigar, cigarette, pipes, and hookah other tobacco products, or similar lighted smoking materials in any manner or in any form including all electronic cigarette, incense products or vapor products, commonly referred to as “e-cigarettes”. In addition, “use of tobacco products”, also includes snuff/chew.

Electronic Cigarettes: The term “electronic cigarettes” means any electronic device that provides a vapor or aerosol of liquid nicotine and /or other substances to the user as s/he simulates smoking. The term shall include all such devices whether they are manufactured or referred to as e-cigarettes, e-cigars, e-hookah, or under any other product name.

The term “leaseholder” “resident” and “tenant” shall refer to any entity or person(s) who have signed a lease agreement leasing a housing unit from any Greensboro Housing Authority owned properties. Tenant(s) is a party to a written Lease with the GHA. Members of Tenant’s family and/or household are named in the Lease Agreement.

### **IMPLEMENTATION**

Effective May 1, 2018, the Greensboro Housing Authority has adopted a new Tobacco/Smoke –Free policy, 18 months after date of publication in the Federal Register. This HUD mandated Final Rule, unlike previous HUD guidance on smoking, is not optional or merely a recommendation but require full compliance, with effective policy amendments and executed lease by May 2018. During the first \_\_\_\_\_ (number of days) following the implementation of the smoke-free policy, residents, visitors, and employees will be issued a verbal and written reminder of the new policy, and will be offered resources to assist them in quitting smoking, should they so desire. The Greensboro Housing Authority will make available for public comment a draft of the Tobacco/Smoke-Free Housing Policy. The 30- day Public Comment Period will begin on \_\_\_\_\_, Month, 2018 and end on Day, Month 30, 2018. The proposed policy will be available for review at the Housing Development Management Offices.

### **SMOKING SHALL NOT BE PERMITTED:**

By any person including all current residents, all new residents, all GHA employees, vendors, all guests and other individuals under resident’s control on any Greensboro Housing Authority owned properties. This includes dwelling units, housing development community centers, and the housing development grounds

### **RULE AND REGULATIONS**

All leaseholders, residents and tenants of housing units, live-in residents, roommates or occupants of those housing units and their guests, agents, vendors, employees and invitees must abide by the following rules and regulations:

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1. Smoking and the use of Tobacco products shall not be permitted anywhere on any property owned by Greensboro Housing Authority, including but not limited to, individual apartments or housing units, balconies and patios attached or a part of those housing units and including all common areas such as entryways, hallways, restrooms, elevators, stairways, landings, laundry rooms, yard, other common areas and parking lots.
2. Enforcement procedures will include formal notices of violation and notices of lease termination and eviction. That is, violation of the no-smoking policy by the leaseholder, resident or tenant or by any of his or her guests, live in residents, invitees, agents, vendor, or employees may be treated as a material breach of the tenant's lease agreement and enforced in accordance with the notice and termination procedures that apply to the lease or rental agreement of the particular leaseholder, resident or tenant who have themselves violated or who are responsible for those who have violated the no-smoking policy. "No Smoking" signs will be posted outside and inside of the building.
3. Leaseholder, residents and tenants are responsible for ensuring that all other live-in residents, guests, invitees, agents, and employees of the housing unit for which the leaseholder, resident or tenant is responsible are made aware of and comply with this policy.
4. If leaseholders or residents smell tobacco in any place on the property, they are to report this to the management office in writing as soon as possible. Management will endeavor to seek the source of the smoke and take appropriate action.
5. Failure to comply with any of the rules or regulations contained in this policy will be considered a material lease violation as set forth below and subject to all leasehold remedies including, but not limited to lease termination, eviction and damages which may include the cost to clean items discolored and/ or which contain the odor of smoke including, but not limited to carpets, blinds and walls or the cost of repair burns marks and remove cigarette butts or residue.

### **Lease Violations:**

1. First Violation – verbal warning issued & resident issued Smoke-Free housing resources materials and provided information on the NC Quit line and local cessation resources.
2. Second Violation – written warning issued, meeting with property manager, letter documenting the first informal meeting, reiterating the smoke-free policy and advising the resident of further consequences, delivery of resident with Smoke-Free housing resources materials, provided information on the Quit line and local cessation resources.
3. Third Violation – written warning issued and conference with resident by the property manager, including a written agreement acknowledging their understanding of the policy to be signed by the resident. In addition,

resident provided with Smoke-Free housing resource materials, provided information on the NC Quit line and local cessation resources.

4. Fourth Violation – Thirty (30) day lease termination Notice. Resident/Tenant (s) will be responsible for any and all damages (s) caused in violation of this policy.

**Reasonable Accommodations:**

*In addition, Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act provides the participant the right to seek a reasonable accommodation, including accommodation from an eligible participant must at least be considered, and granted in appropriate circumstances. To assist PHAs, HUD will work with its Office of Fair Housing and Equal Opportunity to develop guidance on accommodating persons with a disability related to smoke-free policies. The guidance will be informed by comments on the proposed rule and issued in advance of the final rule on a case by case basis. PHAs may require that all remaining leases be amended, or may establish their own schedule for lease amendments. PHAs would be required to follow the PIH administrative grievance procedures during enforcement of their smoke-free housing policies.*

**COMMUNICATION OF POLICY**

This policy shall be communicated by the property manager to all current leaseholders, residents and employees of the Greensboro Housing Authority at least ninety (60) days prior to its effective date, including thirty (30) days of a soft implementation period, and at the time of employment for all new employees, and prior to admission and /or prior to the signing of a lease for any new leaseholder or resident.

- a. New leaseholders shall be given two (2) copies of the policy. After review, the leaseholder must sign one copy and return the executed copy to the property manager prior to moving in. The property manager shall place the signed copy in the leaseholder’s file.
- b. Upon adoption of the policy, all persons whose name are on a lease of a housing unit owned by Greensboro Housing Authority shall be given two copies of the policy by property manager. After review, all such persons must sign one copy and return the executed copy to the property manager within ten (10) days. The property manager shall place the signed copy in the leaseholder/resident/tenant’s file. In the event that any such person fails or refuses to sign his or her confirmation that he or she has read, understood and agrees to comply with the provisions of the Greensboro Housing Authority no-smoking policy, the Greensboro Housing Authority will, nevertheless, be entitled to assume and understand that every such leaseholder read, understood and agreed to comply with the

- c. Residents will be advised of any available resources to assist them to quit smoking, should they so desire, including educational classes on site or in the community, as well as access to the toll-free NC Quitline or other resources as appropriate.

### Complaints.

If leaseholder or resident witnesses someone smoking or smells tobacco smoke in any place within the interior of any Greensboro Housing Authority owned properties or witnesses someone smoking on the grounds, the leaseholder or resident should report the violation or the odor to the property manager in writing as soon as possible.

## GLOSSARY

**50058 Form:** The HUD form that housing authorities are required to complete and electronically submit to HUD for each assisted household in public housing to record information used in the certification and re-certification process and, at the option of the housing authority, for interim reexaminations. Housing Authorities must retain at a minimum the last three years of the form 50058, and supporting documentation, during the term of each assisted lease, and for a period of at least three years from the end of participation date. Electronic retention of form HUD 50058 and HUD 50058-FSS and supporting documentation fulfills the record retention requirement. The 50058s must be submitted to HUD no later than 60 days from the effective date of actions recorded in Line 2b.

**1937 Housing Act:** The United States Housing Act of 1937 (42 U.S.C. 1437 et seq.) (24 CFR 5.100)

**Actual and imminent threat:** a physical danger that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include: The duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur.

**Adjusted Annual Income:** The amount of household income, after deductions for specified allowances, on which tenant rent is based. (24 CFR 5.611)

**Adult:** A household member who is 18 years or older or who is the head of the household, or spouse, or co-head. An emancipated minor is also considered an adult. In the anti- drug portions of this policy, it also refers to a minor who has been convicted of a crime as an



adult under any Federal, State or tribal law.

**Affiliated Individual:** with respect to an individual, means: (1) A spouse, parent, brother, sister, or child of that individual, or a person to whom that individual stands in the place of a parent or guardian (for example, the affiliated individual is a person in the care, custody, or control of that individual); or (2) Any individual, tenant, or lawful occupant living in the household of that individual.

**Allowances:** Amounts deducted from the household's annual income in determining adjusted annual income (the income amount used in the rent calculation). Allowances are given for elderly families, dependents, medical expenses for elderly and disabled families, disability expenses, and childcare expenses for children under 13 years of age. Other allowance can be given at the discretion of the housing authority.

**Annual Contributions Contract (ACC):** The written contract between HUD and a housing authority under which HUD agrees to provide funding for a program under the 1937 Act, and the housing authority agrees to comply with HUD requirements for the program. (24 CFR 5.403)

**Annual Income:** All amounts, monetary or not, that:

- A. Go to (or on behalf of) the family head or spouse (even if temporarily absent) or to any other family member; or
- B. Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- C. Are not specifically excluded from annual income.

Annual Income also includes amounts derived (during the 12-month period) from assets to which any member of the family has access. (1937 Housing Act; 24 CFR 5.609)

**Applicant (applicant family):** A person or family that has applied for admission to a program but is not yet a participant in the program. (24 CFR 5.403)

**Assets:** The value of equity in savings, checking, IRA and Keogh accounts, real property, stocks, bonds, and other forms of capital investment. The value of necessary items of personal property such as furniture and automobiles are not counted as assets. (Also see "net family assets.")

**Asset Income:** Income received from assets held by family members. If assets total more than \$5,000, income from the assets is "imputed" and the greater of actual asset income and imputed asset income is counted in annual income. (See "imputed asset income" below.)

**Assistance applicant:** A family or individual that seeks admission to the public housing program.

**Bifurcate:** means to divide a lease as a matter of law, subject to the permissibility of such

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process under the requirements of the applicable HUD covered program and State or local law, such that certain tenants or lawful occupants can be evicted or removed and the remaining tenants or lawful occupants can continue to reside in the unit under the same lease requirements or as may be revised depending upon the eligibility for continued occupancy of the remaining tenants and lawful occupants.

**Business Days:** Days the housing authority is open for business.

**Ceiling Rent:** Maximum rent allowed for some units in public housing developments under the income method of calculating rent.

**Certification:** The examination of a household's income, expenses, and family composition to determine the family's eligibility for program participation and to calculate the family's share of rent.

**Child:** For purposes of citizenship regulations, a member of the family other than the family head or spouse who is under 18 years of age. (24 CFR 5.504(b))

**Childcare Expenses:** Amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for childcare. In the case of childcare necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income. (24 CFR 5.603(d))

**Citizen:** A citizen or national of the United States. (24 CFR 5.504(b))

**Community service:** The performance of voluntary work or duties that are a public benefit and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community. Community service is not employment and may not include political activities.

**Consent Form:** Any consent form approved by HUD to be signed by assistance applicants and participants for the purpose of obtaining income information from employers and SWICAs, return information from the Social Security Administration, and return information for unearned income from the Internal Revenue Service. The consent forms may authorize the collection of other information from assistance applicants or participant to determine eligibility or level of benefits. (24 CFR 5.214)

**Covered Families:** Families who receive welfare assistance or other public assistance benefits ("welfare benefits") from a State or other public agency ("welfare agency") under a program for which Federal, State, or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance.

**Covered Person:** For purposes of the anti-drug provisions of this policy, a covered person is a tenant, any member of the tenant's household, a guest or another person under the

**Currently engaging in:** With respect to behavior such as illegal use of a drug, other drug-related criminal activity, or other criminal activity, currently engaging in means that the individual has engaged in the behavior recently enough to justify a reasonable belief that the individual's behavior is current. Arrests alone are not sufficient evidence of criminal activity.

**Dating Violence:** Violence committed by a person: (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) the length of the relationship; (ii) the type of relationship; and (iii) the frequency of interaction between the persons involved in the relationship.

**Decent, Safe, and Sanitary:** Housing is decent, safe, and sanitary if it satisfies the applicable housing quality standards.

**Department:** The Department of Housing and Urban Development. (24 CFR 5.100)

**Dependent:** A member of the family (except foster children and foster adults), other than the family head or spouse, who is under 18 years of age or is a person with a disability or is a full-time student. (24 CFR 5.603(d))

**Dependent Allowance:** An amount, equal to \$480 multiplied by the number of dependents, that is deducted from the household's annual income in determining adjusted annual income.

**Disability Assistance Expenses:** Reasonable expenses that are anticipated, during the period for which annual income is computed, for attendant care and auxiliary apparatus for a disabled family member and that are necessary to enable a family member (including the disabled member) to be employed, provided that the expenses are neither paid to a member of the family nor reimbursed by an outside source. (24 CFR 5.603(d))

**Disability Assistance Expense Allowance:** In determining adjusted annual income, the amount of disability assistance expenses deducted from annual income for families with a disabled household member.

**Disabled Family:** A family whose head (including co-head), spouse, or sole member is a person with disabilities; two or more persons with disabilities living together; or one or more persons with disabilities living with one or more live-in aides. (24 CFR 5.403(b)) (Also see "person with disabilities.")

**Disabled Person:** See "person with disabilities."

**Displaced Family:** A family in which each member, or whose sole member, is a person displaced by governmental action (such as urban renewal), or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws. (24 CFR 5.403(b))

**Displaced Person:** A person displaced by governmental action or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws. *[1937 Act]*

**Domestic Violence:** Includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim share a child in common, by a person who is cohabitated with or has cohabited with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that persons acts under the domestic or family violence laws of the jurisdiction. The term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.

**Drug:** means a controlled substance as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802).

**Drug-Related Criminal Activity:** The illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug.

**Economic self-sufficiency program:** Any program designed to encourage, assist, train or facilitate the economic independence of HUD-assisted families or to provide work for such families. These programs include programs for job training, employment counseling, work placement, basic skills training, education, English proficiency, workfare, financial or household management, apprenticeship, and any program necessary to ready a participant for work (including a substance abuse or mental health treatment program), or other work activities.

**Elderly Family:** A family whose head (including co-head), spouse, or sole member is a person who is at least 62 years of age; two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides. (24 CFR 5.403)

**Elderly/Disabled Family Allowance:** For elderly families, an allowance of \$400 is deducted from the household's annual income in determining adjusted annual income.

**Elderly Person:** A person who is at least 62 years of age. (1937 Housing Act)

**Employment:** Employment for admission preference purposes is defined as:

Employment must be current and have lasted a minimum of 365 calendar days prior to the time the preference is claimed. The employment must provide a minimum of 30 hours of work per week for the family member claiming the preference

The amount of earned income shall not be a factor in granting this preference.

The employment part of this preference is also extended equally to (1) a family if the head, spouse, or sole member is 62 years of age or older or who is receiving social security or Supplemental Security Income disability benefits or any other payments based on the individual's inability to work and, (2) any family whose head, spouse, co-head or unrelated partner of head of household is currently a full time student or enrolled in an employment training program.

**Extremely low-income families:** Those families whose incomes do not exceed the higher of 30% of the median income for the area (as determined by HUD with adjustments for smaller and larger families) or the Federal poverty level, except that HUD may establish income ceilings higher or lower than 30% of the median income for the area if HUD finds that such variations are necessary because of unusually high or low family incomes.

**Fair Housing Act:** Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988 (42 U.S.C. 3601 et seq.). (24 CFR 5.100)

**Family** includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

1. A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or
2. A group of persons residing together, and such group includes, but is not limited to:
  - a. A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
  - b. An elderly family;
  - c. A near-elderly family;
  - d. A disabled family;
  - e. A displaced family;
  - f. The remaining member of a tenant family; and
  - g. A single person who is not an elderly or displaced person, a person with disabilities, or the remaining member of a tenant family. (24 CFR 5.403)

**Family Members:** All members of the household other than live-in aides, foster children, and foster adults. All family members permanently reside in the unit, though they may be temporarily absent. All family members are listed on the lease.

**Family Self-Sufficiency Program (FSS Program):** The program established by a housing authority to promote self-sufficiency among participating families, including the coordination of supportive services. (24 CFR 984.103(b))

**Flat Rent:** A rent amount the family may choose to pay in lieu of having their rent determined under the income method. The flat rent is established by the housing authority based on a HUD mandate that it be set at not less than 80% of the FMR, adjusted for tenant-paid utilities. PHAs have the flexibility to conduct reexaminations of family income once every three years instead of annually for families that choose to pay the flat rent. The flat rent amount a family pays is not locked in for the three-year period. Instead, the PHA must revise the flat rent amount from year to year based on the findings of the PHA's rent reasonableness analysis and changes to the FMR.

**Full-Time Student:** A person who is attending school or vocational training on a full-time basis as defined by the institution.

**Gender Identity:** Actual or perceived gender-related characteristics.

**Guest:** Means a person temporarily staying in the unit with the consent of a tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant.

**Head of Household:** The adult member of the family who is the head of the household for purposes of determining income eligibility and rent. (24 CFR 5.504(b))

**Homeless (as defined for 50058 reporting purposes):** An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; or
- b. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by a charitable organizations or by federal, state, or local government programs for low-income individuals); or
- c. An individual who is exiting an institution where he or she 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;

Or

Any individual or family who:

- a. Is fleeing, or is attempting to flee domestic violence, dating violence, sexual assault, Stalking, or other dangerous life-threatening conditions that related to violence against the individuals or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or made the individual or family afraid to return to their primary nighttime residence; and
- b. Has no other residence; and
- c. Lacks the resources or support networks, e.g. family, friends, and faith-based or other social networks, to obtain other permanent housing.

**Household Members:** All members of the household including members of the family, live-in aides, foster children, and foster adults. All household members are listed on the lease, and no one other than household members is listed on the lease.

**Housing Assistance Plan:** A housing plan that is submitted by a unit of general local government and approved by HUD as being acceptable under the standards of 24 CFR 570.

**Immediate Family Member:** a spouse, parent, brother or sister, or child of the person, or an individual to whom that person stands in loco parentis (in place of a parent); or any other person living in the household of that person and related to that person by blood or marriage.

**Imputed Income:** For households with net family assets of more than \$5,000, the amount calculated by multiplying net family assets by a HUD-specified percentage. If imputed income is more than actual income from assets, the imputed amount is used as income from assets in determining annual income.

**Imputed welfare income:** The amount of annual income not actually received by a family, as a result of a welfare benefit reduction for welfare fraud or the failure to comply with economic self-sufficiency requirements, that is nonetheless included in the family's annual income for purposes of determining rent.

**In-Kind Payments:** Contributions other than cash made to the family or to a family member in exchange for services provided or for the general support of the family (e.g., groceries provided on a weekly basis, baby sitting provided on a regular basis).

**Income Method:** A means of calculating a family's rent based on the greater of 10% of

their monthly income, 30% of their adjusted monthly income, the welfare rent, or the minimum rent. Under the income method, rents may be capped by a ceiling rent. Under this method, the family's income is evaluated at least annually.

**Interim (examination):** A reexamination of a family income, expenses, and household composition conducted between the regular annual recertifications when a change in a household's circumstances warrants such a reexamination.

**Law enforcement agency:** The National Crime Information Center (NCIC), police departments and other law enforcement agencies that hold criminal conviction records.

**Live-In Aide:** A person who resides with one or more elderly persons, near-elderly persons, or persons with disabilities and who:

- A. Is determined to be essential to the care and well-being of the persons;
- B. Is not obligated for the support of the persons; and
- C. Would not be living in the unit except to provide the necessary supportive services. (24 CFR 5.403(b))

A live-in aide is not a party to the lease.

**Low-Income Families:** Those families whose incomes do not exceed 80% of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 80% of the median for the area on the basis of HUD's findings that such variations are necessary because of unusually high or low family incomes.

**Medical Expenses:** Medical expenses (of all family members of an elderly or disabled family), including medical insurance premiums, that are anticipated during the period for which annual income is computed and that are not covered by insurance. (24 CFR 5.603(d)). These expenses include, but are not limited to, prescription and non-prescription drugs, costs for doctors, dentists, therapists, medical facilities, care for a service animals, transportation for medical purposes.

**Mixed Family:** A family whose members include those with citizenship or eligible immigration status and those without citizenship or eligible immigration status. (24 CFR 5.504(b))

**Mixed population development:** A public housing development, or portion of a development, that was reserved for elderly and disabled families at its inception (and has



retained that character). If the development was not so reserved at its inception, the PHA has obtained HUD approval to give preference in tenant selection for all units in the development (or portion of development) to elderly families and disabled families. These developments were formerly known as elderly projects.

**Monthly Adjusted Income:** One twelfth of adjusted income. (24 CFR 5.603(d))

**Monthly Income:** One twelfth of annual income. (24 CFR 5.603(d))

**National:** A person who owes permanent allegiance to the United States, for example, as a result of birth in a United States territory or possession. (24 CFR 5.504(b))

**Near-Elderly Family:** A family whose head (including co-head), spouse, or sole member is a person who is at least 50 years of age but below the age of 62; two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62 living with one or more live-in aides. (24 CFR 5.403(b))

**Net Family Assets:**

- a. Net cash value after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.
- b. In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income.
- c. In determining net family assets, housing authorities or owners, as applicable, shall include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received therefor. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant receives important consideration not measurable in dollar terms. (24 CFR 5.603(d))

**Non-Citizen:** A person who is neither a citizen nor national of the United States. (24 CFR 5.504(b))

**Occupancy Standards:** The standards that a housing authority establishes for determining the appropriate number of bedrooms needed to house families of different sizes or composition.

**Other person under the tenant's control:** For the purposes of the definition of covered person it means the person, although not staying as a guest (as defined in this section) in the unit, is, or was at the time of the activity in question, on the premises (as premises is defined in this section) because of an invitation from the tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant. Absent evidence to the contrary, a person temporarily and infrequently on the premises solely for legitimate commercial purposes is not under the tenant's control.

**Participant:** A family or individual that is assisted by the public housing program.

**Permanently absent:** A person or persons not actually residing in the unit who once lived there and does not intend to return. One becomes permanently absent when one vacates the unit.

**Person with Disabilities:** A person who:

- A. Has a disability as defined in 42 U.S.C. 423
- B. Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that:
  1. Is expected to be of long-continued and indefinite duration;
  2. Substantially impedes his or her ability to live independently; and
  3. Is of such a nature that the ability to live independently could be improved by more suitable housing conditions.
- C. Has a developmental disability as defined in 42 U.S.C. 6001.

This definition does not exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome.

For purposes of qualifying for low-income housing, it does not include a person

whose disability is based solely on any drug or alcohol dependence.

**Personally, Identifiable Information (PII):** Information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.

**Premises:** for purposes of the anti-drug provisions of this policy it means the building or complex or development in which the public or assisted housing dwelling unit is located, including common areas and grounds.

**Previously unemployed:** This includes a person who has earned, in the 12 months previous to employment, no more than would be received for 10 hours of work per week for 50 weeks at the established minimum wage.

**Processing Entity:** The person or entity that is responsible for making eligibility and related determinations and an income reexamination. In the Section 8 and public housing programs, the processing entity is the responsibility entity.

**Proration of Assistance:** The reduction in a family's housing assistance payment to reflect the proportion of family members in a mixed family who are eligible for assistance. (24 CFR 5.520)

**Public Housing:** Housing assisted under the 1937 Act, other than under Section 8. Public housing includes dwelling units in a mixed-finance project that are assisted by a PHA with capital or operating funds.

**Public Housing Agency (PHA):** Any State, county, municipality, or other governmental entity or public body (or agency or instrumentality thereof) which is authorized to engage in or assist in the development or operation of low-income housing under the 1937 Housing Act. (24 CFR 5.100)

**Recertification:** The annual reexamination of a family's income, expenses, and composition to determine the family's rent.

**Remaining Member of a Tenant Family:** A member of the family listed on the lease who continues to live in the public housing dwelling after all other family members have left.

**Responsible Entity:**

- A. For the public housing program, the Section 8 tenant-based assistance program (24 CFR 982), and the Section 8 project-based certificate or voucher program (24 CFR 983), and the Section 8 moderate rehabilitation program (24 CFR 882), responsible entity means the PHA administering the program under an ACC with HUD;

- B. For all other Section 8 programs, responsible entity means the Section 8 project owner.

**Self-Declaration:** A type of verification statement by the tenant as to the amount and source of income, expenses, or family composition. Self-declaration is acceptable verification only when third-party verification or documentation cannot be obtained.

**Sensitive Personally Identifiable Information:** PII that when lost, compromised or disclosed without authorization could substantially harm an individual. Examples of sensitive PII include social security or driver's license numbers, medical records, and financial account numbers such as credit or debit card numbers.

**Sexual assault:** any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.

**Sexual Orientation:** Homosexuality, heterosexuality, or bisexuality.

**Shelter Allowance:** That portion of a welfare benefit (e.g., TANF) that the welfare agency designates to be used for rent and utilities.

**Single Person:** Someone living alone or intending to live alone who does not qualify as an elderly family, a person with disabilities, a displaced person, or the remaining member of a tenant family. (Public Housing: Handbook 7465.1 REV-2, 3-5)

**Specified Welfare Benefit Reduction:**

- A. A reduction of welfare benefits by the welfare agency, in whole or in part, for a family member, as determined by the welfare agency, because of fraud by a family member in connection with the welfare program; or because of welfare agency sanction against a family member for noncompliance with a welfare agency requirement to participate in an economic self-sufficiency program.
- B. "Specified welfare benefit reduction" does not include a reduction or termination of welfare benefits by the welfare agency:
1. at the expiration of a lifetime or other time limit on the payment of welfare benefits;
  2. because a family member is not able to obtain employment, even though the family member has complied with welfare agency economic self-sufficiency or work activities requirements; or
  3. because a family member has not complied with other welfare agency requirements.

**Stalking:** to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass,

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## Greensboro Housing Authority

or intimidate; or to place under surveillance with the intent to kill, injure, harass, or intimidate another person; and in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (i) that person; (ii) a member of the immediate family of that person; or (iii) the spouse or intimate partner of that person.

**State Wage Information Collection Agency (SWICA):** The State agency receiving quarterly wage reports from employers in the State or an alternative system that has been determined by the Secretary of Labor to be as effective and timely in providing employment-related income and eligibility information. (24 CFR 5.214)

**Temporarily absent:** A person or persons not actually residing in a unit for a period of time while still maintaining control of the unit. If the absence exceeds **XXX (XXX)** calendar days, the Housing Authority must agree to the absence.

**Temporary Assistance to Needy Families (TANF):** The program that replaced the Assistance to Families with Dependent Children (AFDC) that provides financial assistance to needy families who meet program eligibility criteria. Benefits are limited to a specified time period.

**Tenant:** The person or family renting or occupying an assisted dwelling unit. (24 CFR 5.504(b))

**Tenant Rent:** The amount payable monthly by the family as rent to the housing authority. Where all utilities (except telephone) and other essential housing services are supplied by the housing authority or owner, tenant rent equals total tenant payment. Where some or all utilities (except telephone) and other essential housing services are supplied by the housing authority and the cost thereof is not included in the amount paid as rent, tenant rent equals total tenant payment less the utility allowance. (24 CFR 5.603(d))

**Third-Party (verification):** Written or oral confirmation of a family's income, expenses, or household composition provided by a source outside the household.

### **Total Tenant Payment (TTP):**

A. Total tenant payment for families whose initial lease is effective on or after August 1, 1982:

(1) Total tenant payment is the amount calculated under Section 3(a)(1) of the 1937 Act which is the higher of :

- a. 30% of the family's monthly adjusted income;
- b. 10% of the family's monthly income; or
- c. If the family is receiving payments for welfare assistance from a public

agency and a part of such payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of such payments which is so designated.

- (2) If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under section 3(a)(1) shall be the amount resulting from one application of the percentage.

Total tenant payment for families residing in public housing does not include charges for excess utility consumption or other miscellaneous charges.

**Tuition:** The amount of tuition and required fees covering a full academic year most frequently charged to students. These values represent what a typical student would be charged and may not be the same for all students at an institution. If tuition is charged on a per-credit-hour basis, the average full-time credit hour load for an entire academic year is used to estimate average tuition. Required fees include all fixed sum charges that are required of a large proportion of all students. The student who does not pay the charges is an exception. Verification of tuition and fees can be obtained from the student's bill or annual statement, by contacting the bursar's office, or from the school's website.

Examples of required fees include, but are not limited to, writing and science lab fees and fees specific to the student's major or program (i.e., nursing program).

Expenses related to attending an institution of higher education must **not** be included as tuition. Examples of these expenses include, but are not limited to, room and board, books, supplies, meal plans, transportation and parking, student health insurance plans, and other non-fixed sum charges.

For section 8 programs only, PHAs must include amounts of financial assistance an individual receives in excess of tuition and other required fees and charges when determining annual income.

For the Public Housing program, the full amount of financial assistance a student receives while participating in the program continues to be excluded from the program participant's annual income

- B. Total tenant payment for families residing in public housing whose initial lease was effective before August 1, 1982: Paragraphs (b) and (c) of 24 CFR 913.107, as it existed immediately before November 18, 1996), will continue to govern the total tenant payment of families, under a public housing program, whose initial lease was effective before August 1, 1982.

**Utility Allowance:** If the cost of utilities (except telephone) and other housing services for an assisted unit is not included in the tenant rent but is the responsibility of the family occupying the unit, an amount equal to the estimate made by a housing authority of the monthly cost of a reasonable consumption of such utilities and other services for the unit by an energy-conservative household of modest circumstances consistent with the

requirements of a safe, sanitary, and healthful living environment. (24 CFR 5.603)

**Utility Reimbursement:** The amount, if any, by which the utility allowance for the unit, if applicable, exceeds the total tenant payment for the family occupying the unit. (24 CFR 5.603)

**VAWA:** The Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162, approved August 28, 2006), as amended by the U.S. Housing Act of 1937 (42 U.S.C. 1437d and 42 U.S. 1437f).

**Very Low-Income Families:** Families whose incomes do not exceed 50% of the median family income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 50% of the median for the area if HUD finds that such variations are necessary because of unusually high or low family incomes.

**Violent criminal activity:** means any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage. Arrest alone is not sufficient evidence of criminal activity.

**Welfare Assistance:** Welfare or other payments to families or individuals, based on need, that are made under programs funded, separately or jointly, by Federal, State or local governments (including assistance provided under the Temporary Assistance for Needy Families (TANF) program, as that term is defined under the implementing regulations issued by the Department of Health and Human Services at 45 CFR 260.31). 45 CFR 260.31 defines the term “assistance” to include cash, payments, vouchers, and other forms of benefits designed to meet a family's ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses).

It includes such benefits even when they are:

- A. Provided in the form of payments by a TANF agency, or other agency on its behalf, to individual recipients; and
- B. Conditioned on participation in work experience or community service (or any other work activity under 45 CFR 261.30).

Except where excluded later in this definition, it also includes supportive services such as transportation and childcare provided to families who are not employed.

The term “assistance” excludes:

- A. Nonrecurring, short-term benefits that:
  - 1. Are designed to deal with a specific crisis situation or episode of need;
  - 2. Are not intended to meet recurrent or ongoing needs; and

- 3. Will not extend beyond four months.
  
- B. Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);
- C. Supportive services such as child care and transportation provided to families who are employed;
- D. Refundable earned income tax credits;
- E. Contributions to, and distributions from, Individual Development Accounts;
- F. Services such as counseling, case management, peer support, childcare information and referral, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support; and
- G. Transportation benefits provided under a Job Access or Reverse Commute project, pursuant to section 404(k) of the Act, to an individual who is not otherwise receiving assistance.

**Welfare Rent:** In "as-paid" welfare programs, the amount of the welfare benefit designated for shelter and utilities.

**Written notification:** All written notifications required in this policy shall be hand delivered with a signed receipt or mailed via first class mail unless specified otherwise.

**Acronyms**

ACC	Annual Contributions Contract
CFR	Code of Federal Regulations
FSS	Family Self Sufficiency (program)
HCDA	Housing and Community Development Act
HQS	Housing Quality Standards
HUD	Department of Housing and Urban Development
INS	(U.S.) Immigration and Naturalization Service
NAHA	(Cranston-Gonzalez) National Affordable Housing Act
NOFA	Notice of Funding Availability



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OMB (U.S.) Office of Management and Budget

PHA Public Housing Agency

QHWRA Quality Housing and Work Responsibility Act of 1998

SSA Social Security Administration

TTP Total Tenant Payment

**HOUSING CHOICE VOUCHER PROGRAM  
ADMINISTRATIVE PLAN  
2024**

**Greensboro Housing Authority, Greensboro, North Carolina**

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# HOUSING CHOICE VOUCHER PROGRAM ADMINISTRATIVE PLAN

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## EQUAL OPPORTUNITY

### 1.0 FAIR HOUSING

It is the policy of the Greensboro Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws; the Americans with Disabilities Act; and the U.S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity.

No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, disability, marital status, gender identity, or sexual orientation be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the Greensboro Housing Authority Housing Choice Voucher Programs.

No inquiries shall be made about a person's sexual orientation or gender identity. However, the Greensboro Housing Authority may inquire about a person's sex in order to determine the number of bedrooms a household may be eligible for under the occupancy standards or to accurately complete HUD's 50058.

To further its commitment to full compliance with applicable Civil Rights laws, the Greensboro Housing Authority will provide Federal/State/local information to applicants for and tenants in the Housing Choice Voucher Program (HCVP) regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. Such information will be made available with the application, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made available at the Greensboro Housing Authority office. In addition, all appropriate written information and advertisements will contain the appropriate Equal Opportunity language and logo.

The Greensboro Housing Authority will assist any family that believes they have suffered illegal discrimination by providing them copies of the housing discrimination form. The Greensboro Housing Authority will also assist them in completing the form, if requested, and will provide them with the address of the nearest HUD Office of Fair Housing and Equal Opportunity. The Greensboro Housing Authority will keep records of all complaints, investigations, notices and corrective actions for five years.



## **1.1 REASONABLE ACCOMMODATION**

Sometimes people with disabilities may need a reasonable accommodation in order to take full advantage of the Greensboro Housing Authority's Housing Choice Voucher Programs and related services. When such accommodations are granted, they do not confer special treatment or advantage for the person with a disability; rather, they make the program fully accessible to them in a way that would otherwise not be possible due to their disability. The Reasonable Accommodation procedure clarifies how people can request accommodations and the guidelines the Greensboro Housing Authority will follow in determining whether it is reasonable to provide a requested accommodation. Because disabilities are not always apparent, the Greensboro Housing Authority will ensure that all applicants/tenants are aware of the opportunity to request reasonable accommodations.

Legitimate reasonable accommodation requests shall be granted if possible and not an undue financial and administrative burden to the Greensboro Housing Authority. If the request is contrary to a HUD regulatory requirement and not an undue burden, the Greensboro Housing Authority shall request a waiver of requirement from HUD.

## **1.2 VERIFICATION OF ACCOMMODATION REQUEST**

Greensboro Housing Authority is entitled to obtain information that is necessary to evaluate if a requested reasonable accommodation may be necessary because of a disability.

- A. If the requester's disability is obvious, or otherwise known to the provider, and if the need for the requested accommodation is also readily apparent or known, Greensboro Housing Authority will not request any additional information.
- B. If the requestor's disability is obvious, but the need for the accommodation is not readily apparent or known, Greensboro Housing Authority may request information that is necessary to evaluate the disability related need for the accommodation.
- C. If the requestor's disability is not obvious, Greensboro Housing Authority may request reliable disability-related information that (1) is necessary to verify that the person meets the Fair Housing Act's definition of disability (i.e., has a physical or mental impairment that substantially limits one or more major life activities), (2) describes the needed accommodation, and (3) shows the relationship between the person's disability and the need for the requested information.

## **1.3 COMMUNICATION**

All residents or their caretakers will be provided the Request for Reasonable Accommodation Form when requested. A resident may submit the request in writing, orally, or may use another equally effective means of communication to request the accommodation. All decisions granting or denying requests for reasonable accommodations will be in writing and provided to the family within 30 days after the date upon which the request is submitted, or if applicable within 30 days after the date upon which any additional information or verification reasonably necessary for GHA's decision

is provided. The notice will inform the family of the right to appeal the housing authority's decision. Reasonable accommodations may be verified on an annual basis.

Notifications of reexamination, inspection, appointment, or termination of assistance will include information about requesting a reasonable accommodation. Any notification requesting action by the tenant will include information about requesting a reasonable accommodation.

#### **1.4 SERVICES FOR NON-ENGLISH-SPEAKING PERSONS**

The Greensboro Housing Authority is interested, within reason, in assisting persons with limited English proficiency (LEP). This shall be accomplished by assessing the need of LEP persons using four factors. GHA shall balance these factors in deciding what to do:

- A. The number or proportion of LEP persons served or encountered in the eligible service area;
- B. The frequency with which LEP individuals come in contact with the program.
- C. The nature and importance of the program, activity, or service provided by the program; and
- D. The resources available to GHA and costs.

#### **1.5 FAMILY/OWNER OUTREACH**

The Greensboro Housing Authority will publicize the availability and nature of the Housing Choice Voucher Program for extremely low-income and very low-income families in a newspaper of general circulation, minority media, and by other suitable means.

The Greensboro Housing Authority will communicate the status of program availability to other service providers in the community and advise them of housing eligibility factors and guidelines so that they can make proper referral of their clients to the program.

The objective of this effort is to develop a waiting list that is representative of our low-income community. A particular emphasis will be placed on attracting eligible individuals and families least likely to apply for the Housing Choice Voucher Program.

The Greensboro Housing Authority will hold briefings for owners who participate in or who are seeking information about the HCVP. The briefings are intended to:

- A. Explain how the program works;
- B. Explain how the program benefits owners;
- C. Explain owners' responsibilities (including lead-based paint) under the program. Emphasis is placed on quality screening and ways the Greensboro Housing Authority helps owners do better screening; and

- D. Provide an opportunity for owners to ask questions, obtain written materials, and meet Greensboro Housing Authority's staff.

The Greensboro Housing Authority will particularly encourage owners of suitable units located outside of low-income or minority concentration and owners of accessible units to attend. Targeted mailing lists will be developed, and announcements mailed.

### **1.6 RIGHT TO PRIVACY**

All adult members of both applicant and tenant households are required to annually sign HUD Form 9886, *Authorization for Release of Information and Privacy Act Notice*. The *Authorization for Release of Information and Privacy Act Notice* states how family information will be released and includes the *Federal Privacy Act Statement*.

Any request for applicant or tenant information will not be released unless there is a signed release of information request from the applicant or tenant. This includes transmitting data to a Receiving Housing Authority under Portability.

### **1.7 REQUIRED POSTINGS**

The Greensboro Housing Authority will post in the main office in a conspicuous place and at a height easily read by all persons including persons with mobility disabilities, the following information:

- A. The HCVP Administrative Plan
- B. Notice of the status of the waiting list (opened or closed)
- C. Address of all Greensboro Housing Authority offices, office hours, telephone numbers, TDD numbers, and hours of operation
- D. Income Limits for Admission
- E. Informal Review and Informal Hearing Procedures
- F. Fair Housing Poster
- G. Equal Opportunity in Employment Poster

## **2.0 GREENSBORO HOUSING AUTHORITY/OWNER RESPONSIBILITY/ OBLIGATION OF THE FAMILY**

This Section outlines the responsibilities and obligations of the Greensboro Housing Authority, the Section 8 Owners/Landlords, and the participating families.

## **2.1 GREENSBORO HOUSING AUTHORITY RESPONSIBILITIES**

- A. The Greensboro Housing Authority will comply with the consolidated ACC, the application, HUD regulations and other requirements, and the Greensboro Housing Authority's HCVP Administrative Plan.
- B. In administering the program, the Greensboro Housing Authority will:
  - 1. Publish and disseminate information about the availability and nature of housing assistance under the program;
  - 2. Explain the program to owners and families;
  - 3. Seek expanded opportunities for assisted families to locate housing outside areas of poverty or racial concentration;
  - 4. Encourage owners to make units available for leasing in the program, including owners of suitable units located outside areas of poverty or racial concentration;
  - 5. Affirmatively further fair housing goals and comply with equal opportunity requirements;
  - 6. Make efforts to help people with disabilities find satisfactory housing through our partnerships with advocates for people with disabilities;
  - 7. Receive applications from families, determine family eligibility, maintain the waiting list, select applicants, issue a housing choice voucher to each selected family, and provide housing information to families selected;
  - 8. Determine who can live in the assisted unit at admission and during the family's participation in the program;
  - 9. Obtain and verify evidence of citizenship and eligible immigration status in accordance with 24 CFR part 5;
  - 10. Review the family's request for approval of the tenancy and the owner/landlord lease, including the HUD prescribed tenancy addendum;
  - 11. Inspect the unit before the assisted occupancy begins and at least annually during the assisted tenancy;
  - 12. Determine the amount of the housing assistance payment for a family;
  - 13. Determine the maximum rent to the owner and whether the rent is reasonable;
  - 14. Make timely housing assistance payments to an owner in accordance with

the HAP contract;

15. Examine family income, size and composition at admission and at least annually during the family's participation in the program. The examination includes verification of income and other family information;
16. Establish and adjust the Greensboro Housing Authority utility allowance;
17. Administer and enforce the housing assistance payments contract with an owner, including taking appropriate action as determined by the Greensboro Housing Authority, if the owner defaults (e.g., HQS violation);
18. Determine whether to terminate assistance to a tenant family for violation of family obligations;
19. Conduct informal reviews of certain Greensboro Housing Authority decisions concerning applicants for participation in the program;
20. Conduct informal hearings on certain Greensboro Housing Authority decisions concerning tenant families;
21. Provide sound financial management of the program, including engaging an independent public accountant to conduct audits;
22. Administer an FSS program; and
23. Electronically submit form HUD 50058.

## **2.2 OWNER RESPONSIBILITY**

- A. The owner is responsible for performing all of the owner's obligations under the HAP contract and the lease.
- B. The owner is responsible for:
  1. Performing all management and rental functions for the assisted unit, including selecting a housing choice voucher holder to lease the unit, and deciding if the family is suitable for tenancy of the unit (screening the tenant).
  2. Maintaining the unit in accordance with HQS, including performance of ordinary and extraordinary maintenance.
  3. Complying with equal opportunity requirements.
  4. Complying with the Housing Assistance Program contract (HAP).

5. Preparing and furnishing to the Greensboro Housing Authority information required under the HAP contract.
  6. Collecting from the family:
    - a. Any security deposit required under the lease.
    - b. The tenant contribution (the part of rent to owner not covered by the housing assistance payment).
    - c. Any charges for unit damage by the family.
  7. Entering into a lease and enforcing tenant obligations under the lease.
  8. Including in the lease a clause that provides that engaging in drug-related criminal activity on or near the premises by the tenant, household member, guest, or any person under the tenant's control is grounds for the owner to terminate tenancy. In addition, the lease must also provide that the owner may evict a family when the owner determines that a household member is illegally using a drug or when the owner determines that a pattern of illegal use of a drug interferes with the health, safety, or right to peaceful enjoyment of the premises by other tenants.
  9. Paying for utilities and services (unless paid by the family under the lease.)
- C. For provisions on modifications to a dwelling unit occupied or to be occupied by a person with disabilities (see 24 CFR 100.203) as reasonable accommodation.
- D. The owner is responsible for notifying the Greensboro Housing Authority sixty (60) calendar days prior to any rent increase.

### **2.3 OBLIGATIONS OF THE PARTICIPANT**

This Section states the obligations of a tenant family under the program.

#### **A. Supplying required information.**

The family must supply any information that the Greensboro Housing Authority or HUD determines is necessary in the administration of the program, including submission of required evidence of citizenship or eligible immigration status.

Information includes any requested certification, release or other documentation.

The family must supply any information requested by the Greensboro Housing Authority or HUD for use in a regularly scheduled reexamination or interim

reevaluation of family income and composition in accordance with HUD requirements.

The family must disclose and verify Social Security Numbers and must sign and submit consent forms for obtaining information.

All information supplied by the family must be true and complete.

B. Responsible for specific HQS breaches

C. Allowing Greensboro Housing Authority Inspection

The family must allow the Greensboro Housing Authority to inspect the unit at reasonable times and after at least 2-calendar days' notice.

D. Violation of Lease

The family may not commit any serious or repeated violation of the lease.

E. Family Notice of Move or Lease Termination

The family must notify the Greensboro Housing Authority and the owner before the family moves out of the unit or terminates the lease by a notice to the owner.

F. Owner Eviction Notice

The family must promptly give the Greensboro Housing Authority a copy of any owner eviction notice it receives.

G. Use and Occupancy of the Unit

1. The family must use the assisted unit for a residence by the family. The unit must be the family's only residence.
2. The Greensboro Housing Authority must approve the composition of the assisted family residing in the unit. The family must inform the Greensboro Housing Authority within ten (10) business days of the birth, adoption or court-awarded custody of a child.
3. The family must request approval from the Greensboro Housing Authority to add additional family member(s) to an occupied unit. GHA will not approve the addition of a new family member or household member unless the individual meets the eligibility criteria and the required documentation is received.
4. The family must notify the Greensboro Housing Authority within ten (10)

business days if any family member no longer resides in the unit.

5. If the Greensboro Housing Authority has given approval, a foster child/foster adult or a live-in aide may reside in the unit. The Greensboro Housing Authority has the discretion to adopt reasonable policies concerning residence by a foster child/foster adult or a live-in aide and defining when the Greensboro Housing Authority consent may be given or denied.
6. Members of the household may engage in legal profit-making activities in the unit, but only if such activities are incidental to primary use of the unit for residence by members of the family. Any business uses of the unit must comply with the lease, zoning requirements and the affected household member must obtain all appropriate licenses.
7. The family must not sublease or let the unit.
8. The family must not assign the lease or transfer the unit.

#### H. Absence from the Unit

The family must supply any information or certification requested by the Greensboro Housing Authority to verify that the family is living in the unit, or relating to family absence from the unit, including any Greensboro Housing Authority requested information or certification on the purposes of family absences. The family must cooperate with the Greensboro Housing Authority for this purpose. The family must promptly notify the Greensboro Housing Authority of its absence from the unit.

Absence means that no member of the family is residing in the unit. The family may be absent from the unit for up to 30 calendar days. The family must request permission from the Greensboro Housing Authority for absences exceeding 30 calendar days. The Greensboro Housing Authority will make a determination within 5 business days of the request. An authorized absence may not exceed 180 calendar days. Any family absent for more than 30 calendar days without authorization will be terminated from the program.

Authorized absences may include but are not limited to:

1. Prolonged hospitalization
2. Absences beyond the control of the family (i.e., death in the family, other family member illness)
3. Other absences that are deemed necessary by the Greensboro Housing Authority

#### I. Interest in the Unit



The family may not own or have any interest in the unit (except for owners of manufactured housing renting the manufactured home space or people using a housing choice voucher to purchase a home).

#### **J. Fraud and Other Program Violation**

The members of the family must not commit fraud, bribery, or any other corrupt or criminal act in connection with the program.

#### **K. Crime by Family Members**

The members of the family may not engage in drug-related criminal activity, other violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises. The use of medical marijuana is included in this ban.

#### **L. Other Housing Assistance**

An assisted family, or members of the family, may not receive HCVP tenant-based assistance while receiving another housing subsidy, for the same unit or for a different unit, under any duplicative (as determined by HUD or in accordance with HUD requirements) Federal, State or local housing assistance program.

#### **M. Alcohol and/or Drug Abuse by Household Members**

The members of the household must not abuse alcohol and/or drugs in a way that threatens the health, safety, or right to peaceful enjoyment of other tenants and/or persons residing in the immediate vicinity of the premises.

### **3.0 ELIGIBILITY FOR ADMISSION**

#### **3.1 INTRODUCTION**

There are five eligibility requirements for admission to the Housing Choice Voucher Program (HCVP): (1) qualifies as a family; (2) has an income within the income limits; (3) meets citizenship/eligible immigrant criteria; (4) provides documentation of Social Security Numbers, and (5) signs consent authorization documents. In addition to the eligibility criteria, families must also meet the Greensboro Housing Authority screening criteria in order to be admitted to the HCVP.

#### **3.2 ELIGIBILITY CRITERIA**

Applicants and participants (including each member of the household and including, live-in aides, foster children, and foster adults) are required to disclose his/her SSA-assigned

SSN. The best verification of the Social Security Number is the original Social Security card. If the card is not available, the Greensboro Housing Authority will accept letters from Social Security that establish and state the number. Documentation from other governmental agencies will also be accepted that establish and state the number. Driver's license, military ID, passports, or other official documents that establish and state the number are also acceptable.

If individuals state that they do not have a Social Security Number, they will be required to sign a statement to this effect. An adult must sign for minor children. The Greensboro Housing Authority will not require any individual who does not have a Social Security Number to obtain a Social Security Number.

If a member of an applicant family indicates they have a Social Security Number, but cannot readily verify it, the family cannot be assisted until verification is provided.

If a member of a participating family indicates they have a Social Security Number, but cannot readily verify it, they shall be asked to certify to this fact and shall have up to 90 calendar days to provide the verification. If the individual is at least 62 years of age, they will be given 90 calendar days to provide the verification. If the individual fails to provide the verification within the time allowed, the family will be removed from the waiting list or will have their assistance terminated.

A. Family status –all families must have a Head of Household or Co-Head of Household. Family includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

1. A **family with or without children**. Such a family is defined as a group of people related by blood, marriage, adoption or affinity (regardless of actual or perceived sexual orientation, gender identity, or marital status) that lives together in a stable family relationship and share resources.

a. Children temporarily absent from the home due to placement in foster care are considered family members.

b. Unborn children and children in the process of being adopted are considered family members for purposes of determining bedroom size but are not considered family members for determining income limit.

2. An **elderly family** is:

a. A family whose head (including co-head), spouse, or sole member is a person who is at least 62 years of age;

b. Two or more persons who are at least 62 years of age living together;  
or

c. One or more persons who are at least 62 years of age living with one

or more live-in aides.

3. A **near-elderly family** is:
  - a. A family whose head (including co-head) and spouse, or sole member is at least 50 years of age but below the age of 62;
  - b. Two or more persons who are at least 50 years of age but below the age of 62 living together; or
  - c. One or more persons who are at least 50 years of age but below the age of 62 living with one or more live-in aides.
4. A **disabled family** is:
  - a. A family whose head (including co-head), spouse, or sole member is a person with disabilities;
  - b. Two or more persons with disabilities living together; or
  - c. One or more persons with disabilities living with one or more live-in aides.
  - d. For purposes of qualifying for low-income housing, does not include a person whose disability is based solely on any drug or alcohol dependence.
5. A **displaced family** is a family in which each member, or whose sole member, has been displaced by governmental action, or whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws.
6. This includes individuals or families who have received a written condemnation notice from the City of Greensboro indicating condemnation of their rental unit is imminent. Renters who damage the rental home or are otherwise responsible for causing the condemnation, are not eligible for this preference.
7. A **remaining member of a tenant family** is a family member of an assisted family who remains in the unit when other family members have left the unit. GHA will approve a temporary guardian to move into the unit after the individual has been screened for suitability for the program. GHA will work with the Department of Social Services as necessary.
8. A **single person** who is not an elderly or displaced person, or a person with

disabilities, or the remaining member of a tenant family.

B. Income eligibility

1. To be eligible to receive assistance a family shall, at the time the family initially receives assistance under the HCVP, be a family that is:
  - An extremely low income or a very low-income family;
  - A low-income family continuously assisted under the 1937 Housing Act, including families relocated from public housing for the convenience of the agency (continuously assisted families are not counted against the income targeting requirements);
  - A low-income family that meets additional eligibility criteria specified by the Housing Authority;
  - A low-income family that is a non-purchasing tenant in a HOPE 1 or HOPE 2 project or a property subject to a tenant homeownership program under 24 CFR 248.173;
  - A low-income family or moderate-income elderly/disabled family that is displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing;
2. Income limits apply only at admission and are not applicable for continued occupancy; however, as income rises, the assistance will decrease.
3. The applicable income limit for issuance of a housing choice voucher is the highest income limit for the family size for areas within the housing authority's jurisdiction.

The applicable income limit for admission to the program is the income limit for the area in which the family is initially assisted in the program. The family may only use the housing choice voucher to rent a unit in an area where the family is income eligible at admission to the program.

4. Families who are moving into the Greensboro Housing Authority's jurisdiction under portability and have the status of applicant rather than of tenant at their initial housing authority must meet the income limit for the area where they are initially assisted under the program.
5. Families who are moving into the Greensboro Housing Authority's jurisdiction under portability and are already program tenants at their initial housing authority do not have to meet the income eligibility requirement for the Greensboro Housing Authority program.

6. Income limit restrictions do not apply to families transferring units within the Greensboro Housing Authority Housing Choice Voucher Program.

C. Citizenship/Eligible Immigrant status

To be eligible for a housing choice voucher at least one member of the family must be a citizen, national, or a non-citizen who has eligible immigration status under one of the categories set forth in Section 214 of the Housing and Community Development Act of 1980 (see 42 U.S.C. 1436a(a)) or a citizen of the Republic of Marshall Islands, the Federated States of Micronesia, or the Republic of Palau. However, people in the last category are not entitled to housing assistance in preference to any United States citizen or national tenant within Guam.

Family eligibility for assistance

1. A family shall not be eligible for assistance unless at least one member of the family residing in the unit is determined to have eligible status, with the exception noted below.
2. Despite the ineligibility of one or more family members, a mixed family may be eligible for one of three types of assistance (See Section 11.4(E) for calculating rents under the non-citizen rule).
3. A family without any eligible members and receiving assistance on June 19, 1995, may be eligible for temporary deferral of termination of assistance.

D. Social Security Number Documentation

1. To be eligible, all family members must provide a Social Security Number (including each member of the household and including, live-in aides, foster children, and foster adults). Refusal to provide a Social Security number or a certification renders an applicant ineligible to participate in the program. Adults must certify for minors.
2. If applicants indicate they have a Social Security number but cannot readily verify the number, the family cannot be assisted until verification is provided and shall be given sixty (60) days to provide the verification.
3. If a person is already a program participant and has not disclosed his or her Social Security Number, it must be disclosed at the next re-examination or re-certification or no later than 60 days after being notified by GHA. If verification is not provided within the time allowed, the family should be denied admission or may have their assistance terminated.
4. If the Social Security card is not available, GHA will accept letters from the

Social Security Administration that establish and state the number. Documentation from other governmental agencies will also be accepted that establishes and states the number. A driver's license, military ID, passport, or other official documents that establishes and states the number is also acceptable.

5. GHA will use the Public and Indian Housing information Center (PIC) Tenant ID Management tool to generate a unique identifier (commonly referred to as an alternate ID) for those individuals who have not been assigned an SSN.
6. Participants aged 62 or older as of January 31, 2010, whose initial eligibility determination was begun before January 31, 2010, are exempt from the required disclosure of their Social Security Number. This exemption continues even if the individual moves to a new assisted unit.

E. Signing Consent Forms

- A. In order to be eligible each member of the family who is at least 18 years of age, and each family head and spouse regardless of age, shall sign one or more consent forms.
  1. The consent form must contain, at a minimum, the following:
    - a. A provision authorizing HUD and the Greensboro Housing Authority to obtain from State Wage Information Collection Agencies (SWICAs) any information or materials necessary to complete or verify the application for participation or for eligibility for continued occupancy;
    - b. A provision authorizing HUD or the Greensboro Housing Authority to verify with previous or current employers or other sources of income information pertinent to the family's eligibility for or level of assistance;
    - c. A provision authorizing HUD to request income information from the IRS and the SSA for the sole purpose of verifying income information pertinent to the family's eligibility or level of benefits;
    - d. A statement allowing the Greensboro Housing Authority permission to access the applicant's criminal record with any and all police and/or law enforcement agencies; and
    - e. A statement that the authorization to release the information requested by the consent form expires 15 months after the date the consent form is signed.

F. Suitability for tenancy

The Greensboro Housing Authority determines eligibility for participation and will also conduct criminal background checks on all household members, 18 years and older including live-in aides. The Greensboro Housing Authority will deny assistance to a family because of drug-related criminal activity or violent criminal activity by family members. This check will be made through state or local law enforcement or court records in those cases where the household member has lived in the local jurisdiction for the last three years. If the individual has lived outside the local area, the Greensboro Housing Authority may contact law enforcement agencies where the individual had lived or request a check through the FBI's National Crime Information Center (NCIC). New admissions of medical marijuana users are prohibited (this does not include FDA-approved marijuana synthetics). HUD has ruled that federal law preempts state law on this issue. In deciding whether to exercise their discretion to assist an individual or household that has engaged in criminal activity, the Greensboro Housing Authority will consider all of the circumstances relevant to the particular admission or eviction decision, including but not limited to: the seriousness of the offending action; the effect that the denial of assistance of the entire household would have on family members not involved in the criminal activity; and the

extent to which the participant has taken all reasonable steps to prevent or mitigate the criminal activity.

The Greensboro Housing Authority will check with the State sex offender registration program and will ban for life any individual who is registered as a lifetime sex offender or any individual currently on the registry. The Greensboro Housing Authority will check with our state registry and if the applicant has resided in another State(s), with that State(s)'s list. The Greensboro Housing Authority will utilize the US Department of Justice's Dru Sjodin National Sex Offender website as an additional resource. The Dru Sjodin National Sex Offender Database is an online, searchable database, hosted by the Department of Justice, which combines the data from individual state sex offender registries.

If an applicant is about to be denied housing based on either the criminal check or the sex offender registration program, the applicant will be informed of this fact and given an opportunity to dispute the accuracy of the information before the denial or eviction occurs. Applicants that are denied housing will be given a "Notice of Occupancy Rights under the Violence Against Women Act" which provides information on their rights and responsibilities under the Violence Against Women Act (VAWA). A copy of the HUD-approved Certification form shall also be provided with the notice.

G. Special College Student Eligibility Rules

No assistance shall be provided under HCVP of the 1937 Act to any individual student who:

1. Is enrolled as a student at an institution of higher education, as defined under section 102 of the Higher Education Act of 1965 (20 U.S.C. 1002);
2. Is under 24 years of age;
3. Is not a veteran of the United States military;
4. Is unmarried;
5. Does not have a dependent child; and
6. Is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible on the basis of income to receive assistance under HCVP of the 1937 Act.

The above restriction does not apply to a person with disabilities as such term is defined in section 3(b)(3)(E) of the 1937 ACT and who was receiving Section 8 assistance on November 20, 2005.

A student, under the age of 24 may still be income eligible for assistance in circumstances where the student can demonstrate independence from parents, where the student can demonstrate the absence of parents, or where an examination of the student's parents' income may not be relevant.

1. The individual is of legal contract age under state law.
2. The individual has established a household separate from parents or legal guardians for at least one year prior to application for occupancy or the individual meets the U.S. Department of Education's definition of an "independent student." Section 480(d) of the Higher Education Act of 1965, as amended (the HEA), 20 U.S.C. 1087vv(d).
3. The individual is not claimed as a dependent by parents or legal guardians pursuant to IRS regulations.
4. The individual obtains a certification of the amount of financial assistance that will be provided by parents, signed by the individual providing the support, even if no assistance will be provided.

The Greensboro Housing Authority will verify to determine whether a student is independent for purposes of using the student's income alone for determining Section 8 eligibility (Student's Independence Verification Requirements). Those items include:

1. Reviewing and verifying previous address information to determine evidence



- of a separate household;
- 2. Verifying the student meets the U.S. Department of Education’s definition of “independent student”;
- 3. Reviewing a student’s prior year income tax returns to verify the student is independent or verifying the student meets the U.S. Department of Education’s definition of “independent student”; and
- 4. Verifying income provided by a parent by requiring a written certification from the individual providing the support. Certification is also required if the parent is providing no support to the student. Financial assistance that is provided by persons not living in the unit is part of annual income. (Except if the student meets the Department of Education’s definition of “independent student” in paragraphs (2), (3) or (8) set forth below).

An “independent student” is defined as:

- 1. The individual is 24 years of age or older by December 31 of the award year;
- 2. The individual is an orphan, in foster care, or a ward of the court or was an orphan, in foster care, or a ward of the court at any time when the individual was 13 years of age or older;
- 3. The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual’s State of legal residence;
- 4. The individual is a veteran of the Armed Forces of the United States (as defined in subsection c) (1) of HEA) or is currently serving on active duty in the Armed Forces for other than training purposes;
- 5. The individual is a graduate or professional student;
- 6. The individual is a married individual;
- 7. The individual has legal dependents other than a spouse;
- 8. The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth (as such terms are defined in section 725 of the McKinney-Vento Homeless Assistance Act) (42 U.S.C. 11431 et seq.), or as unaccompanied, at risk of homelessness, and self-supporting, by—
  - a. A local educational agency homeless liaison, designated pursuant to section 722(g)(1)(J)(ii) of the
  - b. McKinney-Vento Homeless Assistance Act;
  - c. The director of a program funded under the Runaway and Homeless Youth Act or a designee of the director;
  - d. The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (relating to emergency shelter grants) or a designee of the director; or
  - e. A financial aid administrator; or
  - f.
- 9. The individual is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances.

## H. Violence Against Women

No applicant who has been a victim of domestic violence, dating violence, sexual assault, or stalking shall be denied admission into the program if they are otherwise qualified and can provide certification per GHA's Violence Against Women policy.

## 4.0 MANAGING THE WAITINGLIST

### 4.1 *OPENING AND CLOSING THE WAITINGLIST*

Opening of the waiting list will be announced via public notice that applications for the HCVP will again be accepted. The public notice will state where, when, and how to apply. The notice will be published in a local newspaper of general circulation, and also by any available minority media. The public notice will state any limitations to who may apply.

Closing of the waiting list will be announced via public notice. The public notice will state the date the waiting list will be closed. The public notice will be published in a local newspaper of general circulation, and also by any available minority media.

### 4.2 *TAKING APPLICATIONS*

Families wishing to apply for the HCVP will be required to complete an application for housing assistance. Applicants will be required to complete HUD Form 92006 with their application. Applications shall be completed electronically, available on GHA's website [www.gha-nc.org](http://www.gha-nc.org).

Applications are taken to compile a waiting list. Due to the demand for HCVP assistance in the Greensboro Housing Authority jurisdiction, the Greensboro Housing Authority may take applications on an open enrollment basis, depending on the length of the waiting list.

GHA will accept application for Assisted Housing and the Supplement Application for Federally Assisted Housing (HUD-92006). Exceptions may be granted in emergency situations (i.e., fire, natural disaster) by supervisory staff. Applications will not be processed if they do not meet advertised preferences.

If the applicant chooses to have more than one contact person or organization, the applicant must make clear to the Housing Authority the reason each person or organization may be contacted. GHA will require the applicant to complete a form HUD-92006 for each contact and indicate the reason GHA may contact the individual or organization. For example, the applicant may choose to have a relative as a contact for emergency purposes and an advocacy organization for assistance for tenancy purposes. Those applicants who choose not to provide the contact information should check the box indicating that they "choose not to provide the contact information" and sign and date the form.

GHA will follow its Reasonable Accommodation policy to address accommodations

requests from elderly and disabled applicants.

Persons with disabilities who require a reasonable accommodation in completing an application may call the Greensboro Housing Authority to make special arrangements to complete their application. A Telecommunication Device for the Deaf (TDD) is available for the deaf. The TDD telephone number is 711 for free interpreters.

The application process will involve two phases. The first phase is the initial application for housing assistance or the pre-application. The pre-application requires the family to provide limited basic information including name, address, phone number, family composition and family unit size, racial or ethnic designation of the head of household, income category, and information establishing any preferences to which they may be entitled. This first phase results in the family's placement on the waiting list if deemed apparently eligible.

The second phase is the final determination of eligibility, referred to as the full application. The full application takes place when the family nears the top of the waiting list.

GHA will ensure that verification of all preferences, eligibility, and suitability selection factors are current in order to determine the family's final eligibility for admission into the HCVP.

Applicants will also be given the opportunity to update their HUD Form 92006 if applicable and if they so desire.

#### **4.3 ORGANIZATION OF THE WAITING LIST**

The waiting list will be maintained in accordance with the following guidelines:

- A. The application will be a permanent file;
- B. Any significant contact between the Greensboro Housing Authority and the applicant will be documented in the YARDI system.

All files (applicant or tenant) shall be retained for three years from the date the file is closed, whether this is due to the surrender of a housing choice voucher or the removal of a person from the waiting list, whichever is later. If a tenant has an outstanding balance with the Housing Authority, their file is retained indefinitely.

Note: The waiting list cannot be maintained by bedroom size under current HUD regulations.

#### **4.4 PURGING THE WAITING LIST**

The Greensboro Housing Authority will update and purge its waiting list at least annually to ensure that the pool of applicants reasonably represents interested families. Purging also

enables the Housing Authority to update the information regarding address, family composition, income category and preferences. An applicant family will be allowed 10 business days to respond to the waiting list update.

#### **4.5 REMOVAL OF APPLICANTS FROM THE WAITINGLIST**

The Greensboro Housing Authority will not remove an applicant's name from the waiting list unless:

- A. The applicant requests that the name be removed;
- B. The applicant fails to respond to a written request for information or a request to declare their continued interest in the program or misses scheduled appointments;
- C. The applicant does not meet either the eligibility or screening criteria for the program;
- D. The applicant has been issued a Housing Choice voucher; or
- E. The applicant missed a scheduled appointment.

The reason for all removals from the waiting list shall be carefully documented in the applicant's file and retained for three years from the date the file is closed.

#### **4.6 GROUNDS FOR DENIAL**

The Greensboro Housing Authority will deny assistance to applicants who:

- A. Fail to sign and submit consent forms for obtaining information;
- B. Have a family member who was evicted from federally assisted housing within the past five (5) years because of drug-related criminal activity. However, the Greensboro Housing Authority may admit the household if the PHA determines:
  - 1. The evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program approved by the Greensboro Housing Authority; or
  - 2. The circumstances leading to the eviction no longer exist (for example, the criminal household member is imprisoned or has died).
- C. Have a member who is currently engaging in illegal use of a drug;
- D. Have a household member whose illegal drug use and/or abuse of alcohol or a pattern of illegal drug use and/or abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other tenants;

- E. Have a household member who has ever been convicted of drug-related criminal activity for the manufacture or production of methamphetamine on the premises of federally assisted housing;
- F. Have a household member who is subject to a lifetime registration requirement under a State sex offender registration program or is currently registered;
- G. Do not provide complete, true and accurate information to GHA;
- H. Currently owes rent or other amounts to the Greensboro Housing Authority or to another Housing Authority in connection with HCVP or public housing assistance under the 1937 Act and have not reimbursed any Housing Authority for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease;
- I. Have a household member who is a fugitive felon, parole violator or person fleeing to avoid prosecution, or custody or confinement after conviction, for a crime, or attempt to commit a crime, that is a felony under the laws of the place from which the individual flees;
- J. Have a household member who is currently engaged in, or has engaged in the following during the last five (5) years before the projected date of admission:
  - 1. Drug-related criminal activity;
  - 2. Violent criminal activity;
  - 3. Other criminal activity which may threaten the health, safety, or right to peaceful enjoyment of the premises by other tenants or persons residing in the immediate vicinity;

An arrest record, alone, will not serve as sufficient evidence of criminal activity that can support an adverse admission decision. Before the Greensboro Housing Authority denies admission to an individual or household on the basis of criminal activity by a household member or guest, it will determine that the relevant individual actually engaged in such activity.

An arrest record can trigger an inquiry into whether there is sufficient evidence to determine that a person engaged in disqualifying criminal activity but is not itself evidence on which to base a determination. The Greensboro Housing Authority can utilize other evidence, such as police reports detailing the circumstances of the arrest, witness statements, and other relevant documentation to assist them in making a determination that disqualifying conduct occurred. Reliable evidence of a conviction for criminal conduct that would disqualify an individual for tenancy may also be the basis for determining that the disqualifying conduct in fact occurred

- K. Have a family member who violated any family obligations, in the last five years, under previous participation in the program;
- L. Have a family member who has been evicted from federally assisted housing in the last five years;
- M. Have a family member who has committed fraud, bribery, or any other corrupt or criminal act in connection with any Federal housing program;
- N. Have breached an agreement with Greensboro Housing Authority to pay amounts owed to a Housing Authority or amounts paid to an owner by a Housing Authority;
- O. Have engaged in or threatened abusive or violent behavior towards any Greensboro Housing Authority staff member or tenant;
- P. If a welfare-to-work (WTW) family fails, willfully and persistently, to fulfill its obligations under the welfare-to-work voucher program.

#### **4.7 NOTIFICATION OF NEGATIVE ACTIONS**

Any applicant whose name is being removed from the waiting list will be notified by the Greensboro Housing Authority, in writing, that they have ten (10) calendar days, from the date of the written correspondence, to present mitigating circumstances or request an informal review in writing. The letter will also indicate that their name will be removed from the waiting list if they fail to respond within the timeframe specified. The Greensboro Housing Authority's system of removing applicants' names from the waiting list will not violate the rights of persons with disabilities. If an applicant's failure to respond to a request for information or updates was caused by the applicant's disability, the Greensboro Housing Authority will provide a reasonable accommodation. If the applicant indicates that they did not respond due to a disability, the Greensboro Housing Authority will verify that there is in fact a disability and that the accommodation they are requesting is necessary based on the disability. An example of a reasonable accommodation would be to reinstate the applicant on the waiting list based on the date and time of the original application.

#### **4.8 INFORMAL REVIEW**

##### **A. Informal Review for the Applicant**

The Greensboro Housing Authority will give an applicant for participation in the Housing Choice Voucher prompt notice of a decision denying assistance to the applicant. The notice will contain a brief statement of the reasons for the Greensboro Housing Authority decision. The notice will state that the applicant may request an informal review within 10 calendar days of the denial and will describe how to obtain the informal review. If denied because of a criminal record, GHA will provide such record to applicant upon request.

B. When an Informal Review is Not Required

The Greensboro Housing Authority will not provide the applicant an opportunity for an informal review for any of the following reasons:

1. A determination of the family unit size under the Greensboro Housing Authority subsidy standards.
2. A Greensboro Housing Authority determination not to approve an extension or suspension of a certificate or housing choice voucher term.
3. A Greensboro Housing Authority determination not to grant approval to lease a unit under the program or to approve a proposed lease.
4. A Greensboro Housing Authority determination that a unit selected by the applicant is not in compliance with HQS.
5. A Greensboro Housing Authority determination that the unit is not in accordance with HQS because of family size or composition.
6. General policy issues or class grievances.
7. Discretionary administrative determinations by the Greensboro Housing Authority.

C. Informal Review Process

The Greensboro Housing Authority will give an applicant an opportunity for an informal review of the Greensboro Housing Authority decision denying assistance to the applicant. The procedure is as follows:

1. The review will be conducted by any person or persons designated by the Greensboro Housing Authority other than the person who made or approved the decision under review or a subordinate of this person.
2. The applicant will be given an opportunity to present written or oral objections to the Greensboro Housing Authority decision.
3. The Greensboro Housing Authority will notify the applicant of the Greensboro Housing Authority decision after the informal review within 30 calendar days. The notification will include a brief statement of the reasons for the final decision.

D. Considering Circumstances

In deciding whether to deny assistance to an applicant because of action or inaction by members of the family, GHA may consider all of the circumstances in each case, including the seriousness of the case, the extent of participation or culpability of individual family members, and the effects of denial or termination of assistance on other family members who were not involved in the action or failure.

GHA may impose, as a condition of assistance for other family members, a requirement that family members who participated in or were culpable for the action or failure will not reside in the unit. The Greensboro Housing Authority may permit the other members of a tenant family to receive assistance.

In determining whether to deny assistance for drug and alcohol abuse the Greensboro Housing Authority will consider evidence of whether the household member:

1. Has successfully completed a supervised drug or alcohol rehabilitation program (as applicable) and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol;
2. Has otherwise been rehabilitated successfully and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol; or
3. Is participating in a supervised drug or alcohol rehabilitation program and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol.

E. Informal Review Procedures for Denial of Assistance on the Basis of Ineligible Immigration Status

The applicant family may request that the Greensboro Housing Authority provide for an informal review after the family has notification of the USCIS decision on appeal, or in lieu of request of appeal to the USCIS. The applicant family must make this request within 30 calendar days of receipt of the *Notice of Denial or Termination of Assistance*, or within 30 calendar days of receipt of the USCIS appeal decision.

For applicant families, the Informal Review Process above will be utilized with the exception that the applicant family will have up to 30 calendar days of receipt of the *Notice of Denial or Termination of Assistance*, or of the USCIS appeal decision to request the review.

## **5.0 SELECTING FAMILIES FROM THE WAITING LIST**



## 5.1 ***WAITING LIST ADMISSIONS AND SPECIAL ADMISSIONS***

The Housing Authority may admit an applicant for participation in the program either as a special admission or as a waiting list admission.

If HUD awards funding that is targeted for families with specific characteristics or families living in specific units, the Greensboro Housing Authority will use the assistance for those families.

## 5.2 ***PREFERENCES***

Admission preferences will be consistent with all applicable Federal nondiscrimination and civil rights statutes and requirements.

The Greensboro Housing Authority will select families based on the following preferences based on local housing needs and priorities.

Greensboro Housing Authority will give priority and maintain a separate waiting list for those families living in GHA-owned communities that will be displaced due to asset repositioning, redevelopment or relocation.

- A. Disaster Victims who are Public Housing Residents in another jurisdiction affected by a natural disaster mandated by the Department of Housing and Urban Development or victims by a natural disaster, as designated by local, state or federal government, within the Greensboro Housing Authority's jurisdiction.
- B. B. Families with an adult member currently and consecutively employed the for past 12 months. Those working in the GHA's jurisdiction can get a preference but not those attending school in Greensboro.
  - Or Head, spouse, or sole member is age 62 or older.
  - Or Head, spouse, or is a sole member is disabled based on HUD definition.
  - Or, enrolled full-time in an accredited non-profit institution of higher education (university, college, or community college); Full-time students must have completed at least the first year of their academic requirements and continuing. Graduates must be gainfully employed within a six-month time frame.
  - Or, enrolled in a job-training program, or a program that prepares someone for a job. Persons on job training or job readiness programs must complete at least 50% of their course work; and college graduates or graduates of job training or job readiness programs must be gainfully employed to receive this preference.
- C. Displaced person(s): Individuals or families displaced by public; or private action or natural disaster. This Preference includes individuals or families who have received a written condemnation notice from the City of Greensboro indicating condemnation of their rental unit is imminent. Renters who damage the rental home or are otherwise responsible for causing the condemnation are not eligible for this preference.

- D. All other applicants that reside in GHA jurisdiction.
- E. Applicants who satisfy preference criteria but who reside outside of GHA's jurisdiction.

Separate waiting lists are kept for families referred to GHA under special programs created by HUD, which includes but is not limited to, the Family Unification Program (FUP), Continuum of Care (CoC), Housing Opportunities for Persons with Aids (HOPWA), Targeting, Veterans Affairs Supportive Housing (VASH), choice mobility, or other asset Repositioning, redevelopment or relocation, Emergency Housing Vouchers (EHVs) and Fair Share Vouchers.

The Greensboro Housing Authority will not deny a local preference, nor otherwise exclude or penalize a family in admission to the program, solely because the family resides in public housing.

Applicants are responsible for notifying GHA in writing when the information they provided has changed. If a person who does not meet the residency preference at the time they apply subsequently moves to Greensboro, they must notify GHA of their change in address and provide proof of residency through such documents as rental lease or utility bills. If they meet the preference, they will be repositioned on the waiting list.

### **5.3 *SELECTION FROM THE WAITING LIST***

Based on the above preferences, all families in the Disaster preference will be offered housing before any families in the preference A, all families in preference A will be offered housing before any families in preference B, and preference B families will be offered housing before any families in preference C, and so forth.

The date and time of application will be utilized to determine the sequence within the above-prescribed preferences. Notwithstanding the above, if necessary to meet the statutory requirement that 75% of newly admitted families in any fiscal year be families who are extremely low-income (unless a different target is agreed to by HUD), the Greensboro Housing Authority retains the right to skip higher income families on the waiting list to reach extremely low-income families. This measure will only be taken if it appears the goal will not otherwise be met. To ensure this goal is met, the Housing Authority will monitor incomes of newly admitted families and the income of the families on the waiting list.

If there are not enough extremely low-income families on the waiting list, we will conduct outreach on a non-discriminatory basis to attract extremely low-income families to reach the statutory requirement.

**5.4 EMERGENCY HOUSING VOUCHERS (EHV)**

In order to be eligible for and EHV, an individual or family must meet one of four eligibility categories:

- Homeless
- As-risk of homelessness
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking and
- Recently homeless, as determined by the Secretary, and for whom providing rental assistance will prevent the family’s homelessness or having high risk of housing instability.

As of July 1,2021, GHA was selected to administer EHV’s. EHV’s are tenant-based vouchers under Section 8(o) of the United States Housing Act of 1937.

After September 30, 2023, a PHA may not reissue any previous leased EHV, regardless of when the assistance for the formerly assisted family ends or ended, subject to any guidance implemented by HUD.

**6.0 ASSIGNMENT OF UNIT SIZE (SUBSIDY STANDARDS)**

**6.1 UNIT SIZE MATCHING**

1. The Greensboro Housing Authority will issue a housing choice voucher for a particular bedroom size – the bedroom size is a factor in determining the family’s level of assistance.

The following guidelines will determine each family’s unit size without overcrowding or over-housing:

Number of Bedrooms	Number of Persons	
	Minimum	Maximum
0	1	1
1	1	2
2	2	4
3	3	6
4	5	8
5	7	10

2. The standards are based on the assumption that there will be 2 persons per bedroom of living/sleeping room.
3. In determining bedroom size, the Greensboro Housing Authority will provide a separate bedroom for the head-of-household, or head-of-household and spouse. GHA will provide a separate bedroom for:

- a. children to be born to single pregnant woman,
  - b. children who are in the process of being adopted,
  - c. children whose custody is being obtained,
  - d. children currently under a 50% or more joint custody decree,
  - e. children who are temporarily away at school or temporarily in foster care.
  - f. persons of different generations, and
  - g. children of opposite sex age nine and older.
4. The family of a live-in aide will not be considered in determining bedroom size.
- (i) As recorded in 24 CFR Section 5.403, a live-in aide is a person who resides with one or more elderly persons, near-elderly persons or persons with disabilities and who is: (1) determined to be essential to the care and well-being of the persons; (2) is not obligated for the support of the persons; and (3) would not be living in the unit except to provide the necessary supportive services. It should be noted that the definition applies to a specific person. In accordance with this definition, a live-in aide is not a member of the assisted family and is not entitled to the HCV as the remaining member of the tenant family.
  - (ii) Occasional, intermittent, multiple or rotating care givers do not meet the definition of a live-in aide since 24 CFR Section 982.402(7) implies live-in-aides must reside with a family permanently for the family unit size to be adjusted in accordance with the subsidy standards established by the PHA. Therefore, regardless of whether these caregivers spend the night; an additional bedroom should not be approved. (*See Section 10.8 on Verification of Live-in Aides*)
  - (iii) The PHA may disapprove such a person if s/he has: (1) committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program; (2) committed drug-related criminal activity or violent criminal activity; or (3) currently owes rent or other amounts to GHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act and all other screening criteria (see Section 4.6).
5. The following exceptions may apply:
- a. A validated request for the accommodation of a disability indicating the need for an additional bedroom occupancy (i.e., the individual needs space to store medical equipment and supplies). The family must provide documentation to substantiate the type of medical equipment and how long it is expected to be needed.

When a family has submitted documentation from a healthcare provider

and successfully been granted an additional bedroom, GHA will continue to verify every year during annual inspection that the extra bedroom is still being used to hold such medical equipment. If the extra bedroom is not being used for the intended purpose, GHA will reduce the subsidy standard and corresponding payment standard at the family's next annual recertification. GHA may take further action, if any family obligations under 24 CFR Section 982.551 were violated.

The Greensboro Housing Authority will grant exceptions to normal occupancy standards when a family requests a larger size than the guidelines allow and documents a disability or a medical reason why the larger size is necessary.

The family unit size will be determined by the Greensboro Housing Authority in accordance with the above guidelines and will determine the maximum rent subsidy for the family; however, the family may select a unit that may be larger or smaller than the family unit size. Once selected from the waiting list, GHA will allow applicants to add family members as a result of birth, adoption, legal custody, guardianship (as defined by Section 10.6) or marriage. Other family members may be added in limited circumstances, at the discretion of GHA on a case-by-case basis and determined by the Chief Operating Officer. Such circumstances include, but are not limited to, family members with disabilities, elderly parents, and adult children returning from military service.

GHA will not approve a unit in excess of one (1) bedroom above the family's established voucher size. If a family has already been provided an extra bedroom for a live-in aide or medical equipment, GHA will not approve a unit size larger than the family's voucher size.

## **6.2 BRIEFING**

When the Greensboro Housing Authority selects a family from the waiting list, the family will be invited to attend a virtual or in-person briefing explaining how the program works. In order to receive a housing choice, voucher the family is required to attend the briefing. If they cannot attend the originally scheduled briefing, they may attend a later session if approved in advance by the GHA. If the family fails to attend the briefing without good cause, they will be denied admission.

If an applicant with a disability requires auxiliary aids to gain full benefit from the briefing, the Housing Authority will furnish such aids where doing so would not result in a fundamental alteration of the nature of the program or in an undue financial or administrative burden. In determining the most suitable auxiliary aid, the Housing Authority will give primary consideration to the requests of the applicant. Families unable to attend a briefing due to a disability may request a reasonable accommodation such as having the briefing presented at an alternate location.

The briefing will cover at least the following subjects:

- A. A description of how the program works;
- B. Family and owner responsibilities;
- C. Where the family may rent a unit, including inside and outside the Housing Authority's jurisdiction;
- D. Types of eligible housing;
- E. An explanation of how portability works, including the family's assistance can be affected through re-screening by the Receiving Housing Authority, changes in the subsidy and payment standards, and other elements of the portability process that could affect the family's assistance. The Greensboro Housing Authority will not discourage the family from choosing to live anywhere in or outside its jurisdiction under portability procedures, unless otherwise expressly authorized by statute, regulation, PIH Notice, or court order;
- F. An explanation of the advantages of living in an area that does not have a high concentration of poor families; including maps that show locations of housing opportunities outside areas of poverty or minority concentration, both within and outside its jurisdiction and neighboring its jurisdiction; has assembled information about its jurisdiction; has assembled information about job opportunities, schools, transportation, and other services in these areas;
- G. An explanation that the family share of rent may not exceed 40% of the family's monthly adjusted income if the gross rent exceeds the applicable payment standard when the family initially rents a unit and the fact that the family may have to pay a security deposit from its own funds;
- H. A description of the homeownership program, if one exists; and
- I. An explanation of information contained in the Housing Choice Voucher packet.

### **6.3 PACKET**

During the briefing, the Housing Authority will give the family a packet covering at least the following subjects:

- A. The term of the housing choice voucher and the Housing Authority's policy on extensions and how suspensions of the term work under HUD's regulation. The packet will include information on how to request an extension and forms for requesting extensions;
- B. How the Housing Authority determines the housing assistance payment and total tenant payment for the family;

- C. Information on how the payment standard is determined, exception payment standard rent areas, and the utility allowance schedule;
- D. How the Housing Authority determines the maximum rent for an assisted unit and rent reasonableness;
- E. Where the family may lease a unit. For families qualified to lease outside the Housing Authority's jurisdiction, the packet includes an explanation of how portability works, including how the family's assistance can be affected through re-screening by the Receiving Housing Authority, changes in the subsidy and payment standards, other elements of the portability process that could affect the family's assistance, and a list of names, addresses and phone numbers of neighboring authorities;
- F. The HUD-required tenancy addendum that provides the language that must be included in any assisted lease, and a sample contract;
- G. The request for approval of the tenancy form and an explanation of how to request Housing Authority approval of a unit;
- H. A statement of the Housing Authority's policy on providing information to prospective owners. This policy requires applicants to sign disclosure statements allowing the Housing Authority to provide prospective owners with the family's current and prior addresses and the names and addresses of the landlords for those addresses. Upon request, the Housing Authority will also supply any factual information or third-party verification relating to the applicant's history as a tenant or their ability to comply with material standard lease terms or any history of drug trafficking, drug-related criminal activity or any violent criminal activity;
- I. Where the family may lease a unit. For families qualified to lease outside the Housing Authority's jurisdiction, the packet includes an explanation of how portability works, including how the family's assistance can be affected through re-screening by the Receiving Housing Authority, changes in the subsidy and payment standards, other elements of the portability process that could affect the family's assistance, and a list of names, addresses and phone numbers of neighboring authorities;
- J. Where the family may lease a unit. For families qualified to lease outside the Housing Authority's jurisdiction, the packet includes an explanation of how portability works, including how the family's assistance can be affected through re-screening by the Receiving Housing Authority, changes in the subsidy and payment standards, other elements of the portability process that could affect the family's assistance, and a list of names, addresses and phone numbers of neighboring authorities;

- K. The HUD-required tenancy addendum that provides the language that must be included in any assisted lease, and a sample contract;
- L. The request for approval of the tenancy form and an explanation of how to request Housing Authority approval of a unit;
- M. A statement of the Housing Authority's policy on providing information to prospective owners. This policy requires applicants to sign disclosure statements allowing the Housing Authority to provide prospective owners with the family's current and prior addresses and the names and addresses of the landlords for those addresses. Upon request, the Housing Authority will also supply any factual information or third-party verification relating to the applicant's history as a tenant or their ability to comply with material standard lease terms or any history of drug trafficking, drug-related criminal activity or any violent criminal activity;
- N. The Housing Authority's subsidy standards, including when the Housing Authority will consider granting exceptions to the standards;
- O. The HUD brochure on how to select a unit ("A Good Place to Live") and any other information HUD provides on the subject;
- P. The HUD-required lead-based paint brochure;
- Q. Information on Federal, State, and local equal opportunity laws; the brochure "Fair Housing: It's Your Right;" and a copy of the housing discrimination complaint form;
- R. A list of landlords or other resources (such as newspapers, organizations, and online search tools) known to the Greensboro Housing Authority who may be willing to lease a unit to the family or help the family find a unit, including owners with properties located outside areas of poverty or minority concentration;
- S. Notice that if the family includes a person with disabilities, the family may request a current list of accessible units known to the Greensboro Housing Authority that may be available;
- T. The family's obligations under the program;
- U. The grounds upon which the Housing Authority may terminate assistance because of the family's action or inaction;
- V. Greensboro Housing Authority informal hearing procedures, including when the Housing Authority is required to provide the opportunity for an informal hearing, and information on how to request a hearing;
- W. The Greensboro Housing Authority owner information brochure. This brochure can be given by the applicant to a prospective owner to help explain the program;



- X. An explanation of rights afforded to Housing Choice Voucher participants under the Violence Against Women Act;
- Y. A written explanation of the advantages of the living in an area that does not have a high concentration of poor families, including maps that show locations of housing opportunities outside its jurisdiction and neighboring its jurisdiction; has assembled information about job opportunities, school's transportation, and other services in these areas; and
- Z. A listing or map that delineates areas of poverty or minority concentration in the jurisdiction. Also, applicants shall be given information about job opportunities, schools, and other services in non-concentrated neighborhoods.

**6.4 *ISSUANCE OF HOUSING CHOICE VOUCHER; REQUEST FOR APPROVAL OF TENANCY***

Once all family information has been verified, their eligibility determined, their subsidy calculated, and they have attended the family briefing, the Greensboro Housing Authority will issue the housing choice voucher. At this point the family begins their search for a unit.

When the family finds a unit that the owner is willing to lease under the program, the family will submit the HUD-required tenancy addendum, the Request for Tenancy Approval form and an unsigned proposed lease. The terms of the HUD tenancy addendum shall prevail over any conflicting provisions of the lease. The family will submit the proposed lease and the request form to the Housing Authority during the term of the housing choice voucher.

Screening is the responsibility of the owner.

**6.5 *TERM OF THE HOUSING CHOICE VOUCHER***

The initial term of the housing choice voucher will be 60 calendar days and will be stated on the Housing Choice voucher.

The Housing Authority may grant one or more extensions of the term, but the initial term plus any extensions will not exceed 120 calendar days from the initial date of issuance without an extraordinary reason. To obtain an extension, the family must make a request prior to the expiration date. A statement of the efforts the family has made to find a unit must accompany the request. If the family documents their efforts and additional time can reasonably be expected to result in success, the Housing Authority will grant the length of request sought by the family or 60 calendar days, whichever is less.

If the family includes a person with disabilities and the family requires an extension due to the disability, the Housing Authority will grant an extension allowing the family the full 120 calendar days search time. If the Housing Authority determines that additional search time would be a reasonable accommodation, it will grant the additional search time.

Upon submittal of a completed Request for Tenancy Approval form, the Greensboro

Housing Authority will suspend the term of the housing choice voucher. The term will be in suspension until the date the Housing Authority provides notice that the request has been approved or denied. This policy allows families the full term (60 calendar days, or more with extensions) to find a unit, not penalizing them for the period during which the Housing Authority is acting on their request.

If a family's voucher expires, the family is no longer eligible for housing assistance. They are free to re-apply to the Housing Choice Voucher Program and start over again. If the waiting list is closed, they must wait until the Greensboro Housing Authority is once again accepting applicants for the program. They will be treated exactly like all other new applicants for the program.

## **6.6 APPROVAL TO LEASE A UNIT**

The Greensboro Housing Authority will approve a lease if all of the following conditions are met:

- A. The unit is eligible;
- B. The unit is inspected by the Housing Authority and passes HQS;
- C. The lease is approvable and includes the following;
  - 1. The names of the owner and the tenant;
  - 2. The address of the unit rented;
  - 3. The term of the lease (initial term and any provisions for renewal); The amount of the monthly rent to owner;
  - 4. A specification of what utilities and appliances are to be supplied by the owner, and what utilities and appliances are to be supplied by the family; and
  - 5. The required HUD tenancy addendum.
- D. The rent to owner is reasonable;
- E. The family's share of rent does not exceed 40% of their monthly-adjusted income if the gross rent exceeds the applicable payment standard;
- F. The owner certifies that he or she is not in a conflict of interest situation with the tenant.
- G. The owner has not been found to be debarred, suspended, or subject to a limited denial of participation by HUD or the Housing Authority; and

H. The family continues to meet all eligibility and screening criteria.

If tenancy approval is denied, the Housing Authority will advise the necessary party(ies) of any actions they could take that would enable the Housing Authority to approve the tenancy.

The lease term may begin only after all of the following conditions are met:

- A. The unit passes the Housing Authority HQS inspection;
- B. The family's share of rent does not exceed 40% of their monthly adjusted income if the gross rent exceeds the applicable payment standard;
- C. The landlord and tenant sign the lease to include the HUD required addendum;  
and
- D. The Housing Authority approves the leasing of the unit.

The Housing Authority will prepare the contract when the unit is approved for tenancy. Generally, the landlord, simultaneously with the signing of the lease and the HUD required tenancy addendum, will execute the contract.

Upon receipt of the executed lease and the signed contract by the landlord, the Housing Authority will execute the contract. The Housing Authority will not pay any housing assistance to the owner until the contract is executed.

Contracts will not be executed later than 60 calendar days after the beginning of the lease term barring unusual circumstances. In no event will a contract be consummated after 180 days has passed.

Any contract executed after the 60-day period will be void and the Housing Authority will not pay housing assistance to the owner.

#### **6.7 GREENSBORO HOUSING AUTHORITY DISAPPROVAL OF OWNER**

The Housing Authority will deny participation by an owner at the direction of HUD (one who has been debarred, suspended, or is subject to a limited denial of participation). The Housing Authority may also deny the owner's participation for any of the following reasons:

- A. The owner has violated any obligations under a HCVP Housing Assistance Payments Contract;
- B. The owner has committed fraud, bribery, or any other corrupt or criminal act in connection with any Federal Housing Choice Voucher Program;

- C. The owner has engaged in drug-related criminal activity or any violent criminal activity;
- D. The owner has a history or practice of non-compliance with HQS for units leased under HCVP or with applicable housing standards for units leased with project-based HCVP assistance or leased under any other Federal Housing Choice Voucher Program;
- E. The owner has a history or practice of renting units that fail to meet State or local codes;
- F. The owner has not paid State or local real estate taxes, fines, or assessments;
- G. The owner refuses (or has a history of refusing) to evict families for drug-related or violent criminal activity, or for activity that threatens the health, safety or right of peaceful enjoyment of the:
  - 1. premises by tenants, Greensboro Housing Authority employees or owner employees; or
  - 2. residences by neighbors;
- H. If the owner is the parent, child, grandparent, grandchild, sister, or brother or any member of the family of an applicant seeking the initial use of a housing choice voucher (currently shopping) unless the Greensboro Housing Authority determines that approving the unit would provide reasonable accommodation for a family member who is a person with disabilities;
- I. The Housing Authority has been informed by HUD that the federal government has instituted an administrative or judicial action against the owner for a violation of the Fair Housing Act or other federal equal opportunity requirements and such action is pending or a court or administrative agency has determined that the owner violated the Fair Housing Act or other federal equal opportunity requirements; or
- J. Other conflicts of interest under Federal, State, or local law.

## **6.8 INELIGIBLE/ELIGIBLE HOUSING**

The following types of housing cannot be assisted under the HCVP Tenant-Based Program:

- A. A public housing or Indian housing unit;
- B. A unit receiving project-based assistance under HCVP;
- C. Nursing homes board and care homes, or facilities providing continual

psychiatric, medical or nursing services;

- D. College or other school dormitories;
- E. Units on the grounds of penal, reformatory, medical, mental, and similar public or private institutions (except VASH voucher holders may lease units on the grounds of the Veteran Administration Medical Center);
- F. A unit occupied by its owner. This restriction does not apply to cooperatives or to assistance on behalf of a manufactured home owner leasing a manufactured home space; or units being purchased under a HCVP Homeownership Program; and
- G. A unit receiving any duplicative Federal, State, or local housing subsidy. This does not prohibit renting a unit that has a reduced rent because of a tax credit.
- H. The Greensboro Housing Authority will not approve a lease for any of the following special housing types, except as a reasonable accommodation for a family with disabilities:
  - Congregate Housing
  - Group Homes
  - Cooperative Housing
  - Single Room Occupancy Housing
- I. The Greensboro Housing Authority will approve leases for the following housing types:
  - Single family dwellings
  - Apartments
  - Manufactured housing
  - Manufactured home space rentals
  - House boats
  - Shared housing

## **6.9 SECURITY DEPOSIT**

The owner may collect a security deposit from the tenant in an amount not in excess of amounts charged in private market practice and not in excess of amounts charged by the owner to unassisted tenants.

When the tenant moves out of the dwelling unit, the owner, subject to State or local law,

may use the security deposit, including any interest on the deposit, in accordance with the lease, as reimbursement for any unpaid rent payable by the tenant, damages to the unit or for other amounts the tenant owes under the lease.

The owner must give the tenant a written list of all items charged against the security deposit and the amount of each item. After deducting the amount, if any, used to reimburse the owner, the owner must refund promptly the full amount of the unused balance to the tenant in compliance with State law.

If the security deposit is not sufficient to cover amounts the tenant owes under the lease, the owner may seek to collect the balance from the tenant.

## **7.0 MOVES WITH CONTINUED ASSISTANCE**

Participating families are allowed to move to another unit after the initial lease has expired, or if the landlord and the tenant have mutually agreed to terminate the lease, or if the Housing Authority has terminated the HAP contract. The Greensboro Housing Authority will issue the family a new housing choice voucher if the family does not owe the Greensboro Housing Authority or any other Housing Authority money, has not violated a Family Obligation, has not moved or been issued a housing choice voucher within the last 12 months, and if the Greensboro Housing Authority has projected sufficient funding for continued assistance. Funding is subject to HUD discretion. If the move is necessitated for a reason other than family choice, the 12-month requirement will be waived. This policy is consistent with all civil rights laws and regulations.

### **7.1 *WHEN A FAMILY MAY OR MAY NOT MOVE***

For families already participating in the Housing Choice Voucher Program, the Greensboro Housing Authority will allow the family to move to a new unit if:

- A. The assisted lease for the old unit has terminated;
- B. The owner has given the tenant a notice to vacate, has commenced an action to evict the tenant, or has obtained a court judgment or other process allowing the owner to evict the tenant; or
- C. The tenant has given notice of lease termination (if the tenant has a right to terminate the lease on notice to the owner); or
- D. The family or a member of the family is or has been the victim of domestic violence, sexual assault, dating violence, or stalking, as provided in 24 CFR part 5, subpart L, and the move is needed to protect the health or safety of the family or family member. The Greensboro Housing Authority will not terminate assistance if the family, with or without prior notification to the housing authority, already moved out of a unit in violation of the lease, if such move occurred to protect the health or safety of a family member who is or has been the victim of

domestic violence, dating violence, sexual assault, or stalking and who reasonably believed he or she was imminently threatened by harm from further violence if he or she remained in the dwelling unit.

For families already participating in the Housing Choice Voucher Program, the Greensboro Housing Authority will not allow the family to move to a new unit if:

- A. The family is not income eligible in the receiving agency's jurisdiction; or
- B. The family has moved out of their unit in violation of the lease unless the reason for the move is to protect a victim of VAWA who is otherwise in full compliance with all other program requirements and reasonable believed to be in imminent danger from the abuser.
- C. The family owes any monies to the Greensboro Housing Authority

For families already participating in the Housing Choice Voucher Program, the Greensboro Housing Authority may deny a family's request to move to a new unit:

- A. If the family violates any family obligations under the program;
- B. If any member of the family has been evicted from federally assisted housing in the last five years;
- C. If a PHA has ever terminated assistance under the program for any member of the family;
- D. If any member of the family has committed fraud, bribery, or any other corrupt or criminal act in connection with any Federal housing program;
- E. If the family currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act;
- F. If the family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease;
- G. If the family breaches an agreement with the PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA. (The PHA, at its discretion, may offer a family the opportunity to enter an agreement to pay amounts owed to a PHA or amounts paid to an owner by a PHA. The PHA may prescribe the terms of the agreement.);
- H. If a family participating in the FSS program fails to comply, without good cause, with the family's FSS contract of participation;

- I. If the family has engaged in or threatened abusive or violent behavior toward PHA personnel;
- J. If a welfare-to-work (WTW) family fails, willfully and persistently, to fulfill its obligations under the welfare-to-work voucher program;
- K. If the family has been engaged in criminal activity or alcohol abuse
- L. If the family does not comply with our policy on the timing and frequency of moves.
- M. If the family is not eligible to portability due to being a nonresident when admitted to the program; or
- N. If the Greensboro Housing Authority has insufficient funding for continued assistance to the family.
  - 1. A voucher cannot be rescinded if the Greensboro Housing Authority has approved a move, subsequently finds out a funding shortfall will occur and the family cannot remain in its old unit (e.g. the unit has already been leased to another family).
  - 2. Under portability, an initial housing authority cannot terminate a portability unit because it is not a party to the HAP contract.

## **7.2 PROCEDURES REGARDING FAMILY MOVES**

GHA will not enter into a new HAP contract with families considering transferring to a new unit until the concerned family attends a move briefing. The briefing is intended to provide the following information:

- A. A refresher on program requirements and the family's responsibilities. Emphasis will be on giving proper notice and meeting all lease requirements such as leaving the unit in good condition;
- B. Information about finding suitable housing and the advantages of moving to an area that does not have a high concentration of poor families;
- C. Payment standards, exception payment standard rent areas, and the utility allowance schedule;
- D. An explanation that the family share of rent may not exceed 40% of the family's monthly adjusted income if the gross rent exceeds the applicable payment standard when initially renting a unit;
- E. Portability requirements and opportunities;
- F. The need to have a reexamination conducted within 120 calendar days prior to the



move;

- G. An explanation and copies of the forms required to initiate and complete the move;
- H. All forms and brochures provided to applicants at the initial briefing.

Families are required to give proper written notice of their intent to terminate the lease. In accordance with HUD regulations, no notice requirement may exceed 60 calendar days. During the initial term, families may not end the lease unless they and the owner mutually agree to end the lease. If the family moves from the unit before the initial term of the lease ends without the owner's and the Greensboro Housing Authority's approval, it will be considered a serious lease violation and subject the family to termination from the program.

The family is required to give the Greensboro Housing Authority a copy of the notice to terminate the lease at the same time as it gives the notice to the landlord. A family's failure to provide a copy of the lease termination notice to the Greensboro Housing Authority will be considered a violation of Family Obligations and may cause the family to be terminated from the program.

A family who gives notice to terminate the lease must have the landlord or his agent sign a statement and return a copy to GHA staff. Failure to follow the above procedures may subject the family to termination from the program.

When a request to move is due to a disability of a family member, even if a family might otherwise be restricted from moving (e.g., under a "one move per year" policy or because of insufficient funding), GHA will consider the request under reasonable accommodations in accordance with HUD's regulations, including reasonable accommodations relating to moves that are necessary for a qualified individual with a disability to benefit from the program.

## **8.0 PORTABILITY**

### **8.1 GENERAL POLICIES OF THE GREENSBORO HOUSING AUTHORITY**

A family whose head or spouse has a domicile (legal residence) in the jurisdiction of the Greensboro Housing Authority at the time the family first submits its application for participation in the program to the Greensboro Housing Authority may lease a unit anywhere in the jurisdiction of the Greensboro Housing Authority or outside the Greensboro Housing Authority jurisdiction as long as there is another entity operating a tenant-based Housing Choice Voucher covering the location of the proposed unit. This does not apply when the family or an affiliated individual is or has been the victim of domestic violence, dating violence, sexual assault, or stalking and the move is needed to protect the health or safety of the family or an affiliated individual. To the degree possible, portability moves will be utilized to affirmatively further fair housing.

If the head or spouse of the assisted family did not have a legal residence in the jurisdiction

of the Greensboro Housing Authority at the time of its application, the family will not have any right to lease a unit outside of the Greensboro Housing Authority jurisdiction for a 12-month period beginning when the family is first admitted to the program.

During this period, the family may only lease a unit located in the jurisdiction of the Greensboro Housing Authority. This does not apply when the family or an affiliated individual is or has been the victim of domestic violence, dating violence, sexual assault, or stalking and the move is needed to protect the health or safety of the family or an affiliated individual. To the degree possible, portability moves will be utilized to affirmatively further fair housing.

A family's eligibility to exercise the portability option is to be determined by the Initial Housing Authority.

If a family chooses to port to another housing authority's jurisdiction, the Initial Housing Authority shall inform the family that it may be re-screened by the Receiving Housing Authority and may lose its assistance if the family fails to meet the Receiving Housing Authority's screening criteria.

Families participating in the Housing Choice Voucher Program will not be allowed to move more than once in any 12-month period and under no circumstances will the Greensboro Housing Authority allow a tenant to improperly break a lease. Under extraordinary circumstances the Greensboro Housing Authority may consider allowing more than one move in a 12-month period, or as a reasonable accommodation for a family with disabilities.

Families may only move to a jurisdiction where a Housing Choice Voucher Program is being administered. If more than one housing authority operates a Housing Choice Voucher in the jurisdiction where the participant is moving, the participant may choose which housing authority the participant wants to administer the voucher. This does not apply when the family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, or stalking and the move is needed to protect the health or safety of the family or an affiliated individual. To the degree possible, portability moves will be utilized to affirmatively further fair housing.

For income targeting purposes, the family will count towards the initial housing authority's goals unless the receiving housing authority absorbs the family. If absorbed, the admission will count towards the receiving housing authority's goals. This does not apply when the family or a member of the family is or has been the victim of domestic violence, dating violence, or stalking and the move is needed to protect the health or safety of the family or family member. To the degree possible, portability moves will be utilized to affirmatively further fair housing.

If a family has moved out of their assisted unit in violation of the lease, the Greensboro Housing Authority will not issue a housing choice voucher, and will terminate assistance in compliance with Section 16.0, Termination of the Lease and Contract.

This will not apply if the family has complied with all program requirements and the family

has moved out of the assisted dwelling unit in order to protect the health or safety of an individual who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking and who reasonably believed he or she was imminently threatened by harm from further violence if he or she remained in the assisted dwelling unit. This does not apply when the family or an affiliated individual is or has been the victim of domestic violence, dating violence, sexual assault, or stalking and the move is needed to protect the health or safety of the family or an affiliated individual. To the degree possible, portability moves will be utilized to affirmatively further fair housing.

To the degree possible, portability moves will be utilized to affirmatively further fair housing

## **8.2 INCOME ELIGIBILITY**

- A. A family must be income-eligible in the area where the family first leases a unit with assistance in the HCVP.
- B. If a portable family is already a tenant in the Initial Housing Authority's HCVP, income eligibility is not re-determined.

## **8.3 PORTABILITY: ADMINISTRATION BY RECEIVING HOUSING AUTHORITY**

- A. When a family utilizes portability to move to an area outside the Initial Housing Authority jurisdiction, another Housing Authority (the Receiving Housing Authority) must administer assistance for the family if that Housing Authority has a tenant-based program covering the area where the unit is located.
- B. A Housing Authority with jurisdiction in the area where the family wants to lease a unit must issue the family a housing choice voucher. If there is more than one such housing authority, the family may choose which housing authority shall become the Receiving Housing Authority. The Initial Housing Authority shall provide the family with the appropriate contact information for the Receiving Housing Authority.

## **8.4 PORTABILITY PROCEDURES**

- A. When the Greensboro Housing Authority is the Initial Housing Authority:
  - 1. The Greensboro Housing Authority will brief the family on the process that must take place to exercise portability. The family will be required to attend an applicant or mover's briefing.
  - 2. The Greensboro Housing Authority will determine whether the family is income-eligible in the area where the family wants to lease a unit if the family is not already a program participant and otherwise eligible to move.
  - 3. The Greensboro Housing Authority will advise the family how to contact and request assistance from the Receiving Housing Authority by giving them the name and telephone number of the person responsible for working with incoming portability families and any procedures related to getting an appointment for the

issuance of a voucher. If there are more than one agency administering vouchers in the area the family wants to move to, the family shall choose which one to use.

4. The Greensboro Housing Authority will, within ten (10) calendar days, notify the Receiving Housing Authority to expect the family via email or other delivery confirmation.
5. The Greensboro Housing Authority will immediately mail, email or fax the Receiving Housing Authority a completed Part I of HUD Form 52665, the most recent HUD Form 50058 (Family Report) for the family, and a copy of the family's voucher. If the family is an applicant and not a participant, the Greensboro Housing Authority will provide the Receiving Housing Authority with the family information and income information in a format similar to that utilized by the 50058. It shall also provide any verification information and a copy of the voucher signed by the participant and the Greensboro Housing Authority.
6. If financial circumstances dictate, the Greensboro Housing Authority may deny portability moves to a higher cost area for its Housing Choice Voucher participants and/or shoppers if GHA has insufficient funds to pay the higher subsidy amounts and the receiving housing authority declines to absorb the family. While the Board of Commissioners must establish this policy after an examination of the fiscal affairs of the organization, individual denials of portability shall only occur after the GHA has determined that the receiving housing authority will not absorb the family. The denial of absorption shall be documented in that person's file.

This can only occur if the portability action would cause the Greensboro Housing Authority to be unable to avoid terminating the vouchers of current voucher participants during the affected calendar year. If a family is denied its portability request, no subsequent families will be admitted to the program until GHA has determined that sufficient funding exists to approve the move and has notified the family that the family may now exercise its move to the higher cost area.

GHA will notify the HUD Field Office in writing that it is denying a portability move. The notification will include:

1. A financial analysis that demonstrates insufficient funds are projected to meet the current calendar year projection of expenses. The projection must not include vouchers that have been issued but are not yet under contract.
2. A statement certifying the Greensboro Housing Authority has ceased issuing vouchers and will not admit families from their waiting list while the limitation on moves to a higher cost unit is in place.
3. A copy of this Section 8 Administrative Plan stating how the GHA will address families who have been denied moves.

If a family is denied a portability request due to lack of funding, it shall be so notified in writing when the denial is made. The letter shall include the period the

family's request to move will remain active six months and how they will be notified when funds become available.

B. When the Greensboro Housing Authority is the Receiving Housing Authority:

1. When the portable family requests assistance from the Greensboro Housing Authority, the Greensboro Housing Authority will within ten (10) calendar days of HAP contract execution (not its effective date) inform the Initial Housing Authority via email or other delivery confirmation that it will absorb the family into its program or notify the Initial Housing Authority within the time limit set forth in Part I of the 52665 that it will bill the Initial Housing Authority for assistance on behalf of the portable family.

Completing Part II of HUD Form 52665 in a timely manner (10 business days or less of the date the HAP contract is executed) will accomplish this. If the family is absorbed, the Greensboro Housing Authority will also send the Initial Housing Authority a new HUD Form 50058.

The family will attend the briefing and the Greensboro Housing Authority will issue a housing choice voucher to the family as long as the initial voucher has not expired (if it has expired, the Greensboro Housing Authority will contact the Initial Housing Authority to determine whether it will extend the voucher or if the family shall be referred back to the Initial Housing Authority). The term of the Greensboro Housing Authority's housing choice voucher will not expire before 30 calendar days after the expiration date of any Initial Housing Authority's housing choice voucher. The Greensboro Housing Authority will determine whether to extend the housing choice voucher term. The decision to extend will take into account the Greensboro Housing Authority's existing absorption policy and the billing deadline date provided by the Initial Housing Authority in the 52665.

If an extension is granted, the Initial Housing Authority will be informed of this decision. The family must submit a request for tenancy approval to the Greensboro Housing Authority during the term of the Greensboro Housing Authority's housing choice voucher. If the Greensboro Housing Authority has decided to bill the Initial Housing Authority, the request for tenancy approval must be received in enough time for GHA to process a Request for Tenancy Approval and execute a HAP contract before the billing deadline date.

2. The Greensboro Housing Authority will determine the family unit size for the portable family. The family unit size is determined in accordance with the Greensboro Housing Authority's subsidy standards. If we want to do so, the Greensboro Housing Authority reserves the right to conduct an income reexamination for a participant family. Also, when a receiving housing authority, the Greensboro Housing Authority's policies will govern the ported voucher.

3. The Greensboro Housing Authority will notify the Initial Housing Authority if the family has leased an eligible unit under the program, or if the family fails to submit a request for tenancy approval for an eligible unit within the term of the housing choice voucher. In any event the Greensboro Housing Authority will notify the Initial Housing Authority of what is occurring before the expiration deadline established in the HUD Form 52665. If the family has leased a unit, the Greensboro Housing Authority will notify the Initial Housing Authority of this fact within ten (10) working days following the date the HAP contract was executed and in time that it will be received no later than sixty (60) days following the expiration date of the family's voucher issued by the Initial PHA.
4. In order to provide tenant-based assistance for portable families, the Greensboro Housing Authority will perform all Housing Authority program functions, such as reexaminations of family income and composition. At any time, either the Initial Housing Authority or the Greensboro Housing Authority may make a determination to deny or terminate assistance to the family. If assistance is denied or terminated, the family shall have a right to an informal hearing.
5. The Greensboro Housing Authority may deny or terminate assistance for family action or inaction in accordance with 24 CFR 982.552 and 24 CFR 982.553.
6. As the receiving housing authority, the Greensboro Housing Authority will accept all eligible portability families, with limited exceptions. If an exception is utilized, the Greensboro Housing Authority will seek prior approval from HUD.
7. If a family is denied admission to the program, the participant is entitled to request an informal hearing.
8. If the family decides not to lease in our jurisdiction, it shall be referred back to the Initial Housing Authority.
9. Although the Greensboro Housing Authority will promptly issue a voucher to an incoming portability family, it will still subject the families to its normal screening procedures. If the family fails to pass the screening thresholds either the voucher will be revoked or the family will be terminated from the program if a unit has already been leased.

#### C. Absorption by the Greensboro Housing Authority

If funding is available under the consolidated ACC for the Greensboro Housing Authority's Housing Choice Voucher Program when the portable family is received, the Greensboro Housing Authority may absorb the family into its HCVP.

The decision to absorb or not will be made on a case-by-case basis and will solely be the decision of the Greensboro Housing Authority. If absorbed, the family is assisted with

funds available under the consolidated ACC for the Greensboro Housing Authority's Tenant-Based Program. The decision to absorb, or not, will be communicated in writing to the initial housing authority as soon as possible. A decision to absorb is irreversible without the permission of the initial housing authority.

#### D. Portability Billing

To cover assistance for a portable family, the Receiving Housing Authority may bill the Initial Housing Authority for housing assistance payments and administrative fees as long as all HUD required deadlines have been complied with. The billing procedure will be as follows:

1. As the Initial Housing Authority, the Greensboro Housing Authority will within thirty (30) calendar days of receipt of the completed Part II of the HUD Form 52665 reimburse the Receiving Housing Authority for the full amount of the housing assistance payments made by the Receiving Housing Authority for the portable family in a form and manner the Receiving Housing Authority is able and willing to accept. Payments made after the first payment shall be sent in time for the Receiving Housing Authority to receive the payment no later than the fifth working day of the month. The amount of the housing assistance payment for a portable family in the Receiving Housing Authority's program is determined in the same manner as for other families in the Receiving Housing Authority's program.

The Initial Housing Authority will promptly reimburse the Receiving Housing Authority for the lesser of 80% of its prorated column B administrative fee, 100% of the Receiving Housing Authority's normal column B administrative fee, or a negotiated amount that both housing authorities agree to of the Initial Housing Authority's ongoing administrative fee for each unit month that the family receives assistance under the tenant-based programs and is assisted by the Receiving Housing Authority. If HUD is prorating the administrative fee, the prorated amount will be used.

#### E. When a Portable Family Moves

When a portable family moves out of the tenant-based program of a Receiving Housing Authority that has not absorbed the family, the Housing Authority in the new jurisdiction to which the family moves become the Receiving Housing Authority, and the first Receiving Housing Authority is no longer required to provide assistance for the family.

#### F. On-going Responsibilities as a Receiving Housing Authority

When the Greensboro Housing Authority is a receiving agency, it will:

1. Send the Initial Housing Authority an updated HUD Form 50058 at each annual recertification or Interim reexamination so the Initial Housing Authority can reconcile it with its records.

2. Send the Initial Housing Authority a copy of any new HUD Forms 52665s and 50058s to report any change in the billing amount within ten (10) working days of the effective date of any change in the billing amount. If the Receiving Housing Authority fails to update the 50058 on time, the Initial Housing Authority will continue payments based on the last 50058 received.
3. Notify the Initial Housing Authority within ten (10) working days following the effective date of the termination of the billing arrangement if the Greensboro Housing Authority decides to absorb a family whose voucher it had previously been administering.
4. Promptly notify the Initial Housing Authority if the family decides it wants to move to yet another jurisdiction and request that the Initial Housing Authority send a new HUD Form 52665 and supporting documentation to the new Receiving Housing Authority.
5. Any special purpose vouchers shall retain their original character and rules.
6. Retain copies of all communication between Initial and Receiving Housing Authorities.

#### G. FSS Portability

A family participating in the FSS program is generally required to lease a unit in the initial PHA's jurisdiction for a minimum of 12 months after the effective date of the contract of participation. Initial PHAs may allow a move during this 12-month period. After this 12-month period, FSS families may move under portability as long as they are eligible to move under regular HCV program regulations and requirements.

FSS regulations allow an FSS family that ports to continue participation in the initial PHA's FSS program, if the FSS family demonstrates to the satisfaction of the initial PHA that the family will be able to fulfill its responsibilities under the initial or a modified contract of participation. At the receiving PHA's discretion, FSS families that port may be admitted into the FSS program of the receiving PHA. In certain cases, participation in FSS for a family that moves under portability will not be possible.

## **9.0 DETERMINATION OF FAMILY INCOME**

### ***9.1 INCOME, EXCLUSIONS, AND DEDUCTIONS FROM INCOME***

To determine annual income, the Greensboro Housing Authority counts the most recent annual income, as available in HUD's Enterprise Income Verification (EIV) report, as per PIH Notice 2013-3, of all family members, excluding the types and sources of income that are specifically excluded. Once the annual income is determined, the Greensboro Housing Authority subtracts all allowable deductions (allowances) as the next step in determining the Total Tenant Payment. If a tenant disputes the EIV-reported income information and is unable to provide acceptable documentation to resolve the dispute, GHA will request written third-party verification. GHA will



continue to verify income from sources not available in EIV.

## **9.2 INCOME**

- A. Annual income means all amounts, monetary or not, that:
1. Go to (or on behalf of) the family head or spouse (even if temporarily absent) or to any other family member, or
  2. Are not specifically excluded from annual income.
  3. Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date;
  4. Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

GHA will annualize anticipated cyclical or seasonal income (i.e., \$2,000 per month x 8 months, \$400 per month x 4 months) from all known sources for families with seasonal or cyclical employment up and until the next annual recertification is due. Families with cyclical or season income will be advised that interim recertifications will not be conducted unless there has been an unexpected change in income during that period. The policy does not exempt participants from reporting income in excess of the cyclical income.

- B. Annual income includes, but is not limited to:
1. The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services.
  2. The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness are not used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession is included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family.
  3. Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness are not used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from an investment is included in income, except to the extent the withdrawal is reimbursement of cash or assets

invested by the family. Where the family has net family assets in excess of \$5,000, annual income includes the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD. As permitted by PIH Notice 2013-3, GHA will accept a family's self-declaration of the amount of assets of less than \$5,000, and the amount of income expected to be received from those assets. Income that could have been derived from assets worth more than \$1000 that were disposed of for less than fair market value within the past two years will be counted as income. Where the family net assets exceed 5000, GHA will require supporting documentation (e.g. bank statements) to confirm the authenticity of those assets. Retirement accounts and educational savings accounts will not be considered a net family asset. The threshold for imputing income from assets increases from \$5,000 to \$50,000, (any actual income from assets under \$50,000 is still included).

4. The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount. (However, deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts are excluded.)
5. Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay. (However, lump sum additions such as insurance payments from worker's compensation are excluded.)
6. Welfare assistance.
  - a. Welfare assistance payments
    - i. Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) program are included in annual income only to the extent such payments:
      - (a) Qualify as assistance under the TANF program definition at 45 CFR 260.31; and
      - (b) Are not otherwise excluded under paragraph Section 9.3 of this policy.
  - b. If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be

included as income consists of:

- i. The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus
  - ii. The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this requirement is the amount resulting from one application of the percentage.
- c. Imputed welfare income.
- i. A family's annual income includes the amount of imputed welfare income (because of a specified welfare benefits reduction, resulting from either welfare fraud or the failure to comply with economic self-sufficiency requirements, as specified in notice to the Greensboro Housing Authority by the welfare agency), plus the total amount of other annual income.
  - ii. At the request of the Greensboro Housing Authority, the welfare agency will inform the Greensboro Housing Authority in writing of the amount and term of any specified welfare benefit reduction for a family member, and the reason for such reduction, and will also inform the Greensboro Housing Authority of any subsequent changes in the term or amount of such specified welfare benefit reduction. The Greensboro Housing Authority will use this information to determine the amount of imputed welfare income for a family.
  - iii. A family's annual income includes imputed welfare income in family annual income, as determined at an interim or regular reexamination of family income and composition, during the term of the welfare benefits reduction (as specified in information provided to the Greensboro Housing Authority by the welfare agency).
  - iv. The amount of the imputed welfare income is offset by the amount of additional income a family receives that commences after the time the sanction was imposed. When such additional income from other sources is at least equal to the imputed welfare income, the imputed welfare income is reduced to zero.
  - v. The Greensboro Housing Authority will not include imputed

welfare income in annual income if the family was not an assisted tenant at the time of the sanction.

- vi. If a tenant is not satisfied that the Greensboro Housing Authority has calculated the amount of imputed welfare income in accordance with HUD requirements, and if the Greensboro Housing Authority denies the family's request to modify such amount, then the Greensboro Housing Authority shall give the tenant written notice of such denial, with a brief explanation of the basis for the Greensboro Housing Authority's determination of the amount of imputed welfare income. The Greensboro Housing Authority's notice shall also state that if the tenant does not agree with the determination, the tenant may contest the decision in accordance with our informal review policy.

d. Relations with welfare agencies

- i. The Greensboro Housing Authority will ask welfare agencies to inform of any specified welfare benefits reduction for a family member, the reason for such reduction, the term of any such reduction, and any subsequent welfare agency determination affecting the amount or term of a specified welfare benefits reduction. If the welfare agency determines a specified welfare benefits reduction for a family member, and gives the Greensboro Housing Authority written notice of such reduction, the family's annual incomes shall include the imputed welfare income because of the specified welfare benefits reduction.
- ii. The Greensboro Housing Authority is responsible for determining the amount of imputed welfare income that is included in the family's annual income as a result of a specified welfare benefits reduction as determined by the welfare agency, and specified in the notice by the welfare agency to the agency. However, the Greensboro Housing Authority is not responsible for determining whether a reduction of welfare benefits by the welfare agency was correctly determined by the welfare agency in accordance with welfare program requirements and procedures, nor for providing the opportunity for review or hearing on such welfare agency determinations.
- iii. Such welfare agency determinations are the responsibility of the welfare agency, and the family may seek appeal of such determinations through the welfare agency's normal due process procedures. The Greensboro Housing Authority shall rely on the welfare agency notice to

Greensboro Housing Authority of the welfare agency's determination of a specified welfare benefits reduction.

7. Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling. Expenses related to attending an institution of higher education must not be included as tuition. Examples of these expenses include, but are not limited to, room and board, books, supplies, meal plans, transportation and parking, student health insurance plans, and other non-fixed sum charges. GHA must verify the amounts of tuition and required fees charged by the school when determining annual income. GHA may wish to verify those amounts using the student's bill or account statement (including an online account statement) as provided by the school's registrar's office, or by contacting the registrar's office directly. Many institutions of higher education provide an itemized list covering tuition and fees that are charged to a majority of their students on their websites.
8. All regular pay, special pay, and allowances of a member of the Armed Forces. (Special pay to a member exposed to hostile fire is excluded.)
9. If a participant purchases a home using the Section 8 Homeownership option, the value of this asset shall be excluded from the income calculation for the first ten years of ownership from the closing date. For all recertifications occurring after ten years of ownership, the value of the asset shall equal the fair market value of the property minus any loans on the property and minus 10% of the fair market value of the property.

The fair market value of the property will be determined by the assessed value as determined by the County Assessor if the assessed value is made at market value. This market value will be obtained by reviewing and documenting the local assessment roll or the owner's most recent property tax bill. If a market value tax assessment is not available, then the Greensboro Housing Authority will use the sales comparison method examining at least three comparable properties in the surrounding (or similar) neighborhood that possess comparable factors that affect market value.

For determining the loans on the property, GHA will first try to verify the current payoff amount of the loan(s) included on the participant's monthly mortgage statement. If the payoff amount is not available, GHA may deduct the loan balance from the market value and document the file as to the method used.

For section 8 programs only and as provided in 24 CFR 5.612, any financial assistance, in excess of amounts received for tuition plus any other required fees and charges, that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or from an institution

of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except that financial assistance described in this paragraph is not considered annual income for persons over the age of 23 with dependent children. For purposes of this paragraph, “financial assistance” does not include loan proceeds for the purpose of determining income.

- C. The Greensboro Housing Authority will determine seasonally employed residents’ and applicants’ rent using one of two HUD-approved rent calculation methods. Residents will be informed of both methods and will be given the opportunity to select which method they want used when their rent is calculated. The applicant or resident will be required to select one of the two calculations methods: Method 1 and Method 2. For Method 1 a residents’ actual income is annualized and an interim reexamination is conducted. For Method 2 a resident’s anticipated income from all known sources is used with the support from a history of previous years income –no interim reexamination is conducted.

### **9.3 EXCLUSIONS FROM INCOME**

Annual income does not include the following:

- A. Income from employment of children (including foster children) under the age of 18 years;
- B. Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone);
- C. Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker’s compensation), capital gains and settlement for personal or property losses;
- D. Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
- E. Income of a live-in aide;
- F. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
- G. The amounts received from the following programs:
  - 1. Amounts received under training programs funded by HUD;  
  
Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
  - 2. Amounts received by a tenant in other publicly assisted programs that are

specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and that are made solely to allow participation in a specific program;

3. Amounts received under a tenant service stipend. A tenant service stipend is a modest amount (not to exceed \$200 per month) received by a tenant for performing a service for the Housing Authority or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, tenant initiative coordination, and serving as a member of the Greensboro Housing Authority Board of Commissioners. No tenant may receive more than one such stipend during the same period of time;
4. Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as tenant management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program; payments from training programs funded by HUD or qualifying Federal, State, Tribal or local employment training programs (including training programs not affiliated with a local government) and payments from training of a family member as resident management staff from the family's income.
5. Temporary, nonrecurring, or sporadic income (including gifts and Replacement Housing "gap" payments). This specifically includes temporary income payments from the U. S. Census Bureau, defined as employment lasting no longer than 180 days per year and not culminating in permanent employment. Non-recurring income that will not be repeated in the coming year, including lump-sum payments from lottery or other contest winnings, or amounts received from civil rights settlements or judgments (regardless of how the payment is structured), or State refundable tax credits or State tax refunds, or funds received from Medicaid or other state/local programs meant to keep a family member with a disability living at home, or Veterans' aide and attendant care, or distributions of principal from non-revocable trusts, including Special Needs Trusts, State and/or Tribal kinship or guardianship care payments, or value of "baby bond" account, or loan proceeds disbursed to or on behalf of a borrower, or loan proceeds received by a third party instead of the family, such as student loans or car loans, or payments received by Tribal members resulting from mismanagement of assets held in trust by the United States, or funds received from any account under a retirement plan recognized by the IRS, including individual retirement arrangements (IRAs), employer retirement plans, and retirement plans for self-employed individuals; however, any distribution of periodic payments from these retirement accounts are included as income at the time they are

received by the family; including lump-sum payments from lottery or other contest winnings. However, PHAs and owners would consider any actual or imputed returns from assets as income at the next applicable income examination.

In the case where the lump sum addition to assets would lead to imputed income, which is unearned income, which increases the family's annual adjusted income by ten percent or more, then the addition of the lump sum to the family's assets will trigger an immediate interim reexamination of income, based on information that the family provides. This will allow GHA flexibility regarding reexamination of income as soon as the lump sum is added to the family's net family assets, unless the addition takes place in the last 3 months of family's income certification period and GHA or the owner chooses not to conduct the examination.

6. Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
7. Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household and spouse);
8. Adoption assistance payments in excess of \$480 per adopted child;
9. Deferred periodic amounts from Supplemental Security Income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts;
10. Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit; Amounts paid by a State agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or
11. Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits. These exclusions include:
  - a. The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 5044(g), 5058);
  - b. Payments to Volunteers under the Domestic Volunteer Services Act of 1973;
  - c. Payments received under the Alaska Native Claims Settlement Act
  - d. Income from sub marginal land of the U.S. that is held in trust for



- certain Indian tribes;
- e. Payments made under HHS's Low-Income Energy Assistance Program
  - f. Income from the disposition of funds of the Grand River Band of Ottawa Indians;
  - g. The first \$2000 per capita shares received from judgment funds awarded by the Indian National Gaming Commission or the U.S. Claims Court, the interests of individual Indians in trust or restricted lands, and the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trusts or restricted lands. This exclusion does not include proceeds of gaming operations regulated by the Commission;
  - h. Amounts of scholarships funded under title IV of the Higher Education Act of 1965 (20 U.S.C. 1070), including awards under federal work-study programs or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu). For section 8 programs only (42 U.S.C. 1437f), any financial assistance in excess of amounts received by an individual for tuition (See definition of Tuition in Glossary) and any other required fees and charges under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall not be considered income to that individual if the individual is over the age of 23 with dependent children (Pub. L. 109-115, section 327) (as amended); Income and distributions from any Coverdell education savings account or any qualified tuition program.
  - i. Payments received under the Older Americans Act of 1965;
  - j. Payments from Agent Orange Settlement;
  - k. Payments received under the Maine Indian Claims Act;
  - l. The value of childcare under the Child Care and Development Block Grant Act of 1990;
  - m. Earned income tax credit refund payments;
  - n. Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation;
  - o. Payments for living expenses under the AmeriCorps Program;
  - p. Any allowance paid under the provisions of 38 U.S.C. 1883(c) to children of Vietnam veterans born with spina bifida, children of

- women Vietnam veterans born with certain birth defects, and children of certain Korean service veterans born with spina bifida;
- q. Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance;
  - r. Allowances, earnings and payments to individuals participating in programs under the Workforce Investment Act of 1998;
  - s. Any amount received under the School Lunch Act and the Child Nutrition Act of 1966 (42 U.S.C. 1780(b)), including reduced-price lunches and food under the Special Supplemental Food Program for Women, Infants, and Children (WIC);
  - t. Payments, funds or distributions authorized, established, or directed by the Seneca Nation Settlement Act of 1990 (25 U.S.C. 1774f(b));
  - u. Payments from any deferred U.S. Department of Veterans Affairs disability benefits that are received in a lump sum amount or in prospective monthly amounts (42 U.S.C. 1437a(b)(4));
  - v. Compensation received by or on behalf of a veteran for service-connected disability, death, dependency, or indemnity compensation as provided by an amendment by the Indian Veterans Housing Opportunity Act of 2010 (Pub. L. 111–269) to the definition of income applicable to programs authorized under the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4101) and administered by the Office of Native American Programs;
  - w. A lump sum or a periodic payment received by an individual Indian pursuant to the Class Action Settlement Agreement in the case entitled *Elouise Cobell et al. v. Ken Salazar et al.*, United States District Court, District of Columbia, for a period of one year from the time of receipt of that payment as provided in the Claims Resolution Act of 2010 (Pub. L. 111–291);
  - x. Any amounts in an “individual development account” as provided by the Assets for Independence Act, as amended in 2002 (Pub. L. 107-110, 42 U.S.C. 604(h)(4));
  - y. Per capita payments made from the proceeds of Indian Tribal Trust Cases as described in PIH Notice 2013-30 “Exclusion from Income of Payments under Recent Tribal Trust Settlements” (25 U.S.C. 117b(a)); and Major disaster and emergency assistance received by individuals and families under the Robert T. Stafford Disaster Relief

and Emergency Assistance Act (Pub. L. 93–288, as amended) and comparable disaster assistance provided by states, local governments, and disaster assistance organizations (42 U.S.C. 5155(d)). The Greensboro Housing Authority will not provide exclusions from income in addition to those already provided for by HUD.

- z. ABLÉ accounts created under the Achieving a Better Life Experience Act of 2014 (ABLE Act) are excluded from the calculation of both income and assets.
- aa. Amounts directly received by the family as a result of State refundable tax credits or State tax refunds at the time that they are received, Veterans' aide and attendant care, distributions of principal from non-revocable trusts, including Special Needs Trusts, State and/or Tribal kinship or guardianship care payments, value of any "baby bond" account, loan proceeds disbursed to or on behalf of a borrower, or loan proceeds received by a third party instead of the family, such as student loans or car loans, payments received by Tribal members resulting from mismanagement of assets held in trust by the U.S., Income received from any account under a retirement plan recognized by the IRS, including individual retirement arrangements (IRAs), employer retirement plans, and retirement plans for self-employed individuals; however, any distribution of periodic payments from these retirement accounts are included as income at the time they are received by the family.

#### **9.4 DEDUCTIONS FROM ANNUAL INCOME**

The following deductions will be made from annual income:

- A. \$480 for each dependent
- B. Elderly and/or disabled family deduction increased to \$525 versus \$400-deduction will adjust based on Consumer Price Index (CPI) for urban wage earners and clerical worker rounded to the next lowest multiple \$25.
- C. Hardship exemptions:
  - Health and medical care expenses or reasonable attendant care and auxiliary apparatus expenses increased, or
  - Financial hardship is a result of a change in circumstance that would not otherwise trigger an interim reexamination unable to pay rent because of unanticipated medical/disability expenses and families who are no longer eligible for the childcare expense deduction.

- GHA may extend the hardship exemption for childcare income deduction for additional 90-day periods if the family demonstrates that they are unable to pay their rent because of loss of the childcare expense deduction, and the childcare expense is still necessary even though the family member is no longer employed or furthering his or her education.
- D. The sum of the following, to the extent the sum exceeds three percent of annual income:
- Unreimbursed medical expenses of any elderly family or disabled family; and including any fee paid by the participant for the Medicare Prescription Drug Program; and
  - Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed, but this allowance may not exceed the earned income received by family members who are 18 years of age or older who are able to work because of such attendant care or auxiliary apparatus.
  - Reasonable childcare expenses necessary for children 12 and younger to enable a member of the family to be employed or to further his or her education. This deduction shall not exceed the amount of employment income that is included in annual income.
  - Persons with disabilities already participating in the program, the incremental earnings due to employment during a cumulative 12-month period following the date of initial hire shall be excluded. This exclusion is only available to the following families:
    - Families whose income increases as a result of employment of a disabled family member who was previously unemployed. Previously unemployed includes a person who has earned in the twelve months previous to employment, no more than would be received for 10 hours of work per week for 50 weeks at the established minimum wage;
    - Families whose income increases during the participation of a disabled family member in any economic self-sufficiency or other job training program.
      - Persons with disabilities who are or were, within 6 months, assisted under a State TANF or Welfare-to-Work program for at least \$500.
      - During the second cumulative 12-month period after the date of initial hire, 50% of the increased income shall be excluded from income.

The disallowance of increased income of an individual family member is limited to a lifetime 48-month period. It only applies for 12 months of the 100% exclusion

and 12 months of the 50% exclusion. This is true if it is implemented prior to July 1, 2017. After that date, the lifetime Disregard will end 24 months after it began.

#### **9.5 RECEIPT OF A LETTER OR NOTICE FROM HUD**

- A. If a HCVP participant receives a letter or notice from HUD concerning the amount or verification of family income, the letter shall be brought to the person responsible for income verification within thirty (30) calendar days of receipt by the tenant.
- B. The Greensboro Housing Authority shall reconcile any difference between the amount reported by the tenant and the amount listed in the HUD communication. This shall be done as promptly as possible.
- C. After the reconciliation is complete, the Greensboro Housing Authority shall if appropriate, adjust the tenant's rental contribution beginning at the start of the next month. If the reconciliation is completed during the final five (5) calendar days of the month, the new rent shall take effect on the first day of the second month following the end of the current month. In addition, if the tenant had not previously reported the proper income, the Greensboro Housing Authority shall do one of the following:
  - 1. Immediately collect the back over paid assistance paid by the agency;
  - 2. Establish a repayment plan for the tenant to pay the sum due to the agency;
  - 3. Terminate the tenant from the program for failure to report income; or
  - 4. Terminate the tenant from the program for failure to report income and collect the amount of assistance over-paid by the agency.

#### **9.6 COOPERATING WITH LAW ENFORCEMENT AGENCIES**

The Greensboro Housing Authority will comply, on a case-by-case basis, with information requests from Federal, State or local law enforcement officers regarding possible fugitive felons and/or a parole or probation violators. The Greensboro Housing Authority will supply upon legitimate request (1) the current address, (2) Social Security number and (3) photograph (if available) of any recipient of assistance.

The Federal, State or local enforcement officer must submit a request that is (1) written, (2) on law enforcement agency letterhead, and (3) is signed by the requesting officer and his or her immediate supervisor. The request for information must provide the name of the fugitive felon and/or parole or probation violator being sought, and may include other personal information used for identification. The request should also comply with the following requirements:

- A. The law enforcement agency shall notify Greensboro Housing Authority that the fugitive felon and/or parole or probation violator (i) is fleeing to avoid prosecution,

- custody or confinement after conviction, under the laws of the place from which the individual flees, for a crime, or attempt to commit a crime, which is a felony under the laws of the place from which the individual flees, or which, in the case of the State of New Jersey, is a high misdemeanor; or (ii) is violating a condition of probation or parole imposed under Federal or State law; or (iii) has information that is necessary for the officer to conduct his/her official duties;
- B. The location or apprehension of the recipient is within the Greensboro Housing Authority's official duties; and,
- C. The request is made in the proper exercise of the law enforcement agency's official duties.

**9.7 COOPERATING WITH WELFARE AGENCIES**

The Greensboro Housing Authority will make its best efforts to enter into cooperation agreements with local welfare agencies under which the welfare agencies will agree:

- A. To target assistance, benefits and services to families receiving assistance in the public housing and HCVP tenant-based assistance program to achieve self-sufficiency.
- B. To provide written verification to the Greensboro Housing Authority concerning welfare benefits for families applying for or receiving assistance in our housing assistance programs.

**10.0 VERIFICATION**

The Greensboro Housing Authority will verify information related to waiting list preferences, eligibility, admission and level of benefits prior to admission. Periodically during occupancy, items related to eligibility and rent determination shall also be reviewed and verified. Income, assets, and expenses will be verified, as well as disability status, need for a live-in aide and other reasonable accommodations, full-time student status of family members 18 years of age and older, Social Security Numbers, citizenship/eligible non-citizen status. Age and relationship will only be verified in those instances where needed to make a determination of level of assistance.

**10.1 ACCEPTABLE METHODS OF VERIFICATION**

Age, relationship, U.S. citizenship, and Social Security numbers will generally be verified with documentation provided by the family. For citizenship, the family's certification will be accepted. (Or, for citizenship, documentation such as listed below will be

required.) Verification of these items will include photocopies of the Social Security cards and other documents presented by the family, the INS SAVE approval code, and forms signed by the family.

Other information will be verified by the following verification methods acceptable to

HUD and other applicable programs, in the order of preference indicated:

**1. Up-front Income Verifications (UIV)**

UIV is the verification of income through an independent source that systematically maintains income information in computerized form for a large number of individuals.

Current UIV resources include the following:

- a. Enterprise Income Verification (EIV)** – The EIV System is a web- based application, which provides PHAs with employment, wage, unemployment compensation and social security benefit information of tenants who participate in the Public Housing and various Section 8 programs under the jurisdiction of the Office of Public and Indian Housing (PIH). Information in EIV is derived from computer matching programs initiated by HUD with the Social Security Administration (SSA) and the U.S. Department of Health and Human Services (HHS), for all program participants with valid personal identifying information (name, date of birth (DOB), and social security number (SSN)) reported on the form HUD-50058. Use of the EIV system in its entirety is mandatory for all annual and interim re-examinations. The Greensboro Housing Authority will generate all mandatory EIV reports as required. Whether or not an admission is homeless will be noted in the 50058.
- b. State Wage Information Collection Agencies (SWICAs)**
- c. State systems for the Temporary Assistance for Needy Families (TANF) program**
- d. Credit Bureau Information (CBA) credit reports**
- e. Internal Revenue Service (IRS) Tax Transcript**
- f. Private sector databases (e.g. The Work Number)**

GHA will use additional UIV resources as they become available. This will be done before, during and/or after examinations and/or re-examinations of household income as appropriate.

It is important to note that UIV data will only be used to verify a participant's eligibility for participation in a rental assistance program and to determine the level of assistance the participant is entitled to receive and only by properly trained persons whose duties require access to this information. Any other use, unless approved by the HUD Headquarters UIV Security System Administrator, is specifically prohibited and will not occur.

No adverse action can be taken against a participant until the Greensboro Housing Authority has independently verified the UIV information and the participant has

been granted an opportunity to contest any adverse findings through the established grievance procedure. The consequences of adverse findings may include GHA requiring the immediate payment of any over-subsidy, the entering into a repayment agreement, eviction, criminal prosecution, or any other appropriate remedy.

Furthermore, the information the GHA derives from the UIV system will be protected to ensure that it is utilized solely for official purposes and not disclosed in any way that would violate the privacy of the affected individuals.

The EIV Income Report must remain in the tenant file for the duration of tenancy and no longer than three years. The Greensboro Housing Authority is required to maintain at a minimum, the last three years of the form HUD-50058 and supporting documentation for all annual and interim reexaminations of family income. All records are to be maintained for a period of at least three years from the effective date of the action. Once the data has served its purpose, it shall be destroyed by either burning or shredding the data.

## **2. Third Party Written Verifications**

An original or authentic document generated by a third-party source dated either within the 90-day period preceding the reexamination or GHA request date. Such documentation may be in the possession of the participant (or applicant) and is commonly referred to as participant-provided documents. It is the HUD's position that such participant-provided documents are written third-party verification since these documents originated from a third-party source. The Greensboro Housing Authority may, at its discretion, reject any participant-provided documents and follow up directly with the source to obtain necessary verification of information. Examples of acceptable participant-provided documentation (generated by a third-party source) include, but are not limited to: pay stubs, payroll summary report,

employer notice/letter of hire/termination, SSA benefit verification letter, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices. Current acceptable participant-provided documents may be used for income and rent determinations.

The Greensboro Housing Authority will obtain four current and consecutive pay stubs for determining annual income from wages. For new income sources or when four pay stubs are not available, GHA will project income based on the information from a traditional written third-party verification form or the best available information.

**Note:** Documents older than 90 days (from GHA interview/determination or request date) is unacceptable for confirming effective dates of income.

Third-party written verifications may also be used to supplement Up-front Income Verifications. They will be utilized when there is a discrepancy of \$200 per month or more and the participant disputes the UIV results.



### **3. Written Third-Party Verification Form**

Also known as traditional third-party verification, a standardized form to collect information from a third-party source is distributed by the Greensboro Housing Authority. The form is completed by the third-party by hand (in writing or typeset) when sent the form by GHA.

HUD recognizes that third-party verification request forms sent to third-party sources often are not returned. In other instances, the person who completes the verification form may provide incomplete information; or some participants may collude with the third-party source to provide false information; or the participant intercepts the form and provides false information.

HUD requires the Greensboro Housing Authority to rely on documents that originate from a third-party source's computerized system and/or database, as this process reduces the likelihood of incorrect or falsified information being provided on the third-party verification request form. The use of acceptable participant-provided documents, which originate from a third-party source, will improve the integrity of information used to determine a family's income and rent and ultimately reduce improper subsidy payments. This verification process will also streamline the income verification process.

The Greensboro Housing Authority will allow thirty (30) calendar days for the return of third-party written verifications prior to continuing on to the next type of verification.

If the family reports that any of their income consists of contributions received from relatives or acquaintances, GHA will require the family to submit the name and address of the contributor or contributors and a copy of the contributor's identification (i.e., driver's license or State identification card).

### **4. Third-Party Oral Verifications**

This type of verification includes direct contact with the source, in person or by telephone. When this method is used, staff members will be required to document in writing with whom they spoke, the date of the conversation, the telephone number and the facts obtained.

GHA will allow thirty (30) calendar days for the return of third-party oral verifications prior to continuing on to the next type of verification.

### **5. Review of Documents**

When UIV, written and oral third-party verifications are not available within the thirty (30) calendar-day period allowed in paragraphs 3 and 4 above, the Housing Authority will use the information received by the family, provided that the documents provide complete information. Photocopies of the documents,

excluding government checks, provided by the family will be maintained in the file. In cases in which documents are viewed and cannot be photocopied, staff reviewing the documents will complete a written statement as to the contents of the document(s).

## 6. Self-Certification and Self-Declaration

When UIV, written and oral third-party verifications are not available within the thirty (30) calendar days period allowed in paragraphs 3 and 4 above, and hand-carried verification cannot be obtained, the Greensboro Housing Authority will accept a statement detailing information needed, signed by the head, spouse, co-head, or other adult family member.

Verification forms and reports received will be contained in the applicant/ participant file. Oral third-party documentation will include the same information as if the documentation had been written, i.e. name, date of contact, amount received, etc.

When any verification method other than Up-Front Income Verification is utilized, GHA will document the reason for the choice of the verification methodology in the applicant/resident’s file.

The following chart comes from PIH Notice 2010-19.

Level	Verification Technique	Ranking
<b>6</b>	<b>Upfront Income Verification (UIV)</b> using HUD’s Enterprise Income Verification (EIV) system (not available for income verifications of applicants)	<b>Highest</b> (Mandatory)
<b>5</b>	<b>Upfront Income Verification (UIV)</b> using non-HUD system	<b>Highest</b> (Optional)
<b>4</b>	<b>Written Third-Party Verification</b>	<b>High</b> (Mandatory to supplement EIV-reported income sources and when EIV has no data; Mandatory for non-EIV reported income sources; Mandatory when participant disputes EIV-reported employment and income information <b>and</b> is unable to provide acceptable documentation to support dispute)
<b>3</b>	<b>Written Third-Party Verification Form</b>	<b>Medium-Low</b> (Mandatory if written third-party verification documents are not available or rejected by the PHA; and when the applicant or participant is unable to provide acceptable documentation)
<b>2</b>	<b>Oral Third-Party Verification</b>	<b>Low</b> (Mandatory if written third-party verification is not available)

<b>1</b>	<b>Tenant Declaration</b>	<b>Low</b> (Use as a last resort when unable to obtain any type of third-party verification)
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**10.2 VERIFICATION OF CITIZENSHIP OR ELIGIBLE NONCITIZEN STATUS**

The citizenship/eligible non-citizen status of each family member regardless of age must be determined.

Prior to admission, every family member regardless of age must provide GHA with a complete and accurate Social Security Number unless they do not contend eligible immigration status. New family members must provide this verification within sixty (60) days prior to being added to the lease. GHA may grant one ninety (90) day extension if in its sole discretion it determines that the person’s failure to comply was due to circumstances that could not have reasonably been foreseen and was outside the control of the person.

If a person is already a program participant and has not disclosed his or her Social Security Number, it must be disclosed at the next re-examination or re- certification. Participants aged 62 or older as of January 31, 2010 whose initial eligibility determination was begun before January 31, 2010 are exempt from the required disclosure of their Social Security Number. This exemption continues even if the individual moves to a new assisted unit.

The best verification of the Social Security Number is the original Social Security card. If the card is not available, GHA will accept an original document issued by a federal or state government agency, which contains the name of the individual and the Social Security Number of the individual, along with other identifying information of the individual or such other evidence of the Social Security Number as HUD may prescribe in administrative instructions.

If a member of an applicant family indicates they have a Social Security Number, but cannot readily verify it, the family cannot be assisted until verification is provided. If an individual fails to provide verification within the time allowed, the family will be denied assistance or will have their assistance terminated. The Greensboro Housing Authority may grant one ninety (90) day extension from termination if in its sole discretion it determines that the person’s failure to comply was due to circumstances that could not have reasonably been foreseen and there is a reasonable likelihood that the person will be able to disclose a Social Security Number by the deadline.

Prior to being admitted, all citizens and nationals will be required to sign a declaration under penalty of perjury. (They will be required to show proof of their status by such means as birth certificate, military ID or military DD 214 Form.)

Prior to being admitted or at the first reexamination, all eligible non-citizens who are 62 years of age or older will be required to sign a declaration under penalty of perjury. They will also be required to show proof of age.

Prior to being admitted or at the first reexamination, all eligible non-citizens must sign a declaration of their status and a verification consent form and provide their original USCIS documentation. The Greensboro Housing Authority will make a copy of the individual's USCIS documentation and place the copy in the file. The Greensboro Housing Authority also will verify their status through the USCIS SAVE system. If the USCIS SAVE system cannot confirm eligibility, the Greensboro Housing Authority will mail information to the USCIS so a manual check can be made of USCIS records.

Family members who do not claim to be citizens, nationals or eligible non-citizens, or whose status cannot be confirmed, must be listed on a statement of non-eligible members and the list must be signed by the head of the household.

Non-citizen students on student visas, though in the country legally, are not eligible to be admitted to the HCVP. If they are members of families that include citizens, the rent must be pro-rated.

Any family member who does not choose to declare their status must be listed on the statement of non-eligible members.

If no family member is determined to be eligible under this Section, the family's admission will be denied.

The family's assistance will not be denied, delayed, reduced or terminated because of a delay in the process of determining eligible status under this Section, except to the extent that the delay is caused by the family.

If the Greensboro Housing Authority determines that a family member has knowingly permitted an ineligible non-citizen (other than any ineligible non-citizens listed on the lease) to permanently reside in their HCVP unit, the family's assistance will be terminated. Such family will not be eligible to be readmitted to HCVP for a period of 24 months from the date of termination.

### **10.3 TIMING OF VERIFICATION**

Verification must be dated within sixty (60) calendar days of certification or reexamination for tenant-based voucher and 120 days for project-based voucher. If the verification is older than this, the source will be contacted and asked to provide information regarding any changes.

When an interim reexamination is conducted, the GHA will verify and update only those elements reported to have changed.

### **10.4 FREQUENCY OF OBTAINING VERIFICATION**

Household income and composition will be verified at least annually.

For each family member, citizenship/eligible non-citizen status will be verified only once unless the family member is an eligible immigrant in a transitional stage of admission. In this situation, their status must be updated until they are admitted for permanent residency.

This verification will be obtained prior to admission. If the status of any family member was not determined prior to admission, verification of their status will be obtained at the next regular reexamination. Prior to a new member joining the family, their status will be verified.

For each family member, verification of Social Security Number will be obtained only once. This verification will be accomplished prior to admission. When a family member who did not have a Social Security Number at admission receives a Social Security Number, that number will be verified at the next regular reexamination.

#### **10.5 VERIFICATION OF ABSENT FAMILYMEMBER**

If an adult member who was formerly a member of the household is reported permanently absent by the family, the Greensboro Housing Authority will consider any of the following as verification:

1. Documentation verifying husband and wife are legally divorced;
2. Documentation verifying husband and wife are legally separated;
3. Order of protection/restraining order obtained by one family member against another;
4. Proof of another home address, which is limited to utility bills, bank statements, and/or driver's license/state identification card;
5. Statement from the Department of Social Services verifying absence from the household; and
6. If the adult member is incarcerated, a document from the Court or prison should be obtained stating how long they will be incarcerated.

#### **10.6 VERIFICATION OF GUARDIANSHIP**

One of the following documents will be required to determine verification of guardianship:

1. Documentation of Court-ordered assignment.
2. Verification from social services agency (DSS or CPS only).
3. Other (not all inclusive)
  - a. School placement
  - b. Child in head of household's Medicaid case

#### **10.7 SPECIAL VERIFICATION FOR ADULTSTUDENTS**

In addition to other verification procedures, student head of households must provide a written signed certification that the student does or does not receive any financial support from his or her parents or guardians and whether or not the student is receiving a scholarship. If support is received, the certification must state the amount of the anticipated support. The Greensboro Housing Authority shall verify that amount by using normal third-party verification procedures communicating directly with the supporting person(s).

## **10.8 VERIFICATION OF LIVE-IN AIDES**

In accordance with 24 CFR Section 982.316, GHA must approve the person identified as the live-in aide. GHA may disapprove an identified live-in aide if s/he has: (1) committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program; (2) committed drug-related criminal activity or violent criminal activity; or (3) currently owes rent or other amounts to GHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.

Additionally, under 24 CFR Section 982.402(a), GHA must establish subsidy standards to determine the number of bedrooms needed for families of different sizes and compositions. Consequently, GHA may not approve an unidentified live-in aide. GHA will only approve one additional bedroom for a live-in aide and no additional bedrooms will be provided for the family members of the live-in aide. GHA will ensure that housing quality standards (HQS) will not be violated and that there will be no more than two people per bedroom or living/sleeping space in the unit in accordance with 24 CFR § 982.401(d)(2)(ii). If the approval of additional family members of a live-in aide would result in the violation of HQS, the additional family members of the live-in aide will not be approved.

GHA will accept documentation from a healthcare provider validating the need for at-home service and from an at-home service provider confirming the schedule of the homecare worker. This information must show that the applicant or resident is receiving at-home services consistent with live-in aide services as recorded in 24 CFR Section 5.403.

HCVP regulations (24 CFR 5.403) define a live-in aide as a person who resides with one or more elderly persons or near-elderly persons or persons with disabilities and who is determined to be essential to the care and wellbeing of the persons; Is not obligated for the support of the persons and would not be living in the unit except to provide the necessary supportive services.

### **Relatives as Live-In Aides**

The issue of relatives or family members as live-in aides is one of the most complicated for PHAs to address. Although relatives are not automatically excluded as eligible live-in aides, they must meet the definition stated earlier. It is fairly clear that a pre-existing household member does not qualify as a live-in aide. It is more complicated when a child moves into a unit to assist an ailing parent or vice versa or when a live-in aide becomes a boyfriend or girlfriend after moving into the unit.

## **10.9 INCOME DISCREPANCY REPORT**

An EIV Income Report shall be pulled from the system before annual or interim reexamination are conducted for any family and compared with family-reported information. If the EIV report reveals an income source that was not reported by the participant or a substantial difference (defined as \$2400 or more annually) in the reported income information, the Greensboro Housing Authority will:

- A. Discuss the income discrepancy with the participant; and
- B. Request the participant to provide any documentation to confirm or dispute the unreported or underreported income and/ or income sources; and
- C. In the event the participant is unable to provide acceptable documentation to resolve the income discrepancy, the Greensboro Housing Authority will request from the third-party source, any information necessary to resolve the income discrepancy; and
- D. If applicable, determine the participant's underpayment of rent as a result of unreported or underreported income, retroactively\*; and
- E. Take any other appropriate action.

The Greensboro Housing Authority will determine the retroactive rent as far back as the existence of complete file documentation (form HUD-50058 and supporting documentation) to support such retroactive rent determinations.

The participant will be provided an opportunity to contest GHA's determination of overpayment of the HAP. Participants will be promptly notified in writing of any adverse findings made on the basis of the information verified through the aforementioned income discrepancy resolution process. The participant may contest the findings in accordance with established grievance procedures. The Greensboro Housing Authority will not terminate, deny, suspend, or reduce the family's assistance until the expiration of any notice or grievance period.

When there is an unsubstantial or no disparity between participant-reported and EIV-reported income information, the Greensboro Housing Authority will obtain from the participant, any necessary documentation to complete the income determination process. As noted previously, the Greensboro Housing Authority may reject any participant-provided documentation, if the Authority deems the documentation unacceptable. Documentation provided by the participant will only be rejected for only the following reasons:

- A. The document is not an original; or
- B. The original document has been altered, mutilated, or is not legible; or
- C. The document appears to be a forged document (i.e. does not appear to be authentic).

GHA will explain to the participant, the reason(s) the submitted documents are not acceptable and request the participant to provide additional documentation. If at any time, the participant is unable to provide acceptable documentation that the Greensboro Housing Authority deems necessary to complete the income determination process, the Authority will submit a traditional third-party verification form to the third-party source for completion and submission to GHA.

If the third-party source does not respond to the Greensboro Housing Authority's request for information, the Authority is required to document the participant file of its attempt to obtain third-party verification and that no response to the third-party verification request was received.

The Greensboro Housing Authority will then pursue lower-level verifications in accordance with the verification hierarchy.

#### **10.10 THE EIV'S DECEASED TENANTS REPORT**

GHA shall generate the EIV's Deceased Tenants Report monthly shortly before disbursing HAP payments to owners to see if the system flags deceased residents. GHA shall review the report and follow up with any listed families immediately and take any necessary corrective action as set forth in PIH Notice 2010-9 or successor publications.

In the event that a household member is misidentified as deceased on the Deceased Tenants Report, GHA will notify the individual in writing and advise the individual to contact SSA so that SSA may correct its records.

#### **10.11 STREAMLINED INCOME DETERMINATION**

The Greensboro Housing Authority has decided that any family member with a fixed source of income that constitutes 90% or more of his or her income may have his or her income determined for annual reexaminations using a streamlined income determination unless the family requests a third-part verification. A streamlined income determination will be conducted by applying, for each fixed-income source, the verified cost of living adjustment (COLA) (if there has been one announced for that year) or current rate of interest to the previously verified or adjusted income amount.

"Family member with a fixed source of income" is defined as a family member whose income includes periodic payments at reasonably predictable levels from one or more of the following sources:

- A Social Security, Supplemental Security Income, Supplemental Disability Insurance;
- B Federal, state, local, or private pension plans;
- C Annuities or other retirement benefit programs, insurance policies, disability or death benefits, or other similar types of periodic receipts; or



D Any other source of income subject to adjustment by a verifiable COLA or current rate of interest and determined appropriate by the Greensboro Housing Authority.

In the initial year, the Greensboro Housing Authority determines if any of the family member's sources of income are fixed. This determination shall be made by either:

1. comparing the amount of income from the fixed source(s) as indicated on the current year's EIV report or on a family provided document, to the amount generated during the prior year;
2. or by asking the resident.

If so determined, this shall be noted in the tenant file and the file shall state that this was determined. This shall be repeated for new sources of income reported by the resident to the Greensboro Housing Authority.

The Greensboro Housing Authority will use a COLA (if there has been one announced that year) or current rate of interest specific to the fixed source of income in order to adjust the income amount. The Greensboro Housing Authority will verify the appropriate COLA or current rate of interest from a public source or through tenant-provided, third party-generated documentation. If no such verification is available, then the Greensboro Housing Authority will obtain third-party verification of income amounts in order to calculate the change in income for the source.

For any family member whose income is determined pursuant to a streamlined income determination, the Greensboro Housing Authority will obtain third-party verification of all income amounts every 3 years. This also means that if a family member with a fixed-income source that constitutes 90% or more is added to the family during year two, for example, then the Housing Authority must obtain third-party verification of all income amounts for that family member at the next reexamination if the Housing Authority wishes to have all family members with fixed incomes on the same schedule with respect to streamlined annual reexaminations.

The Greensboro Housing Authority will continue to annually conduct third-party verification of non-fixed sources of income (wages, salaries, etc.) and deductions (medical, etc.) where applicable for all family members. Also, the Greensboro Housing Authority will continue to obtain family member signatures on the consent forms required by 24 CFR 5.230, as if this provision had not been adopted.

## **11.0 RENT AND HOUSING ASSISTANCE PAYMENT**

### ***11.1 RENT REASONABLENESS***

The Greensboro Housing Authority will not approve an initial rent or a rent increase in any of the tenant-based programs without determining that the rent amount is reasonable. Reasonableness is determined prior to the initial lease and at the following times:

- A. Before any increase in rent to owner is approved;
- B. If 60 calendar days before the contract anniversary date there is a 10% decrease in the published FMR as compared to the previous FMR; and
- C. If the Housing Authority or HUD directs that reasonableness be re-determined.

## **11.2 COMPARABILITY**

In making a rent reasonableness determination, the Housing Authority will compare the real rent for the unit to the rent of comparable units in the same or comparable neighborhoods that are not assisted under any federal, state or local program. The Housing Authority will consider the location, quality, size, number of bedrooms, age, amenities, housing services, maintenance and utilities of the unit and the comparable units. The results of this determination shall be documented in the tenant's file.

## **11.3 MAXIMUM SUBSIDY**

The payment standard adopted by the Greensboro Housing Authority or one over 110% of the Fair Market Rent that has been approved by HUD determines the maximum subsidy for a family.

For the HCVP, the minimum payment standard will be 90% of the FMR and the maximum payment standard will be 110% of the FMR without prior approval from HUD, or the exception payment standard approved by HUD.

For a voucher tenancy in an insured or non-insured 236 project, a 515 project of the Rural Development Administration, a Section 202 or 811 project, or a Section 221(d)(3) below market interest rate project the maximum subsidy may not exceed the basic rent charged including the cost of tenant-paid utilities. Furthermore, if any of the units also receive the benefit of a State, local, or federal housing subsidy (e.g., Section 8 project-based housing assistance payments contract), they are ineligible units under the HCV program.

### **11.3.1 Setting the Payment Standard**

The statute requires that the payment standard be set by the Housing Authority at between 90 and 110% of the FMR without HUD's prior approval. The Greensboro Housing Authority will review its determination of the payment standard annually after publication of the FMRs. If the current payment standards are within the basic range (90% to 110%) of the new FMRs, the new payment standards will not become effective until three (3) months after their adoption. The Greensboro Housing Authority will consider vacancy rates and rents in the market area, size and quality of units leased under the program, rents for units leased under the program, success rates of housing choice voucher holders in finding

units, and the percentage of annual income families are paying for rent under the Housing Choice Voucher Program. If it is determined that success rates will suffer or that families are having to rent low quality units located only in poverty- impacted neighborhoods, or pay over 40% of income for rent, the payment standard maybe raised to the level judged necessary to alleviate these hardships. The objective is to allow families a reasonable selection of modest, decent, and safe housing in a range of neighborhoods.

Greensboro Housing Authority will establish a payment standard of up to 120% of FMR as a reasonable accommodation for a family that includes people with disabilities. The exception payment standard will remain in effect until and unless a higher exception payment standard is warranted, requested, and subsequently approved.

If a higher payment standard is needed as a reasonable accommodation, the Greensboro Housing Authority shall submit the following to HUD:

- A. Note whether the family is an applicant or participant family.
- B. The number of household members including a live-in aide/s.
- C. The voucher size the family is issued under the PHA's subsidy standards or any exception to those standards granted through a reasonable accommodation request; e.g., as a reasonable accommodation, a single-person family may be issued a two-bedroom voucher due to a need to store medical equipment.
- D. The FMR for the voucher size or unit size, whichever is smaller.
- E. When either the disability or the need for the requested accommodation is not known or readily apparent, a statement from a health care provider regarding the need for the reasonable accommodation and the features of the unit (which may include its location) which meet that person's needs.
- F. The contract rent and utility allowance for the unit.
- G. A statement from the PHA that it has determined the rent for the unit is reasonable, and that the unit has the feature/s required to meet the needs of the person with disabilities as noted in the statement from the health care provider where such a statement is necessary (see E. above).
- H. The household's monthly adjusted income.
- I. Proposed effective date of the new lease or actual effective date of the lease renewal.

Payment standards will not be raised solely to allow the renting of luxury quality units.

If success levels are projected to be extremely high and rents are projected to be at or below 30% of income, the Housing Authority will reduce the payment standard. Payment standards for each bedroom size are evaluated separately so that the payment standard for one-bedroom size may increase or decrease while another remains unchanged. The

Greensboro Housing Authority may consider adjusting payment standards at times other than the annual review when circumstances warrant.

Before increasing any payment standard, the Housing Authority will conduct a financial feasibility test to ensure that in using the higher standard, adequate funds will continue to be available to assist families in the program.

If the Greensboro Housing Authority reduces its payment standard after HUD adjusts/reduces its FMRs the Greensboro Housing Authority will not reduce the assistance to our current participants as long as they continue to live in the unit they were occupying at the time of the reduction.

### ***11.3.2 Selecting the Correct Payment Standard for a Family***

- A. For the housing choice voucher tenancy, the payment standard for a family is the lower of:
  - 1. The payment standard for the family unit size; or
  - 2. The payment standard for the unit size rented by the family.
- B. If the unit rented by a family is located in an exception rent area, the Housing Authority will use the appropriate payment standard for the exception rent area.
- C. During the HAP contract term for a unit, the amount of the payment standard for a family is the higher of:
  - 1. The initial payment standard (at the beginning of the lease term) minus any amount by which the initial rent to owner exceeds the current rent to owner; or
  - 2. The payment standard as determined at the most recent regular reexamination of family income and composition effective after the beginning of the HAP contract term.
- D. At the next annual reexamination following a change in family size or composition during the HAP contract term and for any reexamination thereafter, paragraph C above does not apply.
- E. If there is a change in family unit size resulting from a change in family size or composition, the new family unit size will be considered when determining the payment standard at the next annual reexamination.

### ***11.3.3 Encouraging Participation in Areas of Non-Concentration***

In order to help families, find housing outside areas of high poverty or when housing choice voucher holders are having trouble finding housing for lease under the program, the Housing Authority may request that HUD approve an exception payment standard rent for

certain areas within its jurisdiction. The areas may be of any size, though generally not smaller than a census tract. The Housing Authority may request one such exception payment standard area or many. Exception payment standard rent authority may be requested for all or some unit sizes, or for all or some unit types. The exception payment standard area(s) may not contain more than 50% of the population of the FMR area.

When an exception payment standard rent has been approved and the FMR increases, the exception rent remains unchanged until such time as the Housing Authority requests and HUD approves a higher exception payment standard rent. If the FMR decreases, the exception payment standard rent authority automatically expires.

In all local areas where there are significant concentrations of low income and/or minority families, additional efforts will be taken to recruit and retain owners in non- impacted areas. In each affected local area, GHA will clearly delineate areas of concentration and neighboring areas outside these areas of concentration.

These efforts by GHA will include establishing maps that show various areas and information about facilities and services in neighboring areas such as schools, transportation, and supportive and social services.

#### ***11.4 ASSISTANCE AND RENT FORMULAS***

##### **A. Total Tenant Payment**

The total tenant payment is equal to the highest of:

1. 10% of monthly income
2. 30% of adjusted monthly income
3. Minimum rent
4. Special minimum rent for enhanced

vouchers Plus any rent above the payment standard.

##### **B. Minimum Rent.**

The Greensboro Housing Authority has set the minimum rent at \$50, except for Enhanced Vouchers, which are calculated individually. However, if the family requests a hardship exemption, the Greensboro Housing Authority will suspend the minimum rent for the family beginning the month following the family's hardship request. The suspension will continue until the Housing Authority can determine whether hardship exists and whether the hardship is of a temporary or long-term nature. During suspension, the family will not be required to pay a minimum rent and the Housing Assistance Payment will be increased accordingly.

1. A hardship exists in the following circumstances:

- a. When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State or local assistance program including a family that includes a 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;
  - b. When the family would be evicted because it is unable to pay the minimum rent;
  - c. When the income of the family has decreased because of changed circumstances, including loss of employment; and
  - d. When a death has occurred in the family.
2. No hardship. If the Housing Authority determines there is no qualifying hardship, the minimum rent will be reinstated, including requiring back payment of minimum rent to the Housing Authority for the time of suspension.
  3. Temporary hardship. If the Housing Authority determines that there is a qualifying hardship but that it is of a temporary nature, the minimum rent will not be imposed for a period of 90 days from the month following the date of the family's request. At the end of the 90-day period, the minimum rent will be imposed retroactively to the time of suspension. The Housing Authority will offer a reasonable repayment agreement for any minimum rent back payment paid by the Housing Authority on the family's behalf during the period of suspension.
  4. Long-term hardship. If the Housing Authority determines there is a long-term hardship, the family will be exempt from the minimum rent requirement until the hardship no longer exists.
  5. Appeals. The family may use the informal hearing procedure to appeal the Housing Authority's determination regarding the hardship. No escrow deposit will be required in order to access the informal hearing procedures.

C. Housing Choice Preservation Vouchers

1. Payment Standard

- a. The payment standard is the lower of:
  - i. The payment standard amount for the appropriate family unit size; or

- ii. The payment standard amount for the size of the dwelling unit actually rented by the family.
    - b. If the dwelling unit is located in an exception area, the Greensboro Housing Authority will use the appropriate payment standard for the exception area.
    - c. During the HAP contract term, the payment standard for the family is the higher of:
      - i. The initial payment standard (at the beginning of the HAP contract term), as determined in accordance with paragraph (1)(a) or (1)(b) of this section, minus any amount by which the initial rent to the owner exceeds the current rent to the owner; or
      - ii. The payment standard as determined in accordance with paragraph (1)(a) or (1)(b) of this section, as determined at the most recent regular reexamination of family income and composition effective after the beginning of the HAP contract term.
    - d. At the next regular reexamination following a change in family composition that causes a change in family unit size during the HAP contract term, and for any examination thereafter during the term:
      - i. Paragraph (c)(i) of this section does not apply; and
      - ii. The new family unit size must be used to determine the payment standard.
  - 2. The Greensboro Housing Authority will pay a monthly housing assistance payment on behalf of the family that equals the lesser of:
    - a. The payment standard minus the total tenant payment; or
    - b. The gross rent minus the total tenant payment.
- D. Manufactured Home Space Rental: Housing Choice Vouchers
- 1. The payment standard for a tenant renting a manufactured home space is the published FMR
  - 2. The space rent is the sum of the following as determined by the Housing

Authority:

- a Rent to the owner for the manufactured home space;
  - b Owner maintenance and management charges for the space;
  - c Payments made to amortize the cost of purchasing the manufactured home, including taxes and insurance (any increase due to refinancing after purchase is not included); and
  - d Utility allowance for tenant paid utilities.
3. The tenant pays the rent to owner less the HAP.
  4. HAP equals the lesser of:
    - a The payment standard minus the total tenant payment; or
    - b The rent paid for rental of the real property on which the manufactured home owned by the family is located.

E. Rent for Families under the Non-citizen Rule

A mixed family will receive full continuation of assistance if all of the following conditions are met:

1. The family was receiving assistance on June 19, 1995;
2. The family was granted continuation of assistance before November 29, 1996;
3. The family's head or spouse has eligible immigration status; and
4. The family does not include any person who does not have eligible status other than the head of household, the spouse of the head of household, any parent of the head or spouse, or any child (under the age of 18) of the head or spouse.

The family's assistance is prorated in the following manner:

1. Find the prorated housing assistance payment (HAP) by dividing the HAP by the total number of family members, and then multiplying the result by the number of eligible family members.
2. Obtain the prorated family share by subtracting the prorated HAP from the gross rent (contract rent plus utility allowance).



3. The prorated tenant rent equals the prorated family share minus the full utility allowance.

### **11.5 HOUSING AUTHORITY MISTAKES IN CALCULATING RENT**

If the Greensboro Housing Authority makes a mistake in calculating a family's rent contribution and overcharges the family, the family shall receive a refund for the amount of the mistake going back a maximum of twenty-four (24) months. The refund shall be given to the family as soon as practical.

### **11.6 UTILITY ALLOWANCE**

The Housing Authority maintains a utility allowance schedule for all tenant-paid utilities (Except telephone and cable television), for cost of tenant-supplied refrigerators and ranges, and for other tenant-paid housing services (e.g., trash collection (disposal of waste and refuse).

The utility allowance schedule is determined based on the typical cost of utilities and services paid by energy-conservative households that occupy housing of similar size and type in the same locality. In developing the schedule, the Housing Authority uses normal patterns of consumption for the community as a whole and current utility rates.

The Housing Authority reviews the utility allowance schedule annually and revises any allowance for a utility category if there has been a change of 10% or more in the utility rate since the last time the utility allowance schedule was revised. The Housing Authority maintains information supporting the annual review of utility allowances and any revisions made in its utility allowance schedule. Tenants may review this information at any time by making an appointment with the Housing Authority.

The Housing Authority uses the lower appropriate utility allowance for the voucher size or the utility allowance amount for the unit actually leased by the family.

At each reexamination, the Housing Authority applies the utility allowance from the most current utility allowance schedule.

The Housing Authority will approve a request for a utility allowance that is higher than the applicable amount on the utility allowance schedule if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family member with a disability.

The utility allowance will be subtracted from the family's share to determine the amount of the Tenant Rent. The Tenant Rent is the amount the family owes each month to the owner. The amount of the utility allowance is then still available to the family to pay the cost of their utilities. Any utility cost above the allowance is the responsibility of the tenant. Any savings resulting from utility costs below the amount of the allowance belong to the tenant. The Housing Authority has the option to pay the utility allowance directly to a utility

supplier.

## **11.7 HOUSING ASSISTANCE PAYMENTS (HAP) CONTRACT**

- A. The HAP contract is a written agreement between GHA and the owner of a unit occupied by a housing choice voucher program participant. The HAP contract must be in the form prescribed by HUD. Under the HAP contract, the PHA agrees to make housing assistance payments to the owner on behalf of a specific family leasing a specific unit. The Greensboro Housing Authority uses its payment standard schedule to calculate the monthly HAP payment to the owner.

Prior to GHA approval of the assisted tenancy and the execution of a HAP contract, GHA will ensure that the following program requirements have been met:

- a. Owner is eligible;
  - b. Unit is eligible;
  - c. Unit has been inspected by the PHA and meets HQS;
  - d. Lease includes the tenancy addendum;
  - e. Rent charged by the owner is reasonable.
- B. Upon approval of the assisted tenancy, the owner and GHA can execute the HAP contract. Housing assistance payments are due to the owner on the first day of each month. The owner's right to receive housing assistance payments depends on compliance with all the provisions of the HAP contract. The owner's endorsement of the HAP check signifies that the owner has agreed to and is in compliance with the terms of the HAP contract. No payments may be made to the owner after the family moves out of the unit or the lease term ends.

### **11.7.1 TERM OF HAP CONTRACT**

The term of the HAP contract must run concurrently with the term of the lease, including any extensions of the lease term. Occasionally, families move into units prior to HAP contract execution, and some owners require these families to sign a lease prior to moving into the unit. In these situations, GHA must request that the owner and GHA execute a new lease once the HAP contract assigned.

The HAP contract and the housing assistance payments made under the HAP contract terminate automatically in each of the following situations:

- a. Owner or tenant terminates the lease
- b. Lease expires
- c. GHA terminates the HAP contract

- d. GHA terminates assistance for the family
- e. Family moves from the unit. The owner is entitled to keep the housing assistance payment for the month when the family moves out of the unit. The term of a new HAP contract for a new unit may begin in the same month in which the participant moves out of the previously assisted unit. This is not considered a duplicative subsidy
- f. When 180 calendar days have elapsed since the PHA made the last housing assistance payment to the owner
- g. If the family is absent from the unit for longer than the maximum period permitted by the GHA in its administrative plan. The owner must reimburse the GHA for any housing assistance payment for the period after the termination
- h. Upon expiration of the annual contributions contract

GHA may decide to terminate the HAP contract in each of the following situations:

- a. Available program funding is not sufficient to support continued assistance for families in the program
- b. Unit does not meet HQS size requirements due to change in family composition
- c. Family breaks up
- d. Unit does not meet HQS
- e. Owner breaches the HAP contract.

GHA and the owner must execute GHA contract no later than 60 calendar days from the beginning of the lease term. GHA must not make any housing assistance payments to the owner until the HAP contract has been executed. If the HAP contract is executed after the beginning of the lease term, the initial housing assistance payment would include the amount due to the owner for those days in which the unit was under lease and occupied but no HAP contract was signed, up to the maximum of 60 days. Any HAP contract executed after the 60-day period is void, and GHA cannot make any housing assistance payments to the owner.

## **11.8 DISTRIBUTION OF HOUSING ASSISTANCE PAYMENT**

The Housing Authority pays the owner the lesser of the housing assistance payment or the rent to owner. If payments are not made within 10 business days of when due after the first two months of the HAP contract term, the owner may charge the Greensboro Housing Authority a late payment, agreed to in the Contract and in accordance with generally accepted practices in the Greensboro jurisdiction if the following conditions apply:

A. It is the owner's practice to charge such penalties for assisted and unassisted tenants; and

B. The owner also charges such penalties against the tenant for late payment of family rent to owner.

Late charges will not be paid when the reason for the lateness is attributable to factors beyond the control of the Greensboro Housing Authority. In cases where the unit passes HQS on the 25<sup>th</sup> day of the month or after, housing assistance payment will begin on the first of the following month.

A housing assistance payment is considered made upon being mailed by or submitted to its bank for direct deposit by the Greensboro Housing Authority.

If an owner receives HAP for any month in which the owner is ineligible to receive HAP because of a deceased tenant, GHA will immediately notify the owner in writing of the ineligible HAP and require the owner to repay the overpayment within 30 days. If the owner does not comply, GHA may deduct the amount due to the Authority from any amounts due to the owner under any other HAP contract. If there is no other HAP contract with the owner, GHA may seek and obtain additional relief by judicial order or action in accordance with state and local laws.

In instances where a deceased single member household has been deceased for a period greater than 6 months and the owner received HAP, GHA may determine that the owner has breached the HAP contract. As such, GHA may exercise any of its rights and remedies under the HAP contract, or any other available rights and remedies for such breach. GHA will notify the owner of such determination, including a brief statement of the reasons for the determination. The notice by the Authority to the owner may require the owner to take corrective action, as verified or determined by GHA, by a deadline prescribed in the notice.

If the head-of-household has been authorized to have live-in aide services, the live-in aide would not be added to the lease or be considered the last remaining member of a tenant family. Since the live-in aide would not be living in the subsidized unit except to provide the necessary supportive services to the head-of-household, if the head-of-household dies and the only remaining household member is the live-in aide, the live-in aide is not entitled or eligible for any rental assistance.

GHA will not designate the live-in aide as the new head-of-household nor pay HAP on behalf of the live- in aide for any month after the month in which the head-of-household died. GHA will notify the live- in aide s/he is required to vacate the unit at the end of month.

Unless otherwise terminated, the housing assistance payment contract shall end 180 calendar days after the last housing assistance payment is made.

## **11.9 CHANGE OF OWNERSHIP**

The Greensboro Housing Authority requires a written request by the owner who executed

the HAP contract in order to make changes regarding who is to receive the Greensboro Housing Authority's rent payment or the address as to where the rent payment should be sent.

In addition, the Greensboro Housing Authority requires a written request from the new owner to process a change of ownership. The following documents must accompany the written request:

- A. Deed of Trust showing the transfer of title or management agreement; and Tax Identification Number or Social Security Number.

New owners will be required to execute IRS form W-9. The Greensboro Housing Authority may withhold the rent payment until the taxpayer identification number is received.

## **12.0 INSPECTION POLICIES AND HOUSING QUALITY STANDARDS**

The Greensboro Housing Authority will inspect all units to ensure that they meet Housing Quality Standards (HQS) and that unit size and family size are commensurate to each other. The inspections will take place in person or remote with the use of pictures and/or video. No unit will be initially placed on the HCV Program unless HQS is met. Units will be inspected at least biennially, and at other times as needed, to determine if the units meet HQS, to verify that approved rooms for medical equipment are being used as requested and to comply with any other regulation for federally assisted housing.

The Greensboro Housing Authority must be allowed to inspect the dwelling unit at reasonable times with reasonable notice. The family and owner will be notified of the inspection appointment by first class or bulk mail. If the family cannot be at home for the scheduled inspection appointment, the family must call and reschedule the inspection or make arrangements to enable the Housing Authority to enter the unit and complete the inspection.

If the family misses the scheduled inspection and fails to reschedule the inspection, the Greensboro Housing Authority will only schedule one more inspection. If the family misses two inspections, the Greensboro Housing Authority will consider the family to have violated a Family Obligation and their assistance will be terminated.

### **12.1 TYPES OF INSPECTIONS**

There are five types of inspections the Greensboro Housing Authority will perform:

- A. Initial Inspection - An inspection that must take place to ensure that the unit passes HQS before assistance can begin.
- B. Regular Inspection - An inspection to determine that the unit continues to meet HQS.

- C. Complaint Inspection - An inspection caused by the Authority receiving a complaint on the unit by anyone.
- D. Special Inspection - An inspection caused by a third party, i.e., HUD needing to view the unit.
- E. Quality Control Inspection - Supervisory inspections based on at least the minimum number required by the HCVP Management Assessment Program (SEMAP).

**12.2 OWNER AND FAMILY RESPONSIBILITY**

**A. Owner Responsibility for HQS**

- 1. The owner must maintain the unit in accordance with HQS.
- 2. If the owner fails to maintain the dwelling unit in accordance with HQS, the Greensboro Housing Authority will take prompt and vigorous action to enforce the owner obligations. The Greensboro Housing Authority's remedies for such breach of the HQS include termination, suspension or reduction of housing assistance payments and termination of the HAP contract.

The Greensboro Housing Authority will not make any housing assistance payments for a dwelling unit that fails to meet HQS, unless the owner corrects the defect within the period specified by the Greensboro Housing Authority and the Greensboro Housing Authority verifies the correction. If a defect is life threatening, the owner must correct the defect within no more than 24 hours.

For other defects the owner must correct the defect within no more than 30 calendar days (or any Greensboro Housing Authority approved extension). If the required repair is not made in a timely manner, the rent shall be abated beginning with the next rent check.

- 3. The owner is not responsible for a breach of the HQS that is not caused by the owner, and for which the family is responsible. Furthermore, the Greensboro Housing Authority may terminate assistance to a family because of the HQS breach caused by the family.

**B. Family Responsibility for HQS**

- 1. The family is responsible for a breach of the HQS that is caused by any of the following:
  - a. The family fails to pay for any utilities that the owner is not required

- to pay for, but which are to be paid by the tenant;
  - b. The family fails to provide and maintain any appliances that the owner is not required to provide, but which are to be provided by the tenant; or
  - c. Any member of the household or a guest damages the dwelling unit or premises (damage beyond ordinary wear and tear).
2. If an HQS breach caused by the family is life threatening, the family must correct the defect within no more than 24 hours. For other family-caused defects, the family must correct the defect within no more than 30 calendar days (or any Greensboro Housing Authority approved extension).
  3. If the family has caused a breach of the HQS, the Greensboro Housing Authority will take prompt and vigorous action to enforce the family obligations. The Greensboro Housing Authority may terminate assistance for the family in accordance with 24 CFR 982.552.

**12.3 HOUSING QUALITY STANDARDS (HQS) 24 CFR 982.401**

This Section states performance and acceptability criteria for these key aspects of the following housing quality standards:

**A. Sanitary Facilities**

**1. Performance Requirement**

The dwelling unit must include sanitary facilities located in the unit. The sanitary facilities must be in proper operating condition and adequate for personal cleanliness and the disposal of human waste. The sanitary facilities must be usable in privacy.

**2. Acceptability Criteria**

- a. The bathroom must be located in a separate private room and have a flush toilet in proper operating condition.
- b. The dwelling unit must have a fixed basin in proper operating condition, with a sink trap and hot and cold running water.
- c. The dwelling unit must have a shower or a tub in proper operating condition with hot and cold running water.
- d. The facilities must utilize an approvable public or private disposal system (including a locally approvable septic system).

**B. Food Preparation and Refuse Disposal**

1. Performance Requirements
  - a. The dwelling unit must have suitable space and equipment to store, prepare, and serve foods in a sanitary manner.
  - b. There must be adequate facilities and services for the sanitary disposal of food wastes and refuse, including facilities for temporary storage where necessary (e.g., garbage cans).
2. Acceptability Criteria
  - a. The dwelling unit must have an oven, a stove or range, and a refrigerator of appropriate size for the family. All of the equipment must be in proper operating condition. Either the owner or the family may supply the equipment. A microwave oven may be substituted for a tenant-supplied oven and stove or range. A microwave oven may be substituted for an owner-supplied oven and stove or range if the tenant agrees and microwave ovens are furnished instead of an oven and stove or range to both subsidized and unsubsidized tenants in the building or premises.
  - b. The dwelling unit must have a kitchen sink in proper operating condition, with a sink trap and hot and cold running water. The sink must drain into an approvable public or private system.
  - c. The dwelling unit must have space for the storage, preparation, and serving of food.
  - d. There must be facilities and services for the sanitary disposal of food waste and refuse, including temporary storage facilities where necessary (e.g., garbage cans).

**C. Space and Security**

1. Performance Requirement

The dwelling unit must provide adequate space and security for the family.
2. Acceptability Criteria
  - a. At a minimum, the dwelling unit must have a living room, a kitchen area, and a bathroom.
  - b. The dwelling unit must have at least one bedroom or living/ sleeping room for each two persons. Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room.



- c. Dwelling unit windows that are accessible from the outside, such as basement, first floor, and fire escape windows, must be lockable (such as window units with sash pins or sash locks, and combination windows with latches). Windows that are nailed shut are acceptable only if these windows are not needed for ventilation or as an alternate exit in case of fire.
- d. The exterior doors of the dwelling unit must be lockable. Exterior doors are doors by which someone can enter or exit the dwelling unit.

**D. Thermal Environment**

1. Performance Requirement

The dwelling unit must have and be capable of maintaining a thermal environment healthy for the human body.

2. Acceptability Criteria

- a. There must be a safe system for heating the dwelling unit (and a safe cooling system, where present). The system must be in proper operating condition. The system must be able to provide adequate heat (and cooling, if applicable), either directly or indirectly, to each room, in order to assure a healthy living environment appropriate to the climate.
- b. The dwelling unit must not contain unvented room heaters that burn gas, oil, or kerosene. Electric heaters are acceptable.

**E. Illumination and Electricity**

1. Performance Requirement

Each room must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of occupants. The dwelling unit must have sufficient electrical sources so occupants can use essential electrical appliances. The electrical fixtures and wiring must ensure safety from fire.

2. Acceptability Criteria

- a. There must be at least one window in the living room and in each sleeping room.
- b. The kitchen area and the bathroom must have a permanent ceiling

or wall light fixture in proper operating condition. The kitchen area must also have at least one electrical outlet in proper operating condition.

- c. The living room and each bedroom must have at least two electrical outlets in proper operating condition. Permanent overhead or wall-mounted light fixtures may count as one of the required electrical outlets.

## **F. Structure and Materials**

### **1. Performance Requirement**

The dwelling unit must be structurally sound. The structure must not present any threat to the health and safety of the occupants and must protect the occupants from the environment.

### **2. Acceptability Criteria**

- a. Ceilings, walls, and floors must not have any serious defects such as severe bulging or leaning, large holes, loose surface materials, severe buckling, missing parts, or other serious damage.
- b. The roof must be structurally sound and weathertight.
- c. The exterior wall structure and surface must not have any serious defects such as serious leaning, buckling, sagging, large holes, or defects that may result in air infiltration or vermin infestation.
- d. The condition and equipment of interior and exterior stairs, halls, porches, walkways, etc., must not present a danger of tripping and falling. For example, broken or missing steps or loose boards are unacceptable.
- e. Elevators must be working and safe.

## **G. Interior Air Quality**

### **1. Performance Requirement**

The dwelling unit must be free of pollutants in the air at levels that threaten the health of the occupants.

### **2. Acceptability Criteria**

- a. The dwelling unit must be free from dangerous levels of air pollution

from carbon monoxide, sewer gas, fuel gas, dust, and other harmful pollutants.

- b. There must be adequate air circulation in the dwelling unit.
- c. Bathroom areas must have one window that can be opened or other adequate exhaust ventilation.
- d. Any room used for sleeping must have at least one window. If the window is designed to be opened, the window must work.

## **H. Water Supply**

### **1. Performance Requirement**

The water supply must be free from contamination.

### **2. Acceptability Criteria**

The dwelling unit must be served by an approvable public or private water supply that is sanitary and free from contamination.

## **I. Lead-based Paint**

### **1. Performance Requirement**

The Lead-Based Paint Poisoning Prevention Act, the Tenantal Lead- Based Paint Hazard Reduction Act of 1992, and implementing regulations at part 35, subparts A, B, M, and R of this title apply to units assisted under this part.

### **2. Acceptability Criteria**

The requirements apply to dwelling units built prior to 1978 that are occupied or expected to be occupied by families with children under six years of age, excluding zero-bedroom dwellings.

During initial and regular inspections of pre-1978 units that are occupied or expected to be occupied by families with children under six years of age, the inspector must conduct a visual assessment for deteriorated paint surfaces and the owner must stabilize deteriorated surfaces. Applicable areas include painted surfaces within the dwelling unit, exterior painted surfaces associated with the dwelling unit, and common areas of the building through which tenants must pass to gain access to the unit and areas frequented by tenant children under six years of age, including play areas and child care facilities.

For units occupied by environmental intervention blood lead level (lead poisoned) children under six years of age, a risk assessment must be

conducted (paid for by the PHA), and the owner must complete hazard reduction activities if lead hazards are identified during the risk assessment.

**J. Access**

1. Performance Requirement

The dwelling unit must be able to be used and maintained without unauthorized use of other private properties. The building must provide an alternate means of exit in case of fire (such as fire stairs or egress through windows).

2. Acceptability Criteria

The unit must have private access.

In case of fire, the building must contain an alternate means of exit such as fire stairs, or windows, including use of a ladder for windows above the ground floor.

**K. Site and Neighborhood**

1. Performance Requirement

The site and neighborhood must be reasonably free from disturbing noises and reverberations and other dangers to the health, safety, and general welfare of the occupants.

2. Acceptability Criteria

The site and neighborhood may not be subject to serious adverse environmental conditions, natural or manmade, such as dangerous walks or steps; instability; flooding, poor drainage, septic tank back-ups or sewage hazards; mudslides; abnormal air pollution, smoke or dust; excessive noise, vibration or vehicular traffic; excessive accumulations of trash; vermin or rodent infestation; or fire hazards.

**L. Sanitary Condition**

1. Performance Requirement

The dwelling unit and its equipment must be in sanitary condition.

2. Acceptability Criteria

The dwelling unit and its equipment must be free of vermin and rodent infestation.

**M. Smoke Detectors**

**1. Performance Requirements**

Except as provided in paragraph b below of this Section, each dwelling unit must have at least one battery-operated or hard-wired smoke detector, in proper operating condition, on each level of the dwelling unit, including basements but excepting crawl spaces and unfinished attics. Smoke detectors must be installed in accordance with and meet the requirements of the National Fire Protection Association Standard (NFPA) 74 (or its successor standards). If the dwelling unit is occupied by any hearing-impaired person, smoke detectors must have an alarm system, designed for hearing-impaired persons as specified in NFPA 74 (or successor standards).

For units assisted prior to April 24, 1993, owners who installed battery-operated or hard-wired smoke detectors prior to April 24, 1993, in compliance with HUD's smoke detector requirements, including the regulations published on July 30, 1992, (57 FR 33846), will not be required subsequently to comply with any additional requirements mandated by NFPA 74 (i.e., the owner would not be required to install a smoke detector in a basement not used for living purposes, nor would the owner be required to change the location of the smoke detectors that have already been installed on the other floors of the unit)

**12.4 EXCEPTIONS TO THE HQS ACCEPTABILITY CRITERIA**

The Greensboro Housing Authority will utilize the acceptability criteria as outlined above with applicable State and local codes. Additionally, the Greensboro Housing Authority has received HUD approval to require the following additional criteria:

- A.** In each room, there will be at least one exterior window that can be opened and that contains a screen.
- B.** Adequate heat shall be considered to be 68degrees.
- C.** In units where the tenant must pay for utilities, each unit must have separate metering device(s) for measuring utility consumption.
- D.** A 3/4" overflow pipe must be present on the hot water heater safety valves and installed down to within 6 inches of the floor.

- E. Basement space must meet the same criteria as regular sleeping spaces.

## **12.5 TIME FRAMES AND CORRECTIONS OF HQS FAIL ITEMS**

### **A. Correcting Initial HQS Fail Items**

The Greensboro Housing Authority will schedule a timely inspection of the unit on the date the owner indicates that the unit will be ready for inspection, or as soon as possible thereafter (within 7 to 10 working days) upon receipt of a Request for Tenancy Approval. The owner and tenant will be notified in writing of the results of the inspection. If the unit fails HQS, the owner will be advised to notify the Greensboro Housing Authority to reschedule a re-inspection when the repairs have been properly completed.

On an initial inspection, the owner will be given up to 30 calendar days to correct the items noted as failed, depending on the extent of the repairs that are required to be made. No unit will be placed in the program until the unit meets the HQS requirements.

### **B. HQS Fail Items for Units under Contract**

The owner or tenant will be given time to correct the failed items cited on the inspection report for a unit already under contract. If the failed items endanger the family's health or safety (using the emergency item list in Section 12.6), the owner or tenant will be given 24 hours to correct the violations. For less serious failures, the owner or tenant will be given up to 30 calendar days to correct the failed item(s).

If the owner fails to correct the HQS failed items after proper notification has been given, the Greensboro Housing Authority will abate payment and terminate the contract in accordance with Sections 12.6 and 16.0

If the tenant fails to correct the HQS failed items that are family-caused after proper notification has been given, the Greensboro Housing Authority will terminate assistance for the family in accordance with Sections 12.2(B) and 16.0.

### **C. Time Frames for Corrections**

1. Emergency repair items must be abated within 24 hours.
2. Repair of refrigerators, range and oven, or a major plumbing fixture supplied by the owner must be abated within 72 hours.
3. Non-emergency items must be completed within 10 calendar days of the initial inspection.
4. For major repairs, the owner will have up to 30 calendar days to complete.

An inspector may approve an extension beyond 30 days for good cause.

**D. Extensions**

At the sole discretion of the Greensboro Housing Authority, extensions of up to 30 calendar days may be granted to permit an owner to complete repairs if the owner has made a good faith effort to initiate repairs. If repairs are not completed within 60 calendar days after the initial inspection date, the Greensboro Housing Authority will abate the rent and cancel the HAP contract for owner noncompliance. Appropriate extensions will be granted if a severe weather

condition exists for such items as exterior painting and outside concrete work for porches, steps, and sidewalks.

**E. Use of Photo**

GHA will use photos only to document specific HQS deficiencies identified on the inspection form to include damages to the unit or unusual circumstances. The photos will also be used to verify that the deficiencies have been corrected properly. The landlord will be permitted to submit photos of the corrected HQS deficiencies to GHA within a specified time frame, eliminating the need for the inspectors to conduct a reinspection of the unit.

**12.6 EMERGENCY FAIL ITEMS**

The following items are to be considered examples of emergency items that need to be abated within 24 hours:

- A. No hot or cold water
- B. No electricity
- C. Inability to maintain adequate heat when outside temperature is below 40 degrees
- D. Major plumbing leak
- E. Natural gas, propane, or LP gas leak
- F. Broken lock(s) on first floor doors or windows
- G. Broken windows that unduly allow weather elements into the unit
- H. Electrical outlet smoking or sparking
- I. Exposed electrical wires which could result in shock or fire

- J. Unusable toilet when only one toilet is present in the unit
- K. Security risks such as broken doors or windows that would allow intrusion
- L. Waterlogged ceilings in eminent danger of falling
- M. Other conditions which pose an immediate threat to health or safety

## **12.7 ABATEMENT**

When a unit fails to meet HQS and the owner has been given an opportunity to correct the deficiencies but has failed to do so within the required timeframe, the rent for the dwelling unit will be abated as of the first day of the next month.

If the corrections of deficiencies are not made, the abatement will continue until the HAP contract is terminated. When the deficiencies are corrected, the Greensboro Housing Authority will end the abatement the day the unit passes inspection. Rent will resume the day the unit passes inspection and be paid the first day of the next month.

For tenant caused HQS deficiencies, the owner will not be held accountable, and the rent will not be abated. The tenant is held to the same standard and timeframes for correction of deficiencies as owners. If repairs are not completed by the deadline, the Greensboro Housing Authority will send a notice of termination to both the tenant and the owner. The tenant will be given the opportunity to request an informal hearing.

HAP contracts will be terminated after giving the owner thirty (30) calendar days' notice from the first day of a month. It will be sent with the Notice of Abatement. Termination will end any abatement action.

## **12.8 ALTERNATIVE INSPECTIONS METHOD**

The Greensboro Housing Authority will not conduct regular inspections for units otherwise inspected under the Low-Income Housing Tax Credit Program, or HUD for a two-period from the last such inspection. The Greensboro Housing Authority will otherwise conduct all the other types of inspections called for in Section 12.1.

# **13.0 RECERTIFICATION**

## **13.1 CHANGES IN LEASE OR RENT**

If the tenant and owner agree to any changes in the lease, all changes must be in writing, and the owner must immediately give the Greensboro Housing Authority a copy of the changes. The lease, including any changes, must be in accordance with this Administrative Plan.



Owners must notify the Greensboro Housing Authority of any changes in the amount of the rent at least sixty (60) calendar days before the changes go into effect. Any such changes are subject to the Greensboro Housing Authority determining them to be reasonable.

Assistance shall not be continued unless the Greensboro Housing Authority has approved a new tenancy in accordance with program requirements and has executed a new HAP contract with the owner if any of the following changes are made:

- A. Requirements governing tenant or owner responsibilities for utilities or appliances;
- B. In the lease terms reducing the length of the lease;
- C. If the tenant moves to a new unit, even if the unit is in the same building or complex.

The approval of the Greensboro Housing Authority is not required for changes other than those specified in A, B, or C above.

### **13.2 ANNUAL REEXAMINATION**

At least annually (within 365 calendar days of the anniversary date of the HAP contract) the Greensboro Housing Authority will conduct a reexamination of family income and circumstances. The results of the reexamination determine (1) the rent the family will pay, and (2) whether the family subsidy is correct based on the family unit size. A reexamination will be conducted for all moves except those falling on the same date as that of the current reexamination date.

The Greensboro Housing Authority will send a notification letter to the family letting them know that it is time for their annual reexamination and scheduling an appointment. The letter includes forms for the family to complete in preparation for the interview.

During the interview, the family will provide all information regarding income, assets, deductions (eligible expenses), or other information necessary to determine the family's share of rent, and all other information necessary to comply with regulations for federally assisted housing. The family will sign the HUD consent form and other consent forms that later will be mailed to the sources that will verify the family circumstances. GHA will conduct a criminal background check on all family members 15 years of age and older. The background check will include sex offender registry screening.

Upon receipt of verification, the Greensboro Housing Authority will determine the family's annual income and will calculate their family share. A new reexamination will be conducted for any moves occurring after the effective reexamination date.

### **13.2.1 Effective Date of Rent Changes for Annual Reexaminations**

The new family share will generally be effective upon the anniversary date with 30 calendar days' notice of any rent increase to the family.

If the rent determination is delayed due to a reason beyond the control of the family, then any rent increase will be effective the first of the month after the month in which the family receives a 30-day notice of the amount. If the new rent is a reduction and the delay is beyond the control of the family, the reduction will be effective as scheduled on the anniversary date.

If the family caused the delay, then any increase will be effective on the anniversary date. Any reduction will be effective the first of the month after the rent amount is determined.

### **13.2.2 Missed Appointments**

If the family fails to respond to the letter and fails to attend the interview, a second letter will be mailed. The second letter will advise of a new time and date for the interview. The letter will also advise that failure by the family to attend the second scheduled interview will result in the Greensboro Housing Authority acting to terminate the family's assistance. If there is no response to the second letter, a termination notice will be issued to both the family and the owner. The termination notice will inform the family of its right to request an informal hearing.

### ***13.2.3 INTERIM REEXAMINATIONS***

During an interim reexamination only, the information affected by the changes being reported will be reviewed and verified.

Families will be required to report any increase in income or decreases in allowable expenses between annual reexaminations.

Families are required to report the following changes to the Greensboro Housing Authority within 10 business days between regular reexaminations. These changes will trigger an interim reexamination.

- A. An increase in income of \$100 per month or above must be reported within 10 days of its occurrence.
- B. A member has been added to the family through birth or adoption or court-awarded custody.
- C. A household member is leaving or has left the family unit.

#### D. Family break-up

In circumstances of a family break-up, the Greensboro Housing Authority will make a determination of which family member will retain the housing choice voucher, taking into consideration the following factors:

1. To whom the housing choice voucher was issued.
2. The interest of minor children or of ill, elderly, or disabled family members.
3. Whether the assistance should remain with the family members remaining in the unit.
4. If the family break-up results from an occurrence of domestic violence, dating violence, or stalking, GHA will ensure that the victim retains assistance. The factors to be considered in making this decision include:
  - a. Whether the assistance should remain with family members remaining in the original assisted unit.
  - b. The interest of minor children or of ill, elderly, or disabled family members.
  - c. Whether family members are forced to leave the unit as a result of actual or threatened domestic violence, dating violence, or stalking.
  - d. Whether any of the family members are receiving protection as victims of domestic violence, dating violence, or stalking and whether the abuser is still in the household.

If a court determines the disposition of property between members of the assisted family in a divorce or separation under a settlement of judicial decree, the Greensboro Housing Authority will be bound by the court's determination of which family members continue to receive assistance in the program.

Because of the number of possible different circumstances in which a determination will have to be made, the Greensboro Housing Authority will make determinations on a case-by-case basis.

The Greensboro Housing Authority will issue a determination within 10 business days of the request for a determination. The family member requesting the determination may request an informal hearing in compliance with the informal hearings in Section 15.2.

#### E. Changes in Family and Household Composition

Once selected from the waiting list, GHA will allow applicants to add family members as a result of birth, adoption, legal custody, guardianship (as defined by

Section 10.6) or marriage. Other family members may be added in limited circumstances, at the discretion of GHA on a case-by-case basis and determined by the Chief Operating Officer.

Such circumstances include, but are not limited to, family members with disabilities, elderly parents, and adult children returning from military service.

In order to add a household member, the family must request that the new member be added to the household. A resident requesting a live-in aide will be required to provide verification of the need for a live-in aide. Before adding the new member to the lease, the individual must complete an interim form stating their income, assets, and all other information required of an applicant. The individual must provide their Social Security Number if they have one, and must verify their citizenship/eligible immigrant status (Their housing will not be delayed due to delays in verifying eligible immigrant status other than delays caused by the family). The new family member will go through the screening process similar to the process for applicants. The Greensboro Housing Authority will determine the eligibility of the individual before allowing them to be added to the lease. If the individual is found to be ineligible or does not pass the screening criteria, they will be advised in writing and given the opportunity for an informal review. If they are found to be eligible and do pass the screening criteria, the Greensboro Housing Authority will grant approval to add their name to the household. Failure to comply may result in termination from the Housing Choice Voucher Program. At the same time, the family's annual income will be recalculated taking into account the income and circumstances of the new family member. The effective date of the new rent will be in accordance with paragraph below 13.3.3.

Families are not required to, but may at any time, request an interim reexamination based on a decrease in income, an increase in allowable expenses, or other changes in family circumstances. Upon such request, the Greensboro Housing Authority will take timely action to process the interim reexamination and recalculate the family share.

#### **13.2.4 Zero Income Requirements**

- A. When families report zero income and have no income excluded for rent computation, GHA has an obligation to pursue verification of income that reflects the family's lifestyle. Zero income families will be required to document on the Zero Income Integrity Information form expenses for: telephone, cable TV, food, clothing, transportation, health care, child care, debts, household items, etc. and whether any of these costs are being paid by an individual outside the family.

If there is no excluded income, the specialist must determine how the family is

maintaining their lifestyle when the family's regular expenditures conflict with their claim of zero income.

### **13.2.5 Special Reexaminations**

If a family's income is too unstable to project for 12 months, including families that temporarily have no income or have a temporary decrease in income, the Greensboro Housing Authority may schedule special reexaminations every 90 calendar days until the income stabilizes and an annual income can be determined.

### **13.2.6 Effective Date of Rent Changes Due to Interim or Special Reexaminations**

Unless there is a delay in reexamination processing caused by the family, any rent increase will be effective the first of the second month after the month in which the family receives notice of the new rent amount. If the family causes a delay, then the rent increase will be effective on the date it would have been effective had the process not been delayed (even if this means a retroactive increase).

If the new rent is a reduction and any delay is beyond the control of the family, the reduction will be effective the first of the month after the interim reexamination should have been completed.

If the new rent is a reduction and the family caused the delay or did not report the change in a timely manner, the change will be effective the first of the month after the rent amount is determined.

## **14.0 TERMINATION OF ASSISTANCE TO THE FAMILY BY THE GREENSBORO HOUSING AUTHORITY**

### **14.1 GENERAL**

The Greensboro Housing Authority must terminate program assistance for a participating family because of any of the following actions or inactions by the household:

- A. If the family was evicted from housing assisted under the HCVP for serious or repeated violations of the lease;
- B. If a family member fails to sign and submit consent forms required for obtaining information on family status as part of any reexamination.
- C. If a family fails to establish citizenship or eligible immigrant status and is not eligible for or does not elect continuation of assistance, pro-ration of assistance, or temporary deferral of assistance. If the Greensboro Housing Authority determines that a family member has knowingly permitted an ineligible noncitizen (other than any ineligible

noncitizens listed on the lease) to permanently reside in their HCVP unit, the family's

assistance will be terminated. Such family will not be eligible to be readmitted to Section 8 for a period of 24 months from the date of termination;

- D. Have a household member who is currently engaging in illegal use of a drug;
- E. Have a household member whose pattern of illegal drug use interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents;
- F. Have a household member who has ever been convicted of drug-related criminal activity for the manufacture or production of methamphetamine on the premises of federally assisted housing;
- G. Have a household member who is subject to a lifetime registration requirement or is currently registered under a State sex offender registration program. Also, during the recertification, each household shall be asked whether any member is subject to the lifetime registration requirement or is currently registered under a state registration program. GHA will verify this information using the Dru Sjodin National Sex Offender Database and document this information in the same method used at admission. For any admissions after June 25, 2001 (the effective date of the Screening and Eviction for Drug Abuse and Other Criminal Activity final rule), if the recertification screening reveals that the tenant or a member of the tenant's household is subject to a lifetime sex offender registration requirement or is currently registered under a State sex offender registration program, or that the tenant has falsified information or otherwise failed to disclose his or her criminal history on their application and/or recertification forms, GHA will pursue eviction of the household. If a family is about to be evicted from housing based on either the criminal check or the sex offender registration program, the applicant will be informed of this fact and given an opportunity to dispute the accuracy of the information before the eviction occurs;
- H. If any member of the family commits drug-related or violent criminal activity in violation of Section 4.6 of this Administrative Plan and 24 CFR 982.551;
- I. Have a household member whose abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents;
- J. Have a household member who is a fugitive felon, parole violator or person fleeing to avoid prosecution, or custody or confinement after conviction, for a crime, or attempt to commit a crime, that is a felony under the laws of the place from which the individual flees;
- K. If the family violates GHA's policy on absence from the assisted unit for more than the maximum of 180 consecutive calendar days;
- L. Have a family member who violates any family obligations under the program;

- M. Have a family member who has been evicted from federally assisted housing in the last five years;
- N. Have a family member whose program assistance has ever been terminated by GHA of any other PHA;
- O. Have a family member that has committed fraud, bribery, or any other corrupt or criminal act in connection with any Federal housing program;
- P. Currently owes rent or other amounts to the Greensboro Housing Authority as a result of unreported income in excess of \$2,400 annually, or \$200 monthly, and refuses to sign a repayment agreement to the Greensboro Housing Authority in connection with HCVP or public housing assistance under the 1937 Act;
- Q. Have not reimbursed any Greensboro Housing Authority for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease;
- R. Have engaged in or threatened abusive or violent behavior towards any Greensboro Housing Authority staff member or resident;

For purposes of this section, the Greensboro Housing Authority may terminate assistance for criminal activity by a household member as authorized in this section if the Greensboro Housing Authority determines, based on a preponderance of the evidence, that the household member has engaged in the activity, regardless of whether the household member has been arrested or convicted of such activity.

An arrest record, alone, will not serve as sufficient evidence of criminal activity that can support a termination decision. Before the Greensboro Housing Authority terminates the assistance of an individual or household on the basis of criminal activity by a household member or guest, it will determine that the relevant individual actually engaged in such activity.

An arrest record can trigger an inquiry into whether there is sufficient evidence to determine that a person engaged in disqualifying criminal activity, but is not itself evidence on which to base a determination. The Greensboro Housing Authority can utilize other evidence, such as police reports detailing the circumstances of the arrest, witness statements, and other relevant documentation to assist them in making a determination that disqualifying conduct occurred. Reliable evidence of a conviction for criminal conduct that would disqualify an individual for tenancy may also be the basis for determining that the disqualifying conduct in fact occurred.

If the Greensboro Housing Authority proposes to terminate assistance for criminal activity as shown by a criminal record, the Greensboro Housing Authority will notify the household of the proposed action to be based on the information and must provide the person with the criminal record (i.e., the family member) and the head of household with a copy of the criminal record and

an opportunity to dispute the accuracy and relevance of that record, in accordance with the procedures established for the Informal Hearing for Participants. The household will have ten (10) calendar days to dispute the accuracy and relevance of the record in writing.

The Greensboro Housing Authority may at any time terminate program assistance for a participant because of any of the following actions or inactions by the household:

Have breached an agreement with Greensboro Housing Authority to pay amounts owed to a Housing Authority, or amounts paid to an owner by a Housing Authority. In circumstances of a family break-up, the Greensboro Housing Authority will make a determination of which family member will retain the housing choice voucher, taking into consideration the following factors:

- A. To whom the housing choice voucher was issued.
- B. The interest of minor children or of ill, elderly, or disabled family members.
- C. Whether the assistance should remain with the family members remaining in the unit.
- D. Whether family members were forced to leave the unit as a result of actual or threatened physical violence by a spouse or other member(s) of the household.

If a court determines the disposition of property between members of the assisted family in a divorce or separation under a settlement of judicial decree, GHA will be bound by the court's determination of which family members continue to receive assistance in the program.

Also, during the recertification, each household shall be asked whether any member is subject to the lifetime registration requirement under a state registration program. A false answer to this question shall be grounds for the termination of assistance. GHA will also conduct a criminal background check on all family members 18 years of age and older which will include sex offender registry screening. If a participant is to be evicted based on either the criminal check or the sex offender registration program, the applicant will be informed of this fact and given an opportunity to dispute the accuracy of the information before the cutoff of assistance occurs.

#### Violence Against Women

An incident or incidents or actual or threatened domestic violence, dating violence, sexual assault, or stalking will not be construed as a serious or repeated violation of the lease by the victim or threatened victim of that violence, and shall not be good cause for terminating the assistance, tenancy, or occupancy rights of the victim of such violence. See Chapter 29 for GHA's policy regarding the Violence Against Women Act (VAWA).

## **15.0 COMPLAINTS AND INFORMAL HEARINGS FOR PARTICIPANTS**



## **15.1 COMPLAINTS**

The Greensboro Housing Authority will investigate and respond to complaints by tenant families, owners, and the general public. The Greensboro Housing Authority may require that complaints other than HQS violations be put in writing. Anonymous complaints are investigated whenever possible.

## **15.2 INFORMAL HEARINGS FOR PARTICIPANTS**

### **A. When a Hearing is Required**

1. The Greensboro Housing Authority will give a participant family an opportunity for an informal hearing virtually or in person to consider whether the following Greensboro Housing Authority decisions relating to the individual circumstances of a tenant family are in accordance with the law, HUD regulations, and Greensboro Housing Authority policies:
  - a. A determination of the family's annual or adjusted income, and the use of such income to compute the housing assistance payment.
  - b. A determination of the appropriate utility allowance (if any) for tenant-paid utilities from the Greensboro Housing Authority utility allowance schedule.
  - c. A determination of the family unit size under the Greensboro Housing Authority subsidy standards.
  - d. A determination to terminate assistance for a tenant family because of the family's action or failure to act.
  - e. A determination to terminate assistance because the tenant family has been absent from the assisted unit for longer than the maximum period permitted under the Greensboro Housing Authority policy and HUD rules.
2. In cases described in paragraphs 15.2(A)(1)(d), and (e) of this Section, the Greensboro Housing Authority will give the opportunity for an informal hearing before the Greensboro Housing Authority terminates housing assistance payments for the family under an outstanding HAP contract.

### **B. When a Hearing is not Required**

The Greensboro Housing Authority will not provide a tenant family an opportunity for an informal hearing for any of the following reasons:

1. Discretionary administrative determinations by the Greensboro Housing Authority.

2. General policy issues or class grievances.
3. Establishment of the Greensboro Housing Authority schedule of utility allowances for families in the program.
4. A Greensboro Housing Authority determination not to approve an extension or suspension of a housing choice voucher term.
5. A Greensboro Housing Authority determination not to approve a unit or lease.
6. A Greensboro Housing Authority determination that an assisted unit is not in compliance with HQS. (However, the Greensboro Housing Authority will provide the opportunity for an informal hearing for a decision to terminate assistance for a breach of the HQS caused by the family.)
7. A Greensboro Housing Authority determination that the unit is not in accordance with HQS because of the family size.
8. A determination by the Greensboro Housing Authority to exercise or not exercise any right or remedy against the owner under a HAP contract.

C. Notice to the Family

1. The Greensboro Housing Authority will notify the family that the family may ask for an explanation of the basis of the Greensboro Housing Authority's determination, and that if the family does not agree with the determination, the family may request an informal hearing on the decision.
2. The Greensboro Housing Authority will give the family prompt written notice that the family may request a hearing. The notice will:
  - a. Contain a brief statement of the reasons for the decision; and
  - b. If the family does not agree with the decision, the family may request an informal hearing on the decision within 10 business days of the notification.

D. Hearing Procedures

The Greensboro Housing Authority and tenants will adhere to the following procedures:

1. Discovery

- a. The family will be given the opportunity to examine before the hearing any Greensboro Housing Authority documents that are directly relevant to the hearing. The family will be allowed to copy any such document at the family's expense. If the Greensboro Housing Authority does not make the document(s) available for examination on request of the family, the Greensboro Housing Authority may not rely on the document(s) at the hearing.
- b. The Greensboro Housing Authority will be given the opportunity to examine, at the Greensboro Housing Authority's offices before the hearing, any family documents that are directly relevant to the hearing. The Greensboro Housing Authority will be allowed to copy any such document at the Greensboro Housing Authority's expense. If the family does not make the document(s) available for examination on request of the Greensboro Housing Authority, the family may not rely on the document at the hearing.

Note: The term **document** includes records and regulations.

## 2. Representation of the Family

At its own expense, a lawyer or other representative may represent the family.

## 3. Hearing Officer

- a. The hearing will be conducted by any person or persons designated by the Greensboro Housing Authority, other than a person who made or approved the decision under review or a subordinate of this person.
- b. The person who conducts the hearing will regulate the conduct of the hearing in accordance with the Greensboro Housing Authority hearing procedures.

## 4. Evidence

The Greensboro Housing Authority and the family must have the opportunity to present evidence and may question any witnesses. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

## 5. Issuance of Decision

The person who conducts the hearing must issue a written decision within 14 calendar days from the date of the hearing, stating briefly the reasons for

the decision. Factual determinations relating to the individual circumstances of the family shall be based on a preponderance of the evidence presented at the hearing.

6. Effect of the Decision

The Greensboro Housing Authority is not bound by a hearing decision:

- a. Concerning a matter for which the Greensboro Housing Authority is not required to provide an opportunity for an informal hearing under this Section, or that otherwise exceeds the authority of the person conducting the hearing under the Greensboro Housing Authority hearing procedures.
- b. Contrary to HUD regulations or requirements, or otherwise contrary to Federal, State, or local law.
- c. If the Greensboro Housing Authority determines that it is not bound by a hearing decision, the Greensboro Housing Authority will notify the family within 14 calendar days of the determination, and of the reasons for the determination.

E. Considering Circumstances

In deciding whether to terminate assistance because of action or inaction by members of the family, the Housing Authority may consider all of the circumstances in each case, including the seriousness of the case, the extent of participation or culpability of individual family members, and the effects of denial or termination of assistance on other family members who were not involved in the action or failure.

The Housing Authority may impose, as a condition of continued assistance for other family members, a requirement that family members who participated in or were culpable for the action or failure will not reside in the unit. The Housing Authority may permit the other members of a tenant family to continue receiving assistance.

If the Housing Authority seeks to terminate assistance because of illegal use, or possession for personal use, of a controlled substance, or pattern of abuse of alcohol, such use or possession or pattern of abuse must have occurred within one year before the date that the Housing Authority provides notice to the family of the Housing Authority determination to deny or terminate assistance. In determining whether to terminate assistance for these reasons the Greensboro Housing Authority will consider evidence of whether the household member:

1. Has successfully completed a supervised drug or alcohol rehabilitation program (as applicable) and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol;
  2. Has otherwise been rehabilitated successfully and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol; or
  3. Is participating in a supervised drug or alcohol rehabilitation program and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol.
- F. Informal Hearing Procedures for Denial of Assistance on the Basis of Ineligible Immigration Status

The tenant family may request that the Greensboro Housing Authority provide for an informal hearing after the family has notification of the USCIS decision on appeal, or in lieu of request of appeal to the USCIS. This request must be made by the tenant family within 30 calendar days of receipt of the *Notice of Denial or Termination of Assistance*, or within 30 calendar days of receipt of the USCIS appeal decision.

For the tenant families, the Informal Hearing Process above will be utilized with the exception that the tenant family will have up to 30 calendar days of receipt of the *Notice of Denial or Termination of Assistance*, or of the USCIS appeal decision.

## **16.0 TERMINATION OF THE LEASE AND CONTRACT**

### **16.1 UNILATERAL OR MUTUAL AGREEMENTS**

The term of the lease and the term of the HAP contract are the same. They begin on the same date, and they end on the same date. The lease may be terminated by the owner, by the tenant, or by the mutual agreement of both. The owner may only terminate the contract by terminating the lease. The HAP contract may be terminated by the

Greensboro Housing Authority. Under some circumstances the contract automatically terminates.

A. Termination of the Lease

1. By the family

The family may terminate the lease without cause upon proper notice to the owner and to the Greensboro Housing Authority after the initial lease term. The length of the notice that is required is stated in the lease (generally 30 calendar days).

2. By the owner

a. The owner **must** terminate the lease during its term on the following grounds:

- i. Serious or repeated violations of the terms or conditions of the lease;
- ii. Violation of Federal, State, or local law that imposes obligations on the tenant in connection with the occupancy or use of the unit and its premises;
- iii. Criminal activity, or alcohol abuse by the household, a guest, or another person under the control of the household that threatens the health, safety, or right to peaceful enjoyment of the premises by other persons residing in the immediate vicinity of the premises;

iii. Any drug-related or violent criminal activity on or near the premises;

An arrest record, alone, will not serve as sufficient evidence of criminal activity that can support a termination decision. Before the Greensboro Housing Authority terminates the assistance of an individual or household on the basis of criminal activity by a household member or guest, it will determine that the relevant individual actually engaged in such activity.

An arrest record can trigger an inquiry into whether there is sufficient evidence to determine that a person engaged in disqualifying criminal activity, but is not itself evidence on which to base a determination.

The Greensboro Housing Authority can utilize other evidence, such as police reports detailing the circumstances of the arrest, witness statements, and other relevant documentation to assist them in deciding that disqualifying conduct occurred. Reliable evidence of a conviction for criminal conduct that would disqualify an individual for tenancy may also be the basis for determining that the disqualifying conduct in fact occurred.

v. Other good cause. Other good cause may include but is not limited to the following. These are **NOT** grounds for

termination during the initial term:

- (1) Failure by the family to accept the offer of a new lease;
- (2) Family history of disturbances of neighbors or destruction of property, or living or housekeeping habits resulting in damage to the property or unit;
- (3) The owner's desire to utilize the unit for personal or family use or for a purpose other than use as a tenant rental unit;
- (4) A business or economic reason such as sale of the property, renovation of the unit, desire to rent at a higher rental amount.

The owner may terminate tenancy and evict by judicial action a family for criminal activity by a covered person in accordance with this section if the owner determines that the covered person has engaged in the criminal activity, regardless of whether the covered person has been arrested or convicted for such activity and without satisfying the standard of proof used for a criminal conviction. However, an arrest alone is insufficient evidence to terminate a tenancy.

- b. During the first year the owner may not terminate tenancy for other good cause unless the reason is because of something the household did or failed to do including:
  - i. Disturbing neighbors
  - ii. Destroying property or engaging in activities that result in damage to unit or premises, and
  - iii. Carrying out living or housekeeping habits that causes damage to unit or premises.
- c. The owner may only evict the tenant by instituting court action after or simultaneously providing written notice to the tenant specifying the grounds for termination. The owner must give the Greensboro Housing Authority a copy of any owner eviction notices to the tenant at the same time that the owner gives the notice to the tenant.
- d. The owner may terminate the contract at the end of the initial lease term or any extension of the lease term without cause by providing notice to the family that the lease term will not be renewed.

3. By mutual agreement

The family and the owner may at any time mutually agree to terminate the lease.

B. Termination of the Contract

1. Automatic termination of the contract

- a. If the Greensboro Housing Authority terminates assistance to the family, the contract terminates automatically.
- b. If the family moves out of the unit, the contract terminates automatically.
- c. 180 calendar days after the last housing assistance payment to the owner.
- d. The owner evicts the family.

2. Termination of the contract by the owner

The owner may only terminate tenancy in accordance with the lease and State and local law.

3. Termination of the HAP contract by the Greensboro Housing Authority

- a. The Housing Authority **may** terminate the HAP contract because:
  - i. The unit does not meet HQS space standards because of an increase in family size or change in family composition.
  - ii. When the family breaks up and the Greensboro Housing Authority determines that the family members who move from the unit will continue to receive the assistance.
  - iii. The Greensboro Housing Authority determines that there is insufficient funding in their contract with HUD to support continued assistance for families in the program.
  - iv. The owner has breached the contract in any of the following ways:
    - a. If the owner has violated any obligation under the HAP contract for the dwelling unit, including the owner's obligation to maintain the unit in accordance with the HQS.



- b. If the owner has violated any obligation under any other housing assistance payments contract under HCV of the 1937 Act.
  - c. If the owner has committed fraud, bribery, or any other corrupt or criminal act in connection with any Federal Housing Choice Voucher Program.
  - d. For projects with mortgages insured by HUD or loans made by HUD, if the owner has failed to comply with the regulations for the applicable mortgage insurance or loan program, with the mortgage or mortgage note, or with the regulatory agreement.
  - e. If the owner has engaged in drug-related or violent criminal activity.
- b. The Greensboro Housing Authority **must** terminate the HAP contract because:
- i. A family fails to sign or submit consent forms for obtaining information on family status as part of the reexamination process;
  - ii. The family fails to declare citizenship or provide documentation of eligible non-citizen status within required time frames;
  - iii. The family is evicted from housing assisted by the program for a serious or repeated violation of the lease;
  - iv. There is a household member whose pattern of illegal drug use interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents. The members of the household may not engage in drug-related criminal activity, other violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises. The use of medical marijuana is included in this ban;
  - v. Any household member has ever been convicted for manufacturing or production of methamphetamine on the premises of federally assisted housing;

- vi. A family member is fleeing to avoid prosecution, custody, or confinement after conviction for a crime or an attempt to commit a crime that is a felony.
- vii. If a welfare-to-work family fails to fulfill its obligations under the welfare-to-work housing choice voucher program.

4. Final HAP payment to owner

The HAP payment stops when the lease terminates. The owner may keep the payment for the month in which the family moves out. If the owner has begun eviction proceedings and the family continues to occupy the unit, the Housing Authority will continue to make payments until the owner obtains a judgment or the family moves out.

5. Cost Savings Possibilities

Unfortunately, in recent years the management of the Housing Choice Voucher Program has become more difficult for GHA and all other housing authorities managing the program. As Congress and HUD change the way they fund the program, more and more challenges face GHA.

There are no simple solutions to the challenges GHA faces and the actions we must take will vary depending on circumstances that are often beyond our control. Therefore, GHA hereby establishes in its Administrative Plan the following options that will be considered by the Board of Commissioners depending on the particular circumstances of the time. They are not listed in any particular order.

None of these options will be implemented without Board of Commissioner approval and the opportunity for affected participants to address the Board of Commissioners. Any actions taken under this section of the Administrative Plan will sunset if and when the procuring reason for the action is no longer in effect. Rescissions will also require Board of Commissioner approval.

There shall be one basic principle that will guide GHA in implementing any or all of these options – what must GHA do to assist the maximum number of eligible people in a quality Housing Choice Voucher Program while maintaining the fiscal integrity of the program. GHA shall endeavor to protect elderly and disabled families from significant impact (defined as loss of one’s Housing Choice Voucher) but recognizes that what is feasible is dependent on the amount of funding provided to the program.

The options are as follows:

- A. The Housing Choice Voucher Payment Standards may be reviewed in light of the funding situation. If payment standards are reduced, the lower payment standard shall go into effect immediately for new admissions, participants moving from one unit to another, and people staying in place who require a new HAP contract because they are signing a new lease. In extraordinary circumstances, GHA may be forced to ask HUD for a waiver so that even those participants staying in place without a new lease shall have their payment standard decreased immediately instead of the normal second regular reexamination after the lowering of the payment standard.
- B. Since Housing Authorities do not have to wait until the HAP contract anniversary date to review owner rents and reduce them if warranted, GHA will ensure that owner rents do not exceed amounts charged for unassisted units in the same building or complex. The initial rent and all rent increases must comply with any State or local rent control limits. Further, any owner leasing promotions for unassisted tenants (e.g., the initial two months of occupancy are "rent free") must be taken into consideration in determining rent reasonableness.
- C. according to HUD regulation so that no more than 40% of the participants are paying more than 30% of their monthly adjusted income for rent. If circumstances dictate it, GHA may be forced to ask for a waiver of this prohibition in order to sufficiently lower its payment standard. The utility allowance schedule may be reviewed to determine if the utility allowances are too high. If they are too high that means that the participants are being subsidized in an excess manner. The new utility allowance schedule may be placed into effect after a thirty-day notice or at a participant's next reexamination depending on the financial circumstances GHA finds itself in.
- D. An initial PHA will request that a receiving PHA absorb portable families for which GHA is being billed. This may include the receiving PHA retroactively absorbing families for which GHA was already billed and made payments. In these cases, the receiving PHA reimburses GHA for payments made back to the effective date of the absorption. Both the receiving PHA and initial PHAs must agree to this arrangement. This provision provides an exception to Section 10 of Notice PIH 2008-43 on HCV Portability and Corrective Actions. (Section 10 provides that the receiving PHA may not retroactively absorb families for which the receiving PHA was previously billing for any time period that commences before 10 working days from the time the receiving PHA notifies the initial PHA of the absorption.) GHA will attempt to get receiving PHAs to absorb whenever possible.
- E. If financial circumstances dictate, GHA may deny portability moves

to a higher cost area for its Housing Choice Voucher participants and/or shoppers if GHA has insufficient funds to pay the higher subsidy amounts and the receiving housing authority declines to absorb the family. While the Board of Commissioners must establish this policy after an examination of the fiscal affairs of the organization, individual denials of portability shall only occur after GHA has determined that the receiving housing authority will not absorb the family. The denial of absorption shall be documented in that person's file.

- F. This can only occur if the portability action would cause GHA to be unable to avoid terminating the vouchers of current voucher participants during the affected calendar year. If a family is denied its portability request, no subsequent families will be admitted to the program until GHA has determined that sufficient funding exists to approve the move and has notified the family that the family may now exercise its move to the higher cost area.
- G. If financial circumstances dictate, GHA may deny the right of a participant to move within the jurisdiction of GHA to a portion of the jurisdiction that has a higher payment standard than the portion of the jurisdiction the participant currently lives in if GHA has insufficient funds to pay the higher subsidy amounts.
- H. Housing Choice Vouchers issued to families on the waiting list that have not resulted in HAP contracts may be cancelled.
- I. GHA may be forced to not reissue vouchers surrendered by current participants immediately upon their return to GHA. Instead, the vouchers may be held in GHA's inventory in order to avoid dire financial consequences. The amount of time they will be held shall be determined based upon the financial situation of GHA.
- J. The subsidy standards set forth in Section 6.0 may be reexamined. The size of the unit the Housing Choice Voucher is issued for may need to be reduced. For example, the current age differential of 9 years now would apply only when the older child is 18 years or older or you may use the zero-bedroom payment standard for households with only one person.
- K. A program-wide study may be conducted to ensure that families are utilizing the proper size Housing Choice Voucher for their current family size.
- L. If the minimum rent is increased under Section 11.4 (B), it can be made the first of the month following the month families are notified

of the increase (provided there has been at least a 30-day notice) instead of at the next reexamination.

M. Owners participating in the Housing Choice Voucher Program may be asked to voluntarily reduce the rents they are charging participants in order to assist in the financial solvency of the program. This must be a truly voluntary program.

N. The absolutely last step GHA will take to resolve its Housing Choice Voucher financial problems will be to terminate the vouchers of families already receiving assistance. If this becomes necessary, the following sequence shall be used to determine which individual Housing Choice Vouchers are terminated first.

1. Last on is first off.

If it becomes necessary for GHA to terminate Housing Choice Vouchers, the families terminated shall be reinstated onto the program as soon as fiscally and practically feasible. The following readmission sequence shall be utilized.

1. Date and time of application at original admission.

## **17.0 CHARGES AGAINST THE HCVP ADMINISTRATIVE FEE RESERVE**

### **17.1 EXPENDITURE LIMITS**

Occasionally, it is necessary for the Greensboro Housing Authority to spend money from its HCVP Administrative Fee Reserve to meet unseen or extraordinary expenditures or for its other housing related purposes consistent with federal and State law.

The Greensboro Housing Authority Board of Commissioners authorizes the Executive Director to expend without prior Board approval up to \$100,000 or such other amount as established in the GHA Procurement Policy for authorized expenditures.

Any item(s) exceeding the established amount will require prior Board of Commissioner approval before any charge is made against the HCVP Administrative Fee Reserve.

## **18.0 INTELLECTUAL PROPERTY RIGHTS**

No program receipts may be used to indemnify contractors or subcontractors of the Greensboro Housing Authority against costs associated with any judgment of infringement of intellectual property rights.

## **19.0 GREENSBORO HOUSING AUTHORITY OWNED HOUSING**

Definition of PHA-owned units in accordance with HOTMA, a unit is “owned by a PHA” if the unit is in a project that is:

- (a) Owned by the PHA (which includes a PHA having a “controlling interest” in the entity that owns the unit);
- (b) Owned by an entity wholly controlled by the PHA; or
- (c) Owned by a limited liability company (LLC) or limited partnership in which the PHA (or an entity wholly controlled by the PHA) holds a controlling interest in the managing member or general partner.

### **19.1 INDEPENDENT ENTITY**

Units owned by the Greensboro Housing Authority (see definition) and not receiving subsidy under any other program are eligible housing units for Housing Choice voucher holders.

In order to comply with Federal regulation, the Greensboro Housing Authority will do the following:

- A. The Greensboro Housing Authority will make available through the briefing process both orally and in writing the availability of Greensboro Housing Authority owned units (notification will also include other properties owned/managed by the private sector available to Housing Choice voucher holders).
- B. The Greensboro Housing Authority will obtain the services of an independent entity to perform the following Greensboro Housing Authority functions:
  - 1. Determine rent reasonableness for the unit. The independent entity will communicate the rent reasonableness determination to the family and the Greensboro Housing Authority.
  - 2. To assist the family in negotiating the rent.
  - 3. To inspect the unit for compliance with HQS.
- C. The Greensboro Housing Authority will gain HUD approval for the independent agency/agencies utilized to perform the above functions.
- D. The Greensboro Housing Authority will compensate the independent agency/agencies from our ongoing administrative fee income.
- E. The Greensboro Housing Authority, or the independent agency/agencies, will not charge the family any fee or charge for the services provided by the independent

agency.

## **20.0 QUALITY CONTROL OF THE HCVP**

In order to maintain the appropriate quality standards for the HCVP, the Greensboro Housing Authority will annually review files and records to determine if the work documented in the files or records conforms to program requirements. This shall be accomplished by a supervisor or another qualified person other than the one originally responsible for the work or someone subordinate to that person. The number of files and /or records checked shall be at least equal to the number specified in the HCVP Management Assessment Program (SEMAP) for our size housing authority.

Among the areas that shall have quality control reviews are the following:

- A. The proper people were selected from the waiting list and their selection criteria were actually met by the applicants.
- B. The determination of rent reasonableness.
- C. Tenants are paying the appropriate rent and their income and expenses were properly verified both upon admission and re-certification.
- D. HQS inspections were properly made.
- E. HQS deficiencies were properly followed up on and appropriate repairs were made in a timely manner.

If significant errors are found during a quality control review, then appropriate training shall be immediately conducted for the person or persons who made the errors and that person shall correct all of his or her errors.

## **21.0 ENHANCED SUBSIDIES FOR HOUSING VOUCHER CONVERSION ACTIONS**

### **21.1 PRESERVATION PREPAYMENTS**

When the owner prepays the mortgage or voluntarily terminates the mortgage insurance of preservation eligible properties (generally Section 236 and Section 221(d)(3) properties) certain residents are eligible for enhanced voucher assistance.

- A. Owner Prepays the Mortgage or Voluntarily Terminates the Mortgage Insurance (Preservation Prepayments)

Tenant-based assistance is offered to eligible residents of properties covered by the

Emergency Low-Income Housing Preservation Act of 1987 (ELIHPA) and the Low-Income Housing Preservation and Resident Homeownership Act of 1990 (LIHPRHA). (HUD's Office of Housing is responsible for identifying property eligibility under these provisions)

1. Covered Prepayments

To be considered an eligible property, the property must have reached its 20<sup>th</sup> year from final endorsement and meet one of the following criteria:

- a. Section 221(d)(3)-market rate, limited distribution properties receiving Section 8 payments converted from Rent Supplement whose project number series is 35001-36599;
- b. All Section 221(d)(3) below market interest rate properties whose Rent Supplement Contract remains in effect between HUD and the mortgagor;
- c. All Section 236 properties whose project number series are 44001-44799; 44801-44899; 45001-45999; and 58501-58999, unless a Rent Supplement Contract remains in effect between HUD and the mortgagor;
- d. A purchase money mortgage formerly insured under Section 221(d)(3) or 236;
- e. A mortgage held by a state agency as a result of a sale by HUD without insurance, which immediately before the sale would have been eligible low-income housing under LIHPRHA; which mortgage (1) for LIHPRHA properties is, or is within 2 years of being, eligible for prepayment by contract or regulation in effect before February 5, 1988 without HUD's prior approval; or (2) for ELIHPA properties is, or is within 1 year of being, eligible for prepayment under regulation or contract in effect before February 5, 1988; or
- f. All State-assisted properties that are eligible for preservation assistance under LIHPRHA or ELIHPA.

2. Flexible Subsidy Properties

Section 536 of the Preserving Affordable Housing for Senior Citizens and Families into the 21<sup>st</sup> Century Act provides that any property that receives or has received assistance under Section 201 of the Housing and Community Development Amendments of 1978 (the flexible subsidy program, 12 U.S.C. 1715z-1a) which is the subject of a transaction under which the property is preserved as affordable housing (as determined by HUD) shall be considered



eligible low-income housing under Section 229 of LIHPRHA for purposes of eligibility of residents for enhanced tenant-based assistance. (The Office of Housing is responsible for determining on a case-by-case basis if a flexible subsidy property meets the requirements of Section 536 concerning the applicability of enhanced vouchers)

B. Families Eligible for Enhanced Voucher Assistance in Preservation Eligible Properties

The resident family must be residing in the preservation eligible property on the effective date of prepayment or voluntary termination of mortgage insurance (or the effective date of the transaction in the case of covered flexible subsidy properties) and must be income-eligible on that effective date.

1. Income Eligibility

In order to be eligible for enhanced voucher assistance, the resident must be:

- a. a low-income family (including a very low-income or extremely low income family);
- b. a moderate-income elderly or disabled family; or
- c. a moderate-income family residing in a low vacancy area (3 percent or less vacancy rate). (The HUD field office economist is responsible for determining whether the property where the owner is prepaying or voluntarily terminating the mortgage insurance is located in a low vacancy area).

A resident family who does not fall into one of those categories on the effective date of the prepayment or voluntary termination is not eligible for a voucher, regardless of whether the family's situation subsequently changes after the effective date of the prepayment.

A low-income family is a family whose annual income does not exceed 80 percent of the median income for the area as determined by HUD.

A moderate-income family is a family whose annual income is above 80 percent but does not exceed 95 percent of the area median income as determined by HUD.

2. Unassisted and Assisted Families

Both previously unassisted and currently assisted residents may be eligible for enhanced voucher assistance as the result of a preservation prepayment.

A voucher participant who is residing in the property at the time of the

eligibility event shall receive enhanced voucher assistance if the family meets all of the following conditions:

- a. the family must meet the income requirements on the date of the eligibility event;
- b. any rent increase under the voucher program must be in accordance with the lease agreement and program regulations;
- c. the new gross rent must be reasonable; and
- d. the family must decide to stay in the unit instead of moving.

Under the voucher program, an owner may increase the rent as permitted by the terms of the existing lease and local and state law, so long as the new rent is reasonable. The owner is not required by the program regulations to terminate the existing lease and HAP contract for current voucher participants to receive the special enhanced subsidy.

If the above conditions are met, the payment standard utilized by the Greensboro Housing Authority to calculate the housing assistance payment is the new gross rent of the family's unit. The enhanced voucher minimum rent requirement now applies to the family (See Enhanced Voucher Minimum Rent Requirement for Stayers below).

Any family receiving Section 8 project-based assistance on the effective date of the prepayment will continue to receive the project-based assistance until the project-based contract expires or terminates. Such families will receive enhanced voucher assistance at the time of the expiration and non-renewal of the Section 8 project-based contract.

### 3. Eligibility Event and Existing Leases

Note that the eligibility event (e.g., the prepayment of the mortgage or the voluntary termination of a mortgage insurance contract for a preservation eligible property and the approval of the flexible subsidy transaction for flexible subsidy properties) does not in itself necessarily terminate or modify the existing leases between the owner and the current residents of the property. An owner may only legally increase the rent or terminate the lease as provided under the terms of the lease in accordance with state and local law. In addition, an owner may not increase the rent for at least 60 calendar days from the eligibility event in the case of a preservation prepayment or voluntary termination of the mortgage.

If an eligible family chooses to stay at the property, the Greensboro Housing Authority will not enter into a HAP contract that commences prior to the effective date of the rent increase.

In addition, a family that receives an enhanced voucher has the right to remain in the property as long as the units are used for rental housing and are otherwise eligible for housing choice voucher assistance. The owner may not terminate the tenancy of a family that exercises its right to remain except for a serious or repeated lease violation or other good cause. If an owner refuses to honor the family's right to remain, the family may exercise any judicial remedy that is available under state and/or local law.

4. Family Eligibility for Enhanced Voucher Assistance in Cases Where There Would be no Initial Housing Assistance Payment and the Family Wishes to Stay in the Property. If the Greensboro Housing Authority determines that the family is income-eligible for an enhanced voucher but that there is no HAP payment because the family's total tenant payment equals or is greater than the gross rent, the Greensboro Housing Authority will maintain a record of eligibility determination for that family. The Greensboro Housing Authority shall inform the family that should the family's income decrease or the family's rent increase within three years of the eligibility event, the family may contact the Greensboro Housing Authority. Should the Greensboro Housing Authority then determine that the change in income would result in a housing assistance payment, the Greensboro Housing Authority will execute a housing assistance payment contract on behalf of the family at such time (assuming the unit is approved for leasing in accordance with the housing choice voucher program requirements). It is the family's responsibility to contact the Greensboro Housing Authority when there is a decrease in family income or an increase in the family rent.

- C. Voluntary Termination of Mortgage Insurance or Prepayment of Mortgage on Section 236 Property's Where Section 236 Rent Rules Remain Applicable (decoupling actions)

Where an owner voluntarily terminates the mortgage insurance or prepays the Section 236 mortgage in a preservation eligible Section 236 property and the rent setting requirements of the Section 236 program are still applicable to the property, the enhanced voucher rent would be no greater than the Basic Rent established in accordance with HUD Notice H 2000-8. Since families must pay at least 30 percent of their monthly adjusted income under the voucher subsidy formula, only those low-income families required to pay the basic rent will receive any voucher subsidy in such instance, unless the family chooses to move.

Regardless of the rents established under the rent formula for these properties, the rent reasonableness requirements of the housing choice voucher program must be met for the family to receive tenant-based assistance at the property. (The HUD Field Office is responsible for informing the Greensboro Housing Authority in cases where the rent setting requirements of the Section 236 program remain in effect).

- D. Enhanced Voucher Family Right to Remain

The FY 2001 Military Construction and FY 2000 Emergency Supplemental

Appropriations laws amended Section 8(t) of the United States Housing Act. A family that receives an enhanced voucher has the right to remain in the property as long as the units are used for rental housing and are otherwise eligible for housing choice voucher assistance (e.g., the rent is reasonable, unit meets HQS, etc.) The owner may not terminate the tenancy of a family that exercises its right to remain except for a serious or repeated lease violation or other good cause. If an owner refuses to honor the family's right to remain, the family may exercise any judicial remedy that is available under State and/or local law.

E. Characteristics of Enhanced Voucher Assistance

1. Payment Standard Where the Family Chooses to Stay in the Same Property

For a family that stays in the property, the payment standard used to calculate the voucher housing assistance payment is the gross rent (rent to owner, plus the applicable Greensboro Housing Authority utility allowance for any tenant-supplied utilities) of the family's unit (provided the proposed gross rent is reasonable), regardless of whether the gross rent exceeds the Greensboro Housing Authority payment standard.

2. Rent Reasonableness Documentation and Lease Requirements

All regular housing choice voucher program requirements concerning the reasonableness of the rent and the provisions of the HUD prescribed lease addendum apply to enhanced vouchers. The Greensboro Housing Authority will determine whether the proposed rent for the family's unit is reasonable.

The Greensboro Housing Authority makes this determination by comparing the unit to other comparable unassisted units based on the current condition of the unit. If the Greensboro Housing Authority determines the owner's proposed new rent is not reasonable, the owner must either lower the rent, or the family will have to find another unit in order to benefit from the voucher.

The special payment standard for enhanced tenant-based assistance for a family that stays in the unit sometimes results in the Greensboro Housing Authority approving a tenancy for a unit that otherwise would be ineligible or unaffordable to a family with regular tenant-based assistance. If the rent is reasonable in comparison to the rents of comparable unassisted units, there is nothing improper or incorrect in approving the owner's new rent even if the rent would not normally be affordable for a family with a regular housing choice voucher. The Greensboro Housing Authority will document the rent reasonableness of the owner's rent in the family's file by including the rents and addresses of the comparable units used to make the determination.

3. Effect of Family Unit Size Limitation - Initial Issuance

4.

Under Housing conversion action, GHA will do a voucher issuance and

determination of the Family's Over-housed status. GHA will issue the eligible family an enhanced voucher based on the GHA subsidy standards or may approve request for a larger bedroom size to permit additional bedrooms if it may be necessary as a reasonable accommodation. When GHA is informed that an appropriate size unit is available, the GHA will notify the over-housed family of the availability of the unit and the family must move to the appropriate size unit in a reasonable time, the family may request an extension due to hardship where exceptions may be granted to allow additional time.

If there is no appropriate size unit currently available for the family in the project, the Greensboro Housing Authority will execute a voucher HAP contract on behalf of the family for the oversized unit, provided the rent is reasonable and the unit complies with all other voucher program requirements such as the housing quality standards. The enhanced voucher housing subsidy calculation will be based on the gross rent for the oversized unit. The subsidy calculation will continue to be based on the gross rent (including subsequent rent increases) for the oversized unit<sup>1</sup> until an appropriate size unit in the project becomes available for occupancy by the family.

The owner must immediately inform the PHA and the family when an appropriate size unit will become available in the project. When an appropriate size unit becomes available, the enhanced voucher family residing in the oversized unit must move to the appropriate size unit in a reasonable time (as determined by the Greensboro Housing Authority) to continue to receive enhanced voucher assistance. The family and owner will enter into a new lease and the housing authority will execute a new voucher HAP contract with the owner for the appropriate size unit. The enhanced voucher subsidy calculation is based on the gross rent for the appropriate size unit.

If an over-housed enhanced voucher family refuses to move to the appropriate size unit, the Greensboro Housing Authority will recalculate the family's housing assistance payment for the oversized unit based on the normally applicable voucher subsidy formula using the applicable payment standard established by the Greensboro Housing Authority for its voucher program.

The family will be responsible for any amount of the gross rent not covered by the housing assistance payment.

The effective date of the housing assistance payment contract for the oversized unit will not be earlier than the expiration date of the term of the family voucher. The family will be responsible for the full rent of the unit prior to the effective date of the housing assistance payment contract.

The payment standard is the gross rent of the oversized unit.

If the Greensboro Housing Authority determines that the unit of an enhanced

voucher family is no longer decent, safe, and sanitary under the HQS requirements because an increase or decrease in family size causes the unit to be overcrowded or over-housed, the family must move to an appropriate size unit in the property when it is or becomes available. The Greensboro Housing Authority is required to assist the family in locating other standard housing in the Greensboro Housing Authority jurisdiction. The family and the Greensboro Housing Authority will try to find an acceptable unit as soon as possible. If the family rejects, without good cause, the offer of a unit that the Greensboro Housing Authority judges to be acceptable, the Greensboro Housing Authority will terminate the HAP contract.

If the family moves to an appropriate size unit in the property, the enhanced voucher subsidy rules would continue to apply to the family's voucher assistance. In the case of a family move from the property, the regular housing choice voucher program rules apply.

5. Family Move: Normal Payment Standard is Applicable<sup>1</sup> This is assuming the unit remains under the voucher HAP contract and all program requirements (such as rent reasonableness) continue to be met.

The Greensboro Housing Authority's normal payment standard is utilized to determine the family's maximum voucher subsidy when the family moves from the property. This includes cases where the proposed new rent for the family's current unit if it is not reasonable or the unit fails HQS, requiring the family to move in order to continue receiving tenant-based assistance.

6. Enhanced Voucher Minimum Rent Requirement for Stayers

Families assisted with enhanced housing choice voucher assistance have a special statutory minimum rent requirement. The law requires that a family receiving enhanced voucher assistance must pay for rent no less than the rent the family was paying on the date of the eligibility event (the effective date of the prepayment of the mortgage or voluntary termination of the mortgage insurance) regardless of what happens to the family's income.

The enhanced voucher minimum rent only applies if the family remains in the property. The enhanced voucher minimum rent does not apply if the family moves from the property.

The method for calculating the minimum rent changes if the family's income subsequently decreases to a significant extent (15% or more) from the family's gross income on the effective date of the prepayment. Guidance on recalculating the minimum rent in cases when a family's income significantly decreases is discussed in detail in number 6 below.

- a. Previously Unassisted Residents Rent Requirement

Previously unassisted residents must pay at least the dollar amount of the gross rent (enhanced voucher minimum rent) the family was paying on the date of prepayment or voluntary termination. The Greensboro Housing Authority's utility allowance will be used to calculate the gross rent at prepayment if all utilities were not included in the rent the family paid to the owner.

A family who stays in the unit and receives enhanced voucher assistance must pay the enhanced voucher minimum rent. If the enhanced voucher minimum rent exceeds 40 percent of the family's monthly-adjusted income, a family must still pay at least the enhanced voucher minimum rent, and the restriction on the normal initial family contribution is not applicable.

b. Previously assisted Section 8 Tenant-based Families Rent Requirement

Residents assisted with Section 8 tenant-based vouchers at the time of a prepayment or voluntary termination by the owner will pay at least the family share (enhanced voucher minimum rent) that they were paying on eligibility event. The enhanced minimum rent provision only applies if the family chooses to remain in its present unit and receive the "enhanced" subsidy.

A family who stays in the unit and receives enhanced voucher assistance must pay the enhanced voucher minimum rent. If the enhanced voucher minimum rent exceeds 40 percent of the family's monthly-adjusted income, a family must still pay at least the enhanced voucher minimum rent, and the restriction on the normal initial family contribution is not applicable.

7. Significant Decline in Family Income - Effect on Enhance Voucher Minimum Rent

If an enhanced voucher family suffers a significant decline in family income, the minimum family share required of the family shall be reduced below the enhanced minimum rent provision so that the percentage of income for rent does not exceed the greater of 30 percent or the percentage of monthly adjusted income actually paid by the family for rent (the rent to owner, plus tenant-paid utilities) on the effective date of the prepayment. A significant decline is defined as gross family income that is at least 15 percent less than the gross family income on the date of the eligibility event.

If the family suffers a significant decline in family income, the Greensboro Housing Authority will change the enhanced voucher minimum rent from an actual dollar amount to a specific percentage of income.

a. Previously Unassisted Families

For eligible families who were previously unassisted on the eligibility event, the family's new enhanced voucher minimum rent is the greater of:

- i. the percentage of the monthly adjusted income the family paid for gross rent on the effective date of the eligibility event; or
- ii. 30 percent of the family's current adjusted monthly income.

b. Previously assisted Section 8 Tenant-based Families

For families who were previously assisted under a project-based or tenant-based contract on day the eligibility event, the family's new enhanced voucher minimum rent is the greater of:

- i. the percentage of the monthly adjusted income the family paid for gross rent;
- ii. the Total Tenant Payment;
- iii. the family share represented on the effective date of the eligibility event; or
- iv. 30 percent of the family's current adjusted monthly income.

The new enhanced voucher minimum rent for these families is a percentage of income as opposed to a specific dollar amount. Once this change in the enhanced voucher minimum rent becomes effective for a family, the enhanced voucher minimum rent for the family remains that specific percentage of income and will not revert to a specific dollar amount, even if the family income subsequently increases or decreases.

When a family reports a significant decrease in family income, the Greensboro Housing Authority will conduct an interim reexamination and verify the changes in income.

The minimum rent represents the lowest amount the family may pay as their family share for as long as the family remains in the property. A family may pay no less than the enhanced voucher minimum rent. Depending on the circumstances, the family may have to pay more than the enhanced voucher minimum rent at the time of eligibility event.



8. Calculating the HAP for Enhanced Voucher Assistance

Regardless of whether the owner's new gross rent after the eligibility event exceeds or is less than the Greensboro Housing Authority's payment standard, the housing assistance payment for a family that stays in their present unit (or moves from an oversized unit to an appropriate size unit within the property) is the following:

The gross rent for the unit minus the greatest of:

- i. 30 percent of the adjusted family income;
- ii. 10 percent of the family monthly income (gross monthly income);
- iii. the welfare rent in as-paid states;
- iv. the enhanced voucher minimum rent; or
- v. the Greensboro Housing Authority's minimum rent.

9. Movers from the Property

If a resident decides to move from the property with the voucher assistance, the payment standard is not enhanced and the special voucher minimum rent does not apply. This applies both to families who decide to move when the eligibility event takes place and to families who have resided at the property after the eligibility event and want to move with continued assistance. In either circumstance, the housing assistance payment and the family share at the new unit are calculated in accordance with the regular rules of the housing choice voucher program.

F. Administering Enhanced Voucher Assistance

The special conditions of enhanced voucher assistance (enhanced voucher minimum rent and the special payment standard rules) are applicable for as long as the family receives voucher assistance in the property.

If an owner subsequently raises the rent for an enhanced voucher family in accordance with the lease, State and local law, and voucher program regulations (including rent reasonableness), the Greensboro Housing Authority will utilize the new gross rent to calculate the voucher HAP payment for the family.

The Greensboro Housing Authority shall identify an eligible family as an enhanced voucher family even if the gross rent of the family's unit does not currently exceed the normally applicable Greensboro Housing Authority payment standard. Since the enhanced payment standard rule also covers any subsequent rent increases, it is possible that the special payment standard may come into play later in the family's tenancy. An enhanced voucher family is also required by law to pay no less than the

enhanced voucher minimum rent, regardless of whether the gross rent exceeds the normally applicable Greensboro Housing Authority payment standards.

1. Enhanced Voucher Minimum Rent

The enhanced voucher minimum rent requirement remains in effect for all families who receive enhanced voucher assistance for as long as they remain in the property.

2. The payment standard used to calculate the family subsidy will continue to be enhanced to match the gross rent for the unit if the gross rent exceeds the normally applicable payment standard and the Greensboro Housing Authority determines the rent is reasonable for as long as the enhanced voucher family continues to reside in the same property.

If the owner raises the rent for a family assisted with an enhanced voucher in accordance with the lease, State and local law, and voucher program regulations, the Greensboro Housing Authority will increase the enhanced payment standard to equal the new gross rent (rent to owner and the applicable Greensboro Housing Authority utility allowance for any tenant-supplied utilities) for the unit provided the Greensboro Housing Authority determines the rent is reasonable. The additional cost of the subsidy will be covered through the regular renewal process for the Greensboro Housing Authority's voucher program.

If a change in the Greensboro Housing Authority's utility allowance (either an increase or decrease) affects the gross rent for a family assisted with an enhanced voucher, the Greensboro Housing Authority will adjust the enhanced payment standard accordingly. The enhanced payment standard may never exceed the gross rent for the assisted family's unit.

## **21.2 OWNER OPT-OUTS**

If an owner opts-out or elects not to renew an expiring contract for project-based assistance, HUD will make enhanced voucher authority available to the Greensboro Housing Authority for eligible families covered by the expiring contract.

A. Covered Opt-outs

The property must be covered in whole or in part by a contract for project-based assistance, and consist of more than four dwelling units under one of the following programs:

1. The new construction or substantial rehabilitation program under Section 8(b)(2) of the United States Housing Act of 1937 (as in effect before October 1, 1983);
2. The property disposition program under Section 8(b) of the United States Housing

Act of 1937;

3. The loan management assistance program under Section 8(b) of the United States Housing Act of 1937;
4. The rent supplement program under Section 101 of the Housing and Urban Development Act of 1965, provided that at the same time there is also a Section 8 project-based contract at the same property that is expiring or terminating and will not be renewed;
5. Section 8 of the United States Housing Act of 1937, following conversion from assistance under Section 101 of the Housing and Urban Development Act of 1965; or
6. The moderate rehabilitation program under Section 8(e)(2) of the United States Housing Act of 1937 (as in effect before October 1, 1991).

Note that an owner may not choose to opt-out of a rent supplement contract. Instead, the rent supplement assistance ends either at the end of the term of the contract (generally 40 years after the first rent supplement payment was made) or when the mortgage terminates, depending on which event occurs first.

In addition, although families affected by Section 8 moderate rehabilitation opt-outs are eligible for enhanced vouchers that are subject to enhanced vouchers rules, these opt-outs are not considered a housing conversion action because the expiring contract is between the owner and the Greensboro Housing Authority. The Housing Authority is not eligible to receive the special fee for extraordinary administrative costs and the specific funding process instructions do not apply to an owner's decision to not renew an expiring Section 8 moderate rehabilitation contract.

B. Family Eligibility for Enhanced Vouchers as a Result of an Owner Opt-out

in order to be eligible for enhanced voucher assistance, the resident must be:

1. A low-income family (including a very low or extremely low-income family); and
2. Residing in a unit covered by the expiring Section 8 project-based contract on the date of expiration.

In the case of the expiration of a covered Section 8 contract under 515(c) of MAHRA only (mark-to-market restructuring where the Section 8 project-based assistance contract is converted to tenant-based assistance), all families assisted under the expiring contract are considered income-eligible for enhanced voucher assistance.

C. Special Income Eligibility Rules for Opt-out Families in Properties Where a Preservation Prepayment Preceded the Owner Opt-out

If the owner opt-out of the Section 8 project-based contract occurs after the owner has prepaid the mortgage or voluntarily terminated the mortgage insurance of a preservation eligible property, families who do not meet the definition of a low-income family may still be eligible to receive an enhanced voucher. In order to be eligible, the family must:

1. Reside in a unit covered by the expiring contract on the date of expiration;
2. Have also resided in the property on the effective date of the prepayment; and
3. Meet the income requirements for enhanced voucher eligibility for residents affected by a preservation prepayment described below.

To determine family eligibility in this circumstance, the Greensboro Housing Authority will first determine income eligibility of the family based on the normal eligibility rules for opt-outs. For a family that is found not to be low-income, the Greensboro Housing Authority will then decide of whether the family lived in the property on the date of the prepayment. If the family resided in the property on the date of prepayment, the Greensboro Housing Authority will then determine if the family is income-eligible under the preservation prepayment rules.

1. Income Requirements for Enhanced Voucher Eligibility for Residents Affected by a Preservation Prepayment

In order to be eligible for enhanced voucher assistance, the resident must be either:

- i. A low-income family (including a very low or extremely low-income family);
- ii. A moderate-income elderly or disabled family; or
- iii. A moderate-income family residing in a low vacancy area (3 percent or less vacancy rate). (The HUD field office economist is responsible for determining whether the property where the owner is prepaying or voluntarily terminating the mortgage insurance is located in a low vacancy area).

A low-income family is a family whose annual income does not exceed 80 percent of the median income for the area as determined by HUD.

A moderate-income family is a family whose annual income is above 80 percent but does not exceed 95 percent of the area median income as determined by HUD.

If the family meets the preservation income requirement, the Greensboro Housing Authority will issue the family an enhanced voucher by virtue of the preservation prepayment out of the opt-out voucher allocation received from HUD.

A resident family who does not fall into one of those categories on the effective date of the prepayment or voluntary termination is not eligible for an enhanced voucher, regardless of whether the family's situation subsequently changes after the effective date of the prepayment.

D. Family Eligibility for Enhanced Voucher Assistance in Cases Where There Would be no Initial Housing Assistance Payment and the Family Wishes to Stay in the Property

If the Greensboro Housing Authority determines that the family is income-eligible for an enhanced voucher but that there is no HAP payment because the family's total tenant payment equals or is greater than the gross rent, the Greensboro Housing Authority will maintain a record of eligibility determination for that family. The Greensboro Housing Authority will inform the family that should the family's income decrease or the family's rent increase within three years of the eligibility event, the family may contact the Greensboro Housing Authority. Should the Greensboro Housing Authority then determine that the change in income would result in a housing assistance payment, the Greensboro Housing Authority will execute a housing assistance payment contract on behalf of the family at such time (assuming the unit is approved for leasing in accordance with the housing choice voucher program requirements). It is the family's responsibility to contact the Greensboro Housing Authority when there is a decrease in family income or an increase in the family rent.

E. Enhanced Voucher Family Right to Remain

The FY 2001 Military Construction and FY 2000 Emergency Supplemental Appropriations laws amended Section 8(t) of the United States Housing Act. A family that receives an enhanced voucher has the right to remain in the property as long as the units are used for rental housing and are otherwise eligible for housing choice voucher assistance (e.g., the rent is reasonable, unit meet HQS, etc.) The owner may not terminate the tenancy of a family that exercises its right to remain except for a serious or repeated lease violation or other good cause. If an owner refuses to honor the family's right to remain, the family may exercise any judicial remedy that is available under State and/or local law.

F. Characteristics of Enhanced Voucher Assistance

1. Payment Standard Where the Family Chooses to Stay in the Same Property

For a family that stays in the property, the payment standard used to calculate the voucher housing assistance payment is the gross rent (rent to owner, plus the applicable Greensboro Housing Authority utility allowance for any tenant-supplied utilities) of the family's unit (provided the proposed gross rent is reasonable), regardless of whether the gross rent exceeds the Greensboro Housing Authority normal payment standard.

## 2. Rent Reasonableness Documentation and Lease Requirements

All regular housing choice voucher program requirements concerning the reasonableness of the rent and the provisions of the HUD prescribed lease addendum apply to enhanced vouchers. The Greensboro Housing Authority will determine whether the proposed rent for the family's unit is reasonable.

The Greensboro Housing Authority makes this determination by comparing the unit to other comparable unassisted units based on the current condition of the unit. If the Greensboro Housing Authority determines the owner's proposed new rent is not reasonable, the owner must either lower the rent, or the family will have to find another unit in order to benefit from the voucher.

The special payment standard for enhanced tenant-based assistance for a family that stays in the unit sometimes results in the Greensboro Housing Authority approving a tenancy for a unit that otherwise would be ineligible or unaffordable to a family with regular tenant-based assistance. If the rent is reasonable in comparison to the rents of comparable unassisted units, there is nothing improper or incorrect in approving the owner's new rent even if the rent would not normally be affordable for a family with a regular housing choice voucher. The Greensboro Housing Authority will document the rent reasonableness of the owner's rent in the family's file by including the rents and addresses of the comparable units used to make the determination.

## 3. Effect of Family Unit Size Limitation - Initial Issuance

The Greensboro Housing Authority will issue the family an enhanced voucher based on its Subsidy Standards, not on the actual size of the unit the family is currently occupying. However, if the family wishes to stay in the property, but is living in an oversized unit, the enhanced voucher family must move to an appropriate size unit in the property if one is available. To the extent there are more over-housed families than appropriate size units available at any time, the Greensboro Housing Authority will determine based on family circumstances (age, frailty, etc.) which families will be required to move.

If there is no appropriate size unit currently available in the property, a family must make a good faith attempt to find a unit outside the property. In order to determine if the family has made a good faith effort, the Greensboro Housing Authority will require the family to submit a list of potential units by address, the landlords name and telephone number.

If the family has not located an eligible unit at the end of the term of the voucher (including any extension granted by the Greensboro Housing Authority) despite making a good faith effort, the Greensboro Housing Authority will execute a housing assistance payment contract for the family's current unit, provided the unit complies with housing quality standards and the proposed rent is determined to be reasonable.

The effective date of the housing assistance payment contract for the oversized unit will not be earlier than the expiration date of the term of the family voucher. The family will be responsible for the full rent of the unit prior to the effective date of the housing assistance payment contract.

The payment standard is the gross rent of the oversized unit. The Greensboro Housing Authority will advise the family in writing that the enhanced subsidy based on the oversized unit's rent will only be paid for one year. During that year, the family may move to an appropriate size unit in the property if one becomes available and the owner agrees to mutually terminate the lease agreement for the oversized unit. The family would receive the special payment standard for the appropriate size unit if the family moves to the appropriate size unit under this circumstance.

After the initial year of assistance in the oversized unit, the Greensboro Housing Authority will apply the normal payment standard in determining the family's housing assistance payment. If the family wishes to remain in the unit and do so under regular housing choice voucher program rules, the family will have to pay the additional cost for the oversized unit out-of-pocket.

If the Greensboro Housing Authority determines that the unit of an enhanced voucher family is no longer decent, safe, and sanitary under the HQS requirements because of an increase in family size that causes the unit to be overcrowded, the family must move to an appropriate size unit in the property or move to another unit not located at the property to continue to receive housing choice voucher assistance. The Greensboro Housing Authority is required to assist the family in locating other standard housing in the Greensboro Housing Authority jurisdiction. The family and the Greensboro Housing Authority will try to find an acceptable unit as soon as possible. If the family rejects, without good cause, the offer of a unit that the Greensboro Housing Authority judges to be acceptable, the Greensboro Housing Authority will terminate the HAP contract.

If the family moves to an appropriate size unit in the property, the enhanced voucher subsidy rules would continue to apply to the family's voucher assistance. In the case of a family move from the property, the regular housing choice voucher program rules apply.

#### 4. Family Move: Normal Payment Standard is Applicable

The Greensboro Housing Authority's normal payment standard is utilized to determine the family's maximum voucher subsidy when the family moves from the property. This includes cases where the proposed new rent for the family's current unit is not reasonable or the unit fails HQS, requiring the family to move in order to continue receiving tenant-based assistance.

#### 5. Enhanced Voucher Minimum Rent Requirement for Stayers

Families assisted with enhanced housing choice voucher assistance have a special statutory minimum rent requirement. The law requires that a family receiving enhanced voucher assistance must pay for rent no less than the rent the family was paying on the date of the eligibility event (the effective date of the prepayment of the mortgage or voluntary termination of the mortgage insurance).

The enhanced voucher minimum rent only applies if the family remains in the property. The enhanced voucher minimum rent does not apply if the family moves from the property.

A family who stays in the unit and receives enhanced voucher assistance must pay the enhanced voucher minimum rent. If the enhanced voucher minimum rent exceeds 40 percent of the family's monthly-adjusted income, a family must still pay at least the enhanced voucher minimum rent, and the restriction on the initial family contribution is not applicable.

a. Previously Unassisted Residents Rent Requirement

Previously unassisted residents must pay at least the dollar amount of the gross rent (enhanced voucher minimum rent) the family was paying on the date of prepayment or voluntary termination. The Greensboro Housing Authority's utility allowance is used to calculate the gross rent at prepayment if all utilities were not included in the rent the family paid to the owner.

A family who stays in the unit and receives enhanced voucher assistance must pay the enhanced voucher minimum rent. If the enhanced voucher minimum rent exceeds 40 percent of the family's monthly-adjusted income, a family must still pay at least the enhanced voucher minimum rent, and the restriction on the initial family contribution is not applicable.

b. Previously assisted Section 8 Tenant-based Families Rent Requirement

Residents assisted with Section 8 tenant-based vouchers at the time of the prepayment or voluntary termination the family will pay at least the family share (enhanced voucher minimum rent) that they were paying on eligibility event. The enhanced minimum rent provision only applies if the family chooses to remain in its present unit and receive the "enhanced" subsidy.

A family who stays in the unit and receives enhanced voucher assistance must pay the enhanced voucher minimum rent. If the enhanced voucher minimum rent exceeds 40 percent of the family's monthly-adjusted income, a family must still pay at least the enhanced



voucher minimum rent, and the restriction on the initial family contribution is not applicable.

6. Significant Decline in Family Income - Effect on Enhance Voucher Minimum Rent

If an enhanced voucher family suffers a significant decline in family income, the minimum family share required of the family shall be reduced so that the percentage of income for rent does not exceed the greater of 30 percent or the percentage of monthly adjusted income actually paid by the family for rent (the rent to owner, plus tenant-paid utilities) on the effective date of the prepayment. A significant decline is defined as gross family income decline of at least 15 percent from the gross family income on the date of the eligibility event.

If the family suffers a significant decline in family income, the Greensboro Housing Authority will change the enhanced voucher minimum rent from an actual dollar amount to a specific percentage of income.

a. Previously Unassisted Families

For families who were previously unassisted on the eligibility event, the family's new enhanced voucher minimum rent is the greater of:

- i. The percentage of the monthly adjusted income the family paid for gross rent on the effective date of the eligibility event; or
- ii. 30 percent of the family's current adjusted monthly income.

b. Previously assisted Section 8 Tenant-based Families

For families who were previously assisted under the Section 8 tenant-based voucher program on the eligibility event, the family's new enhanced voucher minimum rent is the greater of:

- i. The percentage of the monthly adjusted income the family paid for gross rent;
- ii. The Total Tenant Payment;
- iii. The family share represented on the effective date of the eligibility event; or
- iv. 30 percent of the family's current adjusted monthly income.

The new enhanced voucher minimum rent for these families is a percentage of income as opposed to a specific dollar amount. Once

this change in the enhanced voucher minimum rent becomes effective for a family, the enhanced voucher minimum rent for the family normally remains that specific percentage of income and will not revert to a specific dollar amount, even if the family income subsequently increases or decreases unless it increases or decreases by a significant amount.

When a family reports a significant decrease in family income, the Greensboro Housing Authority will conduct an interim reexamination and verify the changes in income.

The minimum rent represents the lowest amount the family may pay as their family share for as long as the family remains in the property. A family may pay no less than the enhanced voucher minimum rent. Depending on the circumstances, the family may have to pay more than the enhanced voucher minimum rent at the time of eligibility event.

If there is a significant decline in a family's income, their rent is recalculated as the percentage of adjusted monthly income calculated at the time of the eligibility event or the family's TTP, whichever is higher. Conversely, if there is a significant increase in income, the participant's rent is the lower of the percentage of adjusted monthly income calculated at the time of the eligibility event or the original Enhanced Voucher minimum rent. Notice PIH 2019-12 sets forth examples.

## 7. Calculating HAP for Enhanced Voucher Assistance

Regardless of whether the owner's new gross rent after the eligibility event exceeds or is less than the Greensboro Housing Authority's payment standard, the housing assistance payment for a family that stays in their present unit (or moves from an oversized unit to an appropriate size unit within the property) is the following:

The gross rent for the unit minus the greatest of:

- a. 30 percent of the adjusted family income;
- b. 10 percent of the family monthly income (gross monthly income);
- c. The welfare rent in as-paid states;
- d. The enhanced voucher minimum rent; or
- e. The Greensboro Housing Authority's minimum rent.

8. Movers from the Property

If a resident decides to move from the property with voucher assistance, the payment standard is not enhanced and the voucher minimum rent does not apply. This pertains to families who decide to move when the eligibility event takes place, and to families who have resided at the property after the eligibility event and want to move with continued assistance. In either circumstance, the housing assistance payment and the family share at the new unit are calculated in accordance with the regular rules of the housing choice voucher program.

G. Administering Enhanced Voucher Assistance

The special conditions of enhanced voucher assistance (enhanced voucher minimum rent and the special payment standard rules) are applicable for as long as the family receives voucher assistance in the property.

If an owner subsequently raises the rent for an enhanced voucher family in accordance with the lease, State and local law, and voucher program regulations (including rent reasonableness), the Greensboro Housing Authority will utilize the new gross rent to calculate the voucher HAP payment for the family.

The Greensboro Housing Authority will identify an eligible family as an enhanced voucher family even if the gross rent of the family's unit does not currently exceed the normally applicable Greensboro Housing Authority payment standard. Since the enhanced payment standard rule also covers any subsequent rent increases, it is possible that the special payment standard may come into play later in the family's tenancy. An enhanced voucher family is also required by law to pay no less than the enhanced voucher minimum rent, regardless of whether the gross rent exceeds the normally applicable Greensboro Housing Authority payment standards.

1. Enhanced Voucher Minimum Rent

The enhanced voucher minimum rent requirement remains in effect for all families who receive enhanced voucher assistance and remain at the property.

2. The payment standard used to calculate the family subsidy will continue to be enhanced to match the gross rent for the unit if the gross rent exceeds the normally applicable payment standard and the Greensboro Housing Authority determines the rent is reasonable for as long as the enhanced voucher family continues to reside in the same property.

If the owner raises the rent for a family assisted with an enhanced voucher in accordance with the lease, State and local law, and voucher program regulations, the Greensboro Housing Authority will increase the enhanced payment standard to equal the new gross rent (rent to owner and the applicable Greensboro Housing Authority utility allowance for any tenant- supplied

utilities) for the unit provided the Greensboro Housing Authority determines the rent is reasonable. The additional cost of the subsidy will be covered through the regular renewal process for the Greensboro Housing Authority's voucher program.

If a change in the Greensboro Housing Authority's utility allowance (either an increase or decrease) affects the gross rent for a family assisted with an enhanced voucher, the Greensboro Housing Authority will adjust the enhanced payment standard accordingly. The enhanced payment standard may never exceed the gross rent for the assisted family's unit.

### **21.3 HUD ENFORCEMENT ACTIONS**

HUD enforcement actions can take the form of either terminating a Section 8 project-based HAP contract or not offering the owner the option to renew an expiring Section 8 project-based HAP contract due to an owner's failure to comply with the terms of the HAP contract. It includes suspensions and debarments.

Additionally, HUD enforcement actions may also result from material adverse financial or managerial actions or omissions that lead to either an owner default under a FHA-insured mortgage (monetary or technical) or a documented material violation of one or more of the obligations under the property's Regulatory Agreement.

Eligible families are usually assisted with regular vouchers that HUD issues to the Greensboro Housing Authority in the above circumstances because families must move to receive housing choice voucher assistance.

The Greensboro Housing Authority will not approve an assisted tenancy at a property if HUD has informed the Greensboro Housing Authority that the owner is debarred, suspended, or subject to a limited denial of participation.

Furthermore, the Greensboro Housing Authority may disapprove owner participation in the housing choice voucher program for a number of other grounds described in the housing choice voucher program regulations and previously set forth in this Administrative Plan. HUD encourages the Greensboro Housing Authority to disapprove a tenancy for any of these grounds in a case where vouchers are provided because HUD is taking an enforcement action against an owner.

In a few situations, families assisted under a Section 8 project-based HAP contract that is being terminated may be able to remain at the property. For instance, if the property is in good physical condition and the owner decides to turn the property over to new ownership, it may be possible for the eligible families assisted under the terminating contract to receive housing choice voucher assistance at the property. In such a case, the project-based families would qualify for enhanced vouchers. (HUD will make the determination whether enhanced or regular voucher assistance is appropriate.)

### **21.4 HUD PROPERTY DISPOSITION**

When HUD is selling the property at a foreclosure sale, or is the mortgagee-in-possession or owner of the multifamily property due to an owner default of an FHA-insured mortgage and closing down the property or selling property to a new owner, it will supply regular housing choice vouchers to assist eligible low-income families.

## **22.1 REPAYMENT AGREEMENTS**

When a participant owes GHA back charges and is unable to pay the balance by the due date, the resident may request that GHA allow them to enter into a Repayment Agreement. The Greensboro Housing Authority has the sole discretion of whether to accept such an agreement. All Repayment Agreements must assure that the full payment is made within a period not to exceed 24 months and shall not exceed \$2,400.00. If feasible, the total amount paid will not exceed 40% of monthly adjusted income. All Repayment Agreements must be in writing and signed by both parties. They must include the following elements:

- A. Reference to the paragraphs in the Section 8 information packet whereby the participant is in non-compliance and may be subject to termination of assistance.
- B. The monthly retroactive repayment amount is in addition to the family's regular rent contribution and is payable to the Greensboro Housing Authority.
- C. Late and missed payments constitute default of the repayment agreement and may result in termination of assistance.
- D. Families will not be required to repay the GHA in cases where the housing authority has miscalculated income resulting in the family being undercharged if the difference in the determination of a family's adjusted income is \$30 or less per month (de minimis). De minimis protections apply to all calculations of income, not just during interim reexaminations. PHAs must take corrective action to credit or repay a family if the family has been overcharged for their family share as a result of an error in determining income, even if the amount is de minimis.

## **23.0 FAMILY SELF SUFFICIENCY PROGRAM**

### **23.1 PURPOSE**

The Greensboro Housing Authority's (GHA) Family Self-Sufficiency (FSS) program is designed to promote economic self-sufficiency among families that participate in the program. GHA works with welfare agencies, schools, businesses, and other local partners

to develop a comprehensive program that gives participating FSS family members the skills and experience to enable them to obtain employment that pays a living wage.

### **23.2 FAMILY PARTICIPATION REQUIREMENTS**

FSS is open to voucher program participants who are in good standing and have a genuine desire to become self-sufficient. Participation in the program is voluntary and families can apply at any time while receiving housing assistance.

### **23.3 PROGRAM REQUIREMENTS**

GHA and the head of the FSS family will execute an FSS contract of participation (COP) that specifies the rights and responsibilities of both parties. The head of the FSS family and those family members who decide to participate in the program, work with a Case Manager to execute an Individual Training and Services Plan. The Case Manager will tailor services to the family's needs, and the family must fulfill all requirements to successfully obtain benefits. The contract requires that all family members comply with the lease and become independent of welfare assistance. The head or the FSS family must seek and maintain suitable employment. Possible sanctions for non-compliance with the FSS contract are termination from the program, forfeiture of the FSS escrow account, and withholding or termination of supportive services. The family may request an extension to the FSS contract, not to exceed two years, if it is mutually agreed that the family will achieve the established goals during this period.

### **23.4 FSS ESCROW ACCOUNT**

An interest-bearing FSS escrow account is established by GHA for each participating family. Participants will be provided an account statement at least annually. This escrow credit is based on increases in the family's earned income which is credited to this account by GHA after execution of the FSS contract. The escrow account is available to the family during the term of the contract to enable the family to complete an agreed upon interim goal such as education.

If the family completes the contract with no member receiving welfare cash assistance and the balance of the FSS escrow account will be paid to the head of the FSS family. If the contract of participation is terminated the escrow will be forfeited unless otherwise stated.

The depository account may be part of the GHA overall accounts or a separate account. Therefore, GHA has the option to:

- (1) Deposit the FSS escrow account funds into a separate bank account which will be used to account solely for the FSS escrow; or
- (2) Deposit the FSS escrow account funds into a bank account that is used for other GHA activity. GHA must ensure that FSS escrow funds are used only for the permitted uses of escrow and HUD approved. This account may be part of the GHA's overall accounts, as long as it is in compliance with § 984.305(a)(2).

- Treatment of forfeited FSS escrow account funds. FSS escrow account funds forfeited by the FSS family must be used by the PHA or owner for the benefit of the FSS participants.
  - (i) Specifically, such funds may be used for the following eligible activities:
    - (A) Support for FSS participants in good standing, including, but not limited to transportation, childcare, training, testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the CoP.
    - (B) Training for FSS Program Coordinator(s); or
    - (C) Other eligible activities as determined by the Secretary.
  - (ii) Such funds may not be used for salary and fringe benefits of FSS Program Coordinators; general administrative costs of the FSS program, for housing assistance payments (HAP) expenses or public housing operating funds; or any other activity determined ineligible by the Secretary.

## **23.5 GHA’S FSS FAMILY TRANSFER TO GHA’S HCV FSS PROGRAM**

FSS participants transferring from Public Housing to the Housing Choice Voucher Program must contact the HCVP case manager within 30 days from date of admission to the HCV program to prevent forfeiture.

## **24.0 HOMEOWNERSHIP OPTION**

### **24.1 PURPOSE**

The Greensboro Housing Authority’s homeownership option is designed to promote and support homeownership by a “first-time” homeowner -- a family that meets the definition in this Plan. It allows one or more members of the family to purchase a home. Section 8 payments supplement the family’s own income to facilitate the transition from rental to homeownership. The initial availability of these assistance payments helps the family pay the costs of homeownership, and may provide additional assurance for a lender, so that the family can finance purchase of the home.

The HCVP homeownership assistance for a cooperative homeowner, is specifically authorized for both families that are first time cooperative homeowners and families that owned its cooperative unit prior to receiving HCV assistance.

### **24.2 FAMILY PARTICIPATION REQUIREMENTS**

- A. In order to assure a successful transition from rental to homeownership, this program shall be open only to those who have been assisted by the HCVP rental assistance program for at least twelve months. During this period (the previous twelve months), all program requirements will have been complied with.
- B. The family is qualified to participate as set forth in Section 24.3 of this policy.
- C. The unit to be purchased is eligible as set forth in Section 24.4 of this policy.

- D. The family has satisfactorily completed the required pre-assistance homeownership counseling.
- E. If located in a special flood hazard area, the purchaser has obtained flood insurance on the home and agrees to maintain this insurance.

### **24.3 FAMILY ELIGIBILITY REQUIREMENTS**

- A. The family has been admitted to the HCVP and desires to participate in the homeownership program.
- B. At the commencement of homeownership assistance, the family must be one of the following:
  - 1. A first-time homeowner;
  - 2. A cooperative member; or
  - 3. A family of which a family member is a person with disabilities, and the use of the homeownership option is needed as a reasonable accommodation so that the program is readily accessible to and usable by such person.
- C. At commencement of homeownership assistance for the family, the family must demonstrate that its total annual income (gross income), as determined by the Greensboro Housing Authority, of all the adult family members who will own the home at commencement of homeownership assistance is not less than the \$15,000 per year, except in the case of an elderly or disabled family where this minimum income will be equal to the Federal Supplement Security Income (SSI) benefit for an individual living alone, multiplied by twelve.

Except in the case of an elderly family or a disabled family, the Greensboro Housing Authority shall not count any welfare assistance received by the family in determining annual income under this section.

The disregard of welfare assistance income under the preceding paragraph only affects the determination of minimum annual income used to determine if a family initially qualifies for commencement of homeownership assistance in accordance with this section, but does not affect:

- 1. The determination of income-eligibility for admission to the Housing Choice Voucher Program;
- 2. Calculation of the amount of the family's total tenant payment (gross family contribution); or
- 3. Calculation of the amount of homeownership assistance payments on behalf



of the family.

In the case of an elderly family or a disabled family, welfare assistance shall be counted in determining annual income.

- D. The family must demonstrate that one or more adult members of the family who will own the home at commencement of homeownership assistance:
1. Is currently employed on a full-time basis (the term “full-time employment” means not less than an average of 30 hours per week); and
  2. Has been continuously so employed during the year before commencement of homeownership assistance for the family.

This requirement shall be considered fulfilled if:

1. The family member is self-employed and earning a net income (income after business expenses have been deducted) that equals \$15,000 per year; or
2. Any employment interruptions either were not the fault of the family member or were for less than 30 calendar days and caused by an effort to improve the family’s situation.

The employment requirement does not apply to an elderly family or a disabled family. Furthermore, if a family other than an elderly family or a disabled family, includes a person with disabilities, an exemption from the employment requirement shall be granted if the Greensboro Housing Authority determines that an exemption is needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

- E. The Greensboro Housing Authority shall not commence homeownership assistance for a family if any family member has previously received assistance under the homeownership option, and has defaulted on a mortgage securing debt incurred to purchase the home.
- F. Except for cooperative members who have acquired cooperative membership shares prior to commencement of homeownership assistance, no family member has a present ownership interest in a residence at the commencement of homeownership assistance for the purchase of any home.
- G. Except for cooperative members who have acquired cooperative membership shares prior to the commencement of homeownership assistance, the family has entered a contract of sale.

#### **24.4 ELIGIBLE UNITS**

- A. Any unit that is eligible under the HCVP rental assistance program is eligible for this program except the restrictions against purchasing a unit owned by the housing authority or precluding a unit occupied by its owner or by a person with any interest in the dwelling unit are not applicable. The types of units eligible are:
  - 1. Single family dwellings;
  - 2. Condominiums;
  - 3. Cooperatives; and
  - 4. Manufactured Housing with a permanent foundation
  - 5. PHA-owned units
  - 6. Units not yet under construction (see 24.4(G))
- B. The unit must be either existing or under construction at the time the Greensboro Housing Authority determines that the family is eligible for homeownership assistance.
- C. The unit must be either a one-unit property or a single dwelling unit in a cooperative or condominium.
- D. The unit must satisfy the housing quality standards (HQS) and have been inspected

by an independent inspector designated and paid for by the family.

- E. The seller cannot be someone who has been debarred, suspended, or is subject to a limited denial of participation by HUD.
- F. If the unit is owned by the Greensboro Housing Authority or by an entity substantially controlled by the Housing Authority, the following additional conditions must be met:
  - 1. The purchasing family must verify in writing that it is purchasing the units without any housing authority steering or pressure; and
  - 2. An independent agency, approved by HUD must perform the following functions for this type of sale:
    - a. Inspect the units for HQS compliance;
    - b. Review the independent inspection report;
    - c. Review the sales contract; and
    - d. Determine the reasonableness of the sale price and any housing authority provided financing.
- G. The unit may not yet be under construction. If a unit is not under construction when the contract for sale is entered into then the following must be completed before assistance can begin:
  - 1. HUD must approve the environmental review;
  - 2. The construction must be complete; and
  - 3. The unit must pass an HQS inspection.

#### **24.5 *SEARCHING FOR A NEW HOME***

Because the financial health of the Greensboro Housing Authority's HCVP depends upon having units either under lease or being purchased, it is necessary for the Greensboro Housing Authority to limit the amount of time a family can take between the time a Housing Choice voucher is issued to the family and the time a home is identified that the family wishes to purchase. Normally, families will have up to sixty (60) calendar days to locate an appropriate property and notify the housing authority. If extraordinary difficulties are encountered, the family can request up to two (2) thirty (30) day extensions that may

be granted at the sole discretion of the Greensboro Housing Authority. If an extension is requested and granted, the family will orally report to the housing authority every two weeks to update the Greensboro Housing Authority on the progress of its search.

Once a suitable property has been identified and an agreement to purchase contract entered into, the Greensboro Housing Authority will determine a maximum time in which the closing must occur and the family to take occupancy of the property. This time frame will vary depending on market conditions.

If the family is unable to locate a suitable home to purchase, it can request that the Housing Choice voucher be converted into a rental assistance housing choice voucher. This request must be made before the housing choice voucher expires. Approval of the request will be at the sole discretion of the Greensboro Housing Authority with the decision being based on the effort exerted by the family and the condition of the marketplace.

Additional time will be granted to a disabled family as a reasonable accommodation if justified by the family's actions and/or marketplace conditions.

#### **24.6 HOMEOWNERSHIP COUNSELING**

Before the commencement of homeownership assistance for a family, the family must attend and satisfactorily complete a pre-assistance homeownership and housing counseling program required by the Greensboro Housing Authority (pre-assistance counseling). If possible, the counseling will be conducted by a HUD-approved counseling agency. If this is not available, the housing authority shall make other arrangements for the pre-assistance counseling.

Among the topics to be covered in the PHA-required pre-assistance counseling program are:

- A. Home maintenance (including care of the grounds);
- B. Budgeting and money management;
- C. Credit counseling;
- D. How to negotiate the purchase price of a home;
- E. How to obtain homeownership financing and loan pre-approvals, including a description of types of financing that may be available, and the pros and cons of different types of financing;
- F. How to find a home, including information about homeownership opportunities, schools, and transportation in the PHA jurisdiction;
- G. Advantages of purchasing a home in an area that does not have a high concentration

of low-income families and how to locate homes in such areas;

- H. Information on fair housing, including fair housing lending and local fair housing enforcement agencies; and
- I. Information about the Real Estate Settlement Procedures Act (RESPA), state and Federal truth-in-lending laws, and how to identify and avoid loans with oppressive terms and conditions.

The Greensboro Housing Authority will also offer additional counseling after commencement of homeownership assistance (ongoing counseling). This counseling will be voluntary for all homeownership assistance recipients except those requesting their second, fourteenth and fifteenth years of assistance. The reason for this mandatory counseling is to make sure the families are either off to a good start or preparing for the termination of their assistance.

#### **24.7 HOME INSPECTIONS**

The Greensboro Housing Authority will not commence homeownership assistance for a family until it has inspected the unit and has determined that the unit passes HQS.

The unit must also be inspected by an independent professional inspector selected by and paid by the family. The independent inspection must cover major building systems and components, including foundation and structure, housing interior and exterior, and the roofing, plumbing, electrical, and heating systems. The independent inspector must be qualified to report on property conditions, including major building systems and components. The Greensboro Housing Authority may not require the family to use an independent inspector selected by the housing authority. The independent inspector may not be a housing authority employee or contractor, or other person under control of the housing authority. The independent inspector must be licensed by the State of North Carolina. It shall be the responsibility of the inspector to verify that he or she is licensed by the State of North Carolina.

The independent inspector must provide a copy of the inspection report both to the family and to the Greensboro Housing Authority. The housing authority will not commence homeownership assistance for the family until it has reviewed the inspection report of the independent inspector. Even if the unit otherwise complies with the HQS (and may qualify for assistance under the Greensboro Housing Authority's tenant-based rental housing choice voucher program), the housing authority shall have discretion to disapprove the unit for assistance under the homeownership option because of information in the inspection report.

#### **24.8 CONTRACT OF SALE**

Before commencement of homeownership assistance, a member or members of the family must enter into a contract of sale with the seller of the unit to be acquired by the family. The family must give the Greensboro Housing Authority a copy of the contract of sale.

The contract of sale must:

- A. Specify the price and other terms of sale by the seller to the purchaser.
- B. Provide that the purchaser will arrange for a pre-purchase inspection of the dwelling unit by an independent inspector selected by the purchaser.
- C. Provide that the purchaser is not obligated to purchase the unit unless the inspection is satisfactory to the purchaser.
- D. Provide that the purchaser is not obligated to pay for any necessary repairs.
- E. Contain a certification from the seller that the seller has not been debarred, suspended, or subject to a limited denial of participation.

If the unit to be acquired is not yet under construction, the contract of sale must also include:

- A. The purchaser is not obligated to purchase the unit unless an environmental review has been performed and the site has received environmental approval prior to commencement of construction in accordance with 24 CFR 982.628.
- B. The construction will not commence until the environmental review has been completed and the seller has received written notice from Greensboro Housing Authority that environmental approval has been obtained. The Seller must realize that conducting the environmental review may not necessarily result in environmental approval, and environmental approval may be conditioned on the contracting parties' agreement to modifications to the unit design or to mitigation actions.
- C. Commencement of construction in violation of the paragraph above voids the purchase contract and renders the HCVP homeownership assistance unavailable for the purchase of this unit.

#### **24.9 FINANCING THE PURCHASE OF THE HOME**

- A. A purchasing family must invest at least three percent of the purchase price of the home they are buying in the property. This can take the form of either a down payment, closing costs, or a combination of the two. Of this sum, at least one percent of the purchase price must come from the family's personal resources.
- B. The family must qualify for the mortgage loan under a lender's normal lending criteria taking into account the fact that this is by definition a low-income family.
- C. If the home is purchased using FHA mortgage insurance, it is subject to FHA mortgage insurance requirements.

- D. If the loan is financed either by the seller or a non-traditional mortgage lending institution or individual, the loan shall be subject to the review of the Greensboro Housing Authority. The housing authority may verify that there are no unusual or onerous requirements in the loan documents and that the mortgage is affordable to the purchasing family. Also, the lender must require that an appraisal of the property is conducted and the appraiser must determine that the property is worth at least as much as the purchaser is paying.
- E. Unless the purchaser can convince the Greensboro Housing Authority of unusual circumstances, no balloon payment mortgages or variable rate mortgages shall be allowed in the program.
- F. All mortgage loans must close within the period of time established by the Greensboro Housing Authority at the time the purchaser and seller enter into their sale contract.

#### ***24.10 REQUIREMENT FOR CONTINUED ASSISTANCE***

Homeownership assistance will only be paid while the family is residing in the home. If the family moves out of the home, the Greensboro Housing Authority will not continue homeownership assistance after the month when the family moves out. The family or lender is not required to refund to the PHA the homeownership assistance for the month when the family moves out.

The family must comply with the following obligations:

- A. The family must attend and complete ongoing homeownership and housing counseling before the end of the first, thirteenth and fourteenth years of assistance in order for assistance to continue.
- B. The family must comply with the terms of any mortgage securing debt incurred to purchase the home (or any refinancing of such debt).
- C. As long as the family is receiving homeownership assistance, use and occupancy of the home is subject to the following requirements:
  - 1. The family must use the assisted unit for residence by the family. The unit must be the family's only residence.
  - 2. The composition of the assisted family residing in the unit must be approved by the Greensboro Housing Authority. The family must promptly inform the housing authority of the birth, adoption or court- awarded custody of a child. The family must request housing authority approval to add any other family member as an occupant of the unit. No other person (i.e., nobody but members of the assisted family) may reside in the unit (except for a foster

child or live-in aide).

3. The family must promptly notify the Greensboro Housing Authority if any family member no longer resides in the unit.
  4. The family must not sublease or let the unit.
  5. The family must not assign the mortgage or transfer the unit.
  6. The family must supply any information or certification requested by the housing authority to verify that the family is living in the unit, or relating to family absence from the unit, including any housing authority requested information or certification on the purposes of family absences. The family must cooperate with the housing authority for these purposes. The family must promptly notify the housing authority of their absence from the unit.
- D. The family may grant a mortgage on the home for debt incurred to finance purchase of the home or any refinancing of such debt.
- E. Upon death of a family member who holds, in whole or in part, title to the home or ownership of cooperative membership shares for the home, homeownership assistance may continue pending settlement of the decedent's estate, notwithstanding transfer of title by operation of law to the decedent's executor or legal representative, so long as the home is solely occupied by remaining family members in accordance with Paragraph C above. In the case of a divorce or family separation, the assistance shall follow what a court decree.
- F. The family shall supply the Greensboro Housing Authority with any required information requested by the housing authority. In particular this shall include information relating to the following:
1. Citizenship or related immigration matters;
  2. Family income and composition;
  3. Social security numbers;
  4. Any mortgage or other debt placed on the property;
  5. Any sale or other transfer of any interest in the home; and
  6. The family's homeownership expenses.
- G. The family must notify the housing authority before the family moves out of the home.



- H. The family must notify the Greensboro Housing Authority if the family defaults on a mortgage securing any debt incurred to purchase the home.
- I. During the time the family receives homeownership assistance under this program, no family member may have any ownership interest in any other tenanted property.
- J. Before commencement of homeownership assistance, the family must execute a statement of family obligations in the form prescribed by HUD. In the statement, the family agrees to comply with all family obligations under the homeownership option.
- K. The family must secure the written permission of the Greensboro Housing Authority before it refinances any debt secured by the home or places any additional secured debt on the property.
- L. The family must assure the Greensboro Housing Authority that all real estate taxes were paid on a timely basis. If they are not paid, assistance shall be terminated.

#### ***24.11 MAXIMUM TERM OF HOMEOWNERSHIP ASSISTANCE***

- A. Except in the case of a family that qualifies as an elderly or disabled family, family members shall not receive homeownership assistance for more than fifteen years if the initial mortgage incurred to finance purchase of the home has a term of 20 years or longer; or ten years, in all other cases.
- B. The maximum term described in the preceding paragraph applies to any member of the family who has an ownership interest in the unit during the time the homeownership payments are made or is the spouse of any member of the household who has an ownership interest during the time the homeownership payments are made.
- C. As noted in Paragraph A of this Section, the maximum homeownership assistance term does not apply to elderly and disabled families. In the case of an elderly family, the exception only applies if the family qualifies as an elderly family at the start of homeownership assistance. In the case of a disabled family, the exception applies if at any time during receipt of homeownership assistance the family qualifies as a disabled family. If, during the course of homeownership assistance, the family ceases to qualify as a disabled or elderly family, the maximum term becomes applicable from the date homeownership assistance commenced. However, such a family must be provided at least 6 months of homeownership assistance after the maximum term becomes applicable (provided the family is otherwise eligible to receive homeownership assistance in accordance with this program).
- D. If the family has received such assistance for different homes, or from different housing authorities, the total of such assistance terms is subject to the maximum term described in Paragraph A of this section.

## **24.12 AMOUNT AND DISTRIBUTION OF HOMEOWNERSHIP ASSISTANCE**

- A. While the family is residing in the home, the Greensboro Housing Authority shall pay a monthly homeownership assistance payment on behalf of the family that is equal to the lower of:
1. The payment standard minus the total tenant payment; or
  2. The family's monthly homeownership expenses minus the total tenant payment.
- B. The payment standard for a family is the lower of:
1. The payment standard for the family unit size; or
  2. The payment standard for the size of the home.

If the home is located in an exception payment standard area, the Greensboro Housing Authority will use the appropriate payment standard for the exception payment standard area.

The payment standard for a family is the greater of:

1. The payment standard (as determined in accordance with Paragraph A of this section) at the commencement of homeownership assistance for occupancy of the home; or
2. The payment standard (as determined in accordance with Paragraph A of this section) at the most recent regular reexamination of family income and composition since the commencement of homeownership assistance for occupancy of the home.

The Greensboro Housing Authority will use the same payment standard schedule, payment standard amounts, and subsidy standards for the homeownership option as for the rental housing choice voucher program.

- C. A family's homeownership expenses shall include the following items:
1. Principal and interest on initial mortgage debt, any refinancing of such debt, and any mortgage insurance premium incurred to finance purchase of the home;
  2. Real estate taxes and public assessments on the home;
  3. Home insurance;

4. Maintenance expenses of \$75 per month;
5. An allowance of \$25 a month for costs of major repairs and replacements;
6. The Greensboro Housing Authority's utility allowance for the home; and

Principal and interest on mortgage debt incurred to finance costs for major repairs, replacements or improvements for the home. If a member of the family is a person with disabilities, such debt may include debt incurred by the family to finance costs needed to make the home accessible for such person, if the housing authority determines that allowance of such costs as homeownership expenses is needed as a reasonable accommodation so that the homeownership option is readily accessible to and usable by such person.

7. Land lease payments. The family must have the right to occupy the site for a period of at least 40 years.

D. Homeownership expenses for a cooperative member may only include amounts to cover:

1. The cooperative charge under the cooperative occupancy agreement including payment for real estate taxes and public assessments on the home;
2. Principal and interest on initial debt incurred to finance purchase of cooperative membership shares and any refinancing of such debt;
3. Home insurance;
4. The PHA allowance for maintenance expenses;
5. The PHA allowance for costs of major repairs and replacements;
6. The PHA utility allowance for the home; and
7. Principal and interest on debt incurred to finance major repairs, replacements or improvements for the home. If a member of the family is a person with disabilities, such debt may include debt incurred by the family to finance costs needed to make the home accessible for such person, if the housing authority determines that allowance of such costs as homeownership expenses is needed as a reasonable accommodation so that the homeownership option is readily accessible to and usable by such person.

E. If the home is a cooperative or condominium unit, homeownership expenses may

also include cooperative, or condominium operating charges or maintenance fees assessed by the condominium or cooperative homeowner association.

- F. The Greensboro Housing Authority will pay homeownership assistance payments directly to the lender on behalf of the family unless the lender does not want the payment to be made directly to them. If there is any excess assistance, it will be paid to the family.
- G. Homeownership assistance for a family terminates automatically 180 calendar days after the last housing assistance payment on behalf of the family. However, Greensboro Housing Authority retains the discretion to grant relief from this requirement in those cases where automatic termination would result in extreme hardship for the family.

#### **24.13 HOMEOWNERSHIP PORTABILITY**

- A. A family may qualify to move outside the initial Greensboro Housing Authority's jurisdiction with continued homeownership assistance under the housing choice voucher program. Families determined eligible for homeownership assistance by the Greensboro Housing Authority may purchase a unit outside our jurisdiction, if:
  - 1. They meet our normal requirements for portability under the rental program;
  - 2. The receiving housing authority is administering a housing choice voucher homeownership program and the family meets the receiving housing authority's eligibility requirements; and
  - 3. The receiving housing authority is accepting new homeownership families.
- B. Conversely, if the Greensboro Housing Authority has slots open in our homeownership program we will accept homeowners exercising portability from another program and absorb such families if possible.
- C. In general, the portability procedures described previously in this Administrative Plan apply to the homeownership option. The administrative responsibilities of the initial and receiving housing authorities are not altered except that some administrative functions (e.g., issuance of a housing choice voucher or execution of a tenancy addendum) do not apply to the homeownership option.
- D. The family must attend the briefing and counseling sessions required by the receiving housing authority. The receiving housing authority will determine whether the financing for, and the physical condition of the unit, are acceptable.

The receiving housing authority must promptly notify the initial housing authority if the family has purchased an eligible unit under the program, or if the family is

unable to purchase a home within the maximum time established by the housing authority.

- E. Continued assistance under portability procedures is the next Section of this

#### ***24.14 MOVING WITH CONTINUED TENANT BASED ASSISTANCE***

- A. A family receiving homeownership assistance may move to a new unit with continued tenant-based assistance. The family may move either with housing choice voucher rental assistance (in accordance with rental assistance program requirements) or with housing choice voucher homeownership assistance (in accordance with homeownership option program requirements). The Greensboro Housing Authority will not commence continued tenant-based assistance for occupancy of the new unit so long as any family member owns any title or other interest in the prior home. No more than one move per year may occur in the program.
- B. The Greensboro Housing Authority must be able to determine that all initial requirements have been satisfied if a family that has received homeownership assistance wants to move to a new unit with continued homeownership assistance. However, the following requirements do not apply:
  - 1. The requirement for pre-assistance counseling is not applicable.
  - 2. The requirement that a family must be a first-time homeowner is not applicable.
- C. The Greensboro Housing Authority may deny permission to move with continued assistance in the following circumstances:
  - 1. The Greensboro Housing Authority may deny permission to move with continued rental or homeownership assistance if the housing authority determines that it does not have sufficient funding to provide continued assistance.
  - 2. At any time, the Greensboro Housing Authority may deny permission to move with continued rental or homeownership assistance in accordance with the next Section.

#### ***24.15 DENIAL OR TERMINATION OF ASSISTANCE FOR FAMILIES***

- A. At any time, the Greensboro Housing Authority may deny or terminate homeownership assistance in accordance with the same rules as it utilizes for the rental program.
- B. The same restrictions on admission or continued assistance in regard to criminal

activities shall apply to the homeownership program as the rental program.

- C. The Greensboro Housing Authority may deny or terminate assistance for violation of tenant obligations as previously described for the rental program.
- D. The PHA shall terminate housing choice voucher homeownership assistance for any member of family receiving homeownership assistance that is dispossessed from the home pursuant to a judgment or order of foreclosure on any mortgage (whether FHA-insured or non-FHA) securing debt incurred to purchase the home, or any refinancing of such debt. The Greensboro Housing Authority, in its discretion, may permit the family to move to a new unit with continued housing choice voucher rental assistance if the family can show that the default was for reasons beyond its control. However, the housing authority will deny such permission, if:
  - 1. The family defaulted on an FHA-insured mortgage; and
  - 2. The family fails to demonstrate that:
    - a. The family has conveyed title to the home, as required by HUD, to HUD or HUD's designee; and
    - b. The family has moved from the home within the period established or approved by HUD.

## **25.0 CONDUCTING BUSINESS IN ACCORDANCE WITH CORE VALUES AND ETHICAL STANDARDS**

### **25.1 PURPOSE**

This Code of Conduct establishes standards for employee and Commissioner conduct that will assure the highest level of public service. Recognizing that compliance with any ethical standards rests primarily on personal integrity and, specifically in this situation, with the integrity of the employees and Commissioners of GHA, this section sets forth those acts or omissions of acts that could be deemed injurious to the general mission of the Authority.

This Code of Conduct is not intended, nor should it be construed, as an attempt to unreasonably intrude upon the individual employee or Commissioner's right to privacy and the right to participate freely in a democratic society and economy.

## **25.2 CONFLICT OF INTEREST**

In accordance with 24 CFR 982.161, neither GHA nor any of its contractors or subcontractors may enter into any contract or arrangement in connection with the tenant-based programs in which any of the following classes of persons has any interest, direct or indirect, during his or her tenure with GHA or for one year thereafter:

- A. Any present or former member or officer of GHA (except a tenant commissioner);
- B. Any employees of GHA or any contractor, subcontractor or agent of GHA who formulates policy or who influences decisions with respect to the programs;
- C. Any public official, member of a governing body, or State or local legislator who exercises functions or responsibilities with respect to GHA programs; or
- D. Any member of the Congress of the United States.

Any member of the classes described in A-D must disclose their interest or prospective interest to GHA and HUD.

The Conflict-of-Interest prohibition under this section (25.2) may be waived by the HUD Field Office upon the request of GHA for good cause.

## **25.3 PROHIBITION OF SOLICITATION OR ACCEPTANCE OF GIFTS**

No Commissioner or Authority employee shall solicit any gift or consideration of any kind, nor shall any Authority employee accept or receive a gift having value in excess of \$25.00 regardless of the form of the gift, from any person who has an interest in any matter proposed or pending before the Authority.

## **25.4 HOUSING AUTHORITY ADMINISTRATIVE AND DISCIPLINARY REMEDIES OF VIOLATION OF HOUSING AUTHORITY CODE OF CONDUCT**

Violations of this Code of Conduct Policy will result in disciplinary action as outlined in GHA's Personnel Policy.

## **26.0 SUPPORT FOR OUR ARMEDFORCES**

### **26.1 SUPPORT DURING DEPLOYMENT**

A major and important component of our armed forces are the part-time military personnel that serve in various Reserve and National Guard units. The Greensboro Housing Authority is very supportive of these men and women.

An unfortunate fact of service in both the Reserves and National Guard is that from time to time their personnel are activated to full-time status and asked to serve our country in a variety of ways and circumstances. Whenever the Federal Government activates Reserve and/or National Guard personnel, the Greensboro Housing Authority wants to support these brave warriors in the following manners:

- A. If a family finds it necessary for another adult to temporarily move into a unit solely to serve by the temporary guardian will not be counted in determining family income. The presence of the temporary guardian will need to be approved by the landlord.
- B. Although typically a criminal background check is required before anyone can participate in the housing choice voucher program, this requirement will be waived for a temporary guardian. Instead, the background check will occur after the person moves into the assisted unit. If the results of the check dictate that the person is ineligible for the program, the family shall be given a reasonable time to find a replacement temporary guardian.
- C. Recognizing that activation in the Reserves or National Guard can be very disruptive to a family's income, the Greensboro Housing Authority will expeditiously re-evaluate a tenant's portion of the rent if requested to do so.
- D. A unit cannot be held by a family that is not residing in it as their primary residence for more than 180 consecutive calendar days because of a specific federal regulation. If all members of a military family are temporarily absent from the unit because a member of the family has been called to active duty, the family can retain control of the unit by paying the required rent and returning to the unit within 30 calendar days of the conclusion of the active-duty service. If the service extends beyond 180 calendar days, the Greensboro Housing Authority will seek a waiver of the 180-calendar day limit from HUD.

## **27.0 ANTI-FRAUD POLICY**

### **27.1 COMMITMENT TO COMBATING FRAUD**

The Greensboro Housing Authority is fully committed to combating fraud in its Housing Choice Voucher Program. It defines fraud as a single act or pattern of actions that include false statements, the omission of information, or the concealment of a substantive fact made with the intention of deceiving or misleading the Greensboro Housing Authority. It results in the inappropriate expenditure of public funds and/or a violation of Housing Choice requirements.



Although there are numerous different types of fraud that may be committed, the two most common are the failure to fully report all sources of income and the failure to accurately report who is residing in the residence. The Greensboro Housing Authority shall aggressively attempt to prevent all cases of fraud.

When a fraudulent action is discovered, the Greensboro Housing Authority shall take action. It shall do one or more of the following things depending on circumstances and what it determines appropriate:

- A. Require the tenant to immediately repay the amount in question;
- B. Require the tenant to enter into a satisfactory repayment agreement;
- C. Terminate the tenant's rental assistance;
- D. Refer the case for criminal prosecution; or
- E. Take such other action as the Greensboro Housing Authority deems appropriate.

## **28.0 PROJECT-BASING HOUSING VOUCHERS**

The Greensboro Housing Authority has determined that project-basing some of its housing vouchers (not to exceed 20% of our authorized housing choice voucher units plus other federally favored units as described below t) is in the community's interest. This effort is an appropriate option because it will deconcentrate poverty and expand housing and economic opportunity. The specifics of what the Housing Authority is seeking will be contained in an advertisement published in the manner prescribed by HUD that varies depending upon whether the units to be brought into the program are new construction, rehabilitated, or existing units. The actual selection of the units to be project-based shall also be in full accordance with HUD requirements. VASH and Family Unification Program vouchers can be project-based without additional HUD approval.

The 20% cap can be increased by an additional 10% in the following circumstances:

- A. The units are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302), and contained in the Continuum of Care Interim Rule at 24 CFR 578.3. See <https://www.federalregister.gov/d/2012-17546> and <https://www.federalregister.gov/d/2016-13684>.
- B. The units are specifically made available to house families that are comprised of or include a veteran. A veteran is an individual who has served in the United States armed forces other than those dishonorably discharged.
- C. The units provide supportive housing to persons with disabilities or to elderly persons.

The definitions of a person with disabilities and an elderly person are found at 24 CFR 5.403. Supportive housing means that the project makes supportive services available for all of the assisted families in the project and provides a range of services tailored to the needs of the residents occupying such housing. Such services may include (but are not limited to):

- meal service adequate to meet nutritional need,
- housekeeping aid,
- personal assistance,
- transportation services;
- health-related services;
- educational and employment services: or
- other services designed to help the recipient live in the community as independently as possible.

The Greensboro Housing Authority will include any project-based solicitation contemplating the use of this exception a requirement that the available services be listed and described I the response to the solicitation. Such supportive services need not be provided by the owner or on-site but must be reasonably available to the families receiving PBV assistance in the project. The Greensboro Housing Authority will not require participation as a condition of living in an excepted unit, although such services will be offered.

Note that in accordance with 24 CFR 983.354, with the exception of an assisted living facility, the owner of a PBV project may not require the assisted family to pay charges for meals or supportive services, and non-payment of such charges by the family is not grounds for termination of tenancy. In the case of an assisted living facility (as defined in § 983.3) receiving PBV assistance, owners may charge families for meals or supportive services. These charges may not be included in the rent to owner or the calculation of reasonable rent.

- D. The units are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey 5-Year Estimates.

These categories are separate and distinct from exceptions to the income-mixing requirements that limit the number and percentage of units within a particular project to which PBV assistance may be attached (no more than the greater of 25 units or 25 percent of the units), which is discussed later in this Administrative Plan.

If the Greensboro Housing Authority wishes to add PBV units under this exception authority, the Greensboro Housing Authority will submit all required information to the Field Office, and identify the exception category (or categories) for which the Greensboro Housing Authority will project-base additional units (up to an additional 10 percent above the normally applicable PBV program imitation) and the specific number of units that qualify under the exception category.

PBV units may only be covered by this 10 percent exception authority if the PBV HAP

contract was first executed on or after April 18, 2017.

Increased project cap. Up to the greater of 25 units or 40 percent (instead of the greater of 25 units or 25 percent) of the units in a project may be project-based when the project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey 5-Year Estimates. A project that qualifies for the increased project cap at the time of HAP contract execution continues to qualify for the exception for the length of the contract regardless of changes in the poverty rate for the census tract in which the project is located.

## **28.1 SELECTION OF PROPERTIES TOPROJECT-BASE**

### **A. Selection Policy**

The policies as set forth herein are adopted by the Greensboro Housing Authority for the purpose of administering the HCVP Project-Based Voucher program.

The Greensboro Housing Authority will select Project-Based Voucher proposals by either of the following two methods:

1. Greensboro Housing Authority will request Project-Based Voucher Proposals. The Greensboro Housing will not limit proposals to a single site or impose restrictions that explicitly or practically preclude other submissions of proposals for Project-Based Voucher housing on different sites. Greensboro Housing Authority will select PBV proposals that best meet the needs of underserved populations.
2. The selection of a proposal for housing assisted under a federal, state, or local government housing assistance, community development, or supportive services program that requires competitive selection of proposals (e.g., HOME, and units for which competitively awarded LIHTCs have been provided) where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the Project-Based Voucher proposal selection date. Also, the earlier competitive selection proposal must not have involved any consideration that the project would receive Project-Based Voucher assistance. In this case, the vouchers can be project-based merely on a vote of the Board of Commissioners.

Once a decision to project-base units has been made but before the process begins, the Greensboro Housing Authority will electronically submit required information to HUD (see PIH Notice 2015-05 or successor requirements) at least 14 calendar days before issuing an RFP or selection based on previous competition.

If the Greensboro Housing Authority will be selecting proposals under A (1) of this section, the Greensboro Housing Authority will issue a Request for Proposals

(RFP) inviting interested owners to participate in the Project-Based Voucher Program. In the Project-Based Voucher Program, assistance is attached to the project and may be in the form of existing housing, newly constructed housing or rehabilitated housing. The RFP may include all forms of housing or individual forms (e.g., newly constructed housing only).

The Greensboro Housing Authority will advertise the RFP by (1) advertisement in at least one newspaper of general circulation, or (2) mailing invitations to bid to all known available suppliers; or a combination of such methods.

The Greensboro Housing Authority will prepare a detailed RFP package outlining;

▪ Program Requirements to include:

- ineligible housing types and prohibition of assistance for units in subsidized housing; and
- program accessibility requirements of section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR part 8; and
- housing first occupied after March 13, 1991, must comply with design and construction requirements of the Fair Housing Amendments Act of 1988 and implementing regulations at 24 CFR 100.205, as applicable; and
- housing first occupied after January 19, 2017, shall have a broadband infrastructure available to all units.

▪ Application Requirements;

▪ Rating and Ranking of Applications; and

▪ Selection Process.

This information will be provided at the request of interested parties. The submission deadline date will also be a part of the RFP package. This will allow the Greensboro Housing Authority adequate time to examine the proposed site before the selection date. For existing housing, the Greensboro Housing Authority will inspect all of the units to determine whether the units substantially comply with the HQS.

After the closing date of the Request for Proposals, the Greensboro Housing Authority will review each proposal for completeness, determine if the proposed site meets the site selection standards, determine that the cap on number of Project-Based Voucher units in each project has not been exceeded, and score the proposal.

Projects in which the Greensboro Housing Authority has an ownership interest and is being completed to improve, develop, or replace a public housing property or site can be project-based without competition as long as the projected hard costs equal or exceed \$25,000 per unit. For purposes of this section, an ownership interest means that the PHA or its officers, employees, or agents are in an entity that holds

any such direct or indirect interest in the building, including, but not limited to an interest as: titleholder; lessee; a stockholder; a member, or general or limited partner; or a member of a limited liability corporation.

Prior to the selecting a project based on a previous competition or following a competition where the Greensboro Housing Authority has an ownership interest and is engaged in improving, developing or replacing a public housing property or site, the Greensboro Housing Authority will submit the information required by HUD at least 14 calendar days prior to issuing its RFP. The Greensboro Housing Authority will give written notification to the successful proposer(s) within five (5) business days of Board approval. Public notice of the selected proposals will be published in a newspaper of general circulation for the jurisdiction. The Greensboro Housing Authority will also notify those proposers that weren't selected within five (5) business days from Board approval. The denial letter will contain the procedures for appealing the selection.

The Greensboro Housing Authority will make documentation available for public inspection regarding the basis for the Greensboro Housing Authority selection of a Project-Based Voucher proposal.

(10) If proposers wish to appeal the selection process, they may do so by presenting their complaint in writing to the attention of the Executive Director within ten calendar days from the date contained on the denial letter from the Greensboro Housing Authority.

The Greensboro Housing Authority will seek to resolve all appeals in as informal a manner as possible. The appeal must contain, at a minimum, the following information:

- Name, address, and telephone number of the proposer appealing
- Identification of the RFP being appealed
- A statement of the reason for appealing
- Supporting exhibits, evidence, or documents to substantiate any arguments
- The form of relief requested

The Greensboro Housing Authority shall issue a decision on the appeal as expeditiously as possible after receiving all relevant information requested. The Greensboro Housing Authority may decide to suspend the award of project-based vouchers if the facts presented in the appeal warrant such action. This action will only be taken if the evidence is clear and convincing as to the existence of an impropriety and there are no other means of resolving the matter. If the Greensboro Housing Authority Executive Director believes that an impropriety exists, then the proposed award of project-based vouchers will be canceled or revised to comply

with the decision of the Chief Executive Officer.

If the appeal is not granted, the Chief Executive Officer will provide a written decision with justification for the denial of the appeal.

B. Requirements for Selection of Project-Base Housing

1. Housing Type

The Greensboro Housing Authority may attach Project-Based Voucher assistance for units in existing housing, newly constructed housing or rehabilitated housing. A housing unit is considered an existing unit if at the time of notice of the Greensboro Housing Authority selection, the units substantially comply with HQS.

2. Prohibition of Assistance for Ineligible Units

(a) Ineligible Units

The Greensboro Housing Authority will not attach or pay Project-Based Voucher assistance for units in the following types of housing:

- i. Shared housing.
- ii. Units on the grounds of a penal, reformatory, medical, mental, or similar public or private institution;
- iii. Nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care. Units in an assisted living facility are eligible if they provide home health care services such as nursing and therapy for residents of the housing;
- iv. Units that are owned or controlled by an educational institution or its affiliate and are designated for occupancy by students of the institution;
- v. Manufactured homes;
- vi. Cooperative housing; and
- vi. Transitional housing.

(b) High-rise Elevator Project for Families with Children

The Greensboro Housing Authority will not attach or pay Project-Based Voucher assistance to a high-rise elevator project that may be occupied by families with children unless the Greensboro Housing Authority determines there is no practical alternative and HUD approves such finding.

(c) Prohibition Against Assistance for Owner-Occupied Unit

The Greensboro Housing Authority will not attach or pay Project-Based Voucher assistance for a unit occupied by an owner of the housing.

(d) Prohibition Against Selecting a Unit Occupied by an Ineligible Family

The Greensboro Housing Authority will not select or enter into an Agreement or HAP contract for a unit occupied by a family ineligible for participation in the Project-Based Voucher Program.

3. Prohibition of Assistance for Units in Subsidized Housing

The Greensboro Housing Authority will not attach or pay Project-based Voucher assistance to units in any of the following types of subsidized housing:

- (a) A public housing dwelling unit;
- (b) A unit subsidized with any other form of HCVP assistance (tenant-based or project-based).
- (c) A unit subsidized with any governmental rent subsidy (a subsidy that pays all or any part of the rent).
- (d) A unit subsidized with any governmental subsidy that covers all or any part of the operating costs of the housing;
- (e) A unit subsidized with Section 236 rental assistance payments (12 U.S.C. 1715z-1). However, the Greensboro Housing Authority may attach assistance to a unit subsidized with Section 236 interest reduction payments;
- (f) A unit subsidized with rental assistance payments under Section 521 of the Housing Act of 1949, 42 U.S.C. 1490a (a Rural Housing Service Program). However, the Greensboro Housing Authority may attach assistance for a unit subsidized with Section 515 interest reduction payments (42 U.S.C. 1485);

- (g) A Section 202 project for non-elderly persons with disabilities (assistance under Section 162 of the Housing and Community Development Act of 1987, 12 U.S.C. 1701q note);
- (h) Section 811 project-based supportive housing for persons with disabilities (42 U.S.C. 8013).
- (i) Section 202 supportive housing for the elderly (12 U.S.C. 1701q);
- (j) A Section 101 rent supplement project (12 U.S.C. 1701s);
- (k) A unit subsidized with any form of tenant-based rental assistance under the HOME program, 42 U.S.C. 12701 et seq.).
- (l) A unit with any other duplicative federal, state, or local housing subsidy, as determined by HUD or by the Greensboro Housing Authority in accordance with HUD requirements. For this purpose, “housing subsidy” does not include the housing component of a welfare payment; a social security payment; or a federal, state, or local tax concession (such as relief from local real property taxes).

#### 4. Prohibition of Excess Public Assistance

The Greensboro Housing Authority will only provide Project-Based Voucher assistance in accordance with HUD subsidy layering regulations and other requirements. The subsidy layering review is intended to prevent excessive public assistance for the housing by combining (layering) housing assistance payment subsidy under the Project-Based Voucher Program with other governmental housing assistance from federal, state, or local agencies, including assistance such as tax concessions or tax credits.

The Greensboro Housing Authority will only enter into an Agreement or HAP contract after HUD, or an independent entity approved by HUD has conducted any required subsidy layering review and determined that the Project-Based Voucher assistance is in accordance with HUD subsidy layering requirements.

The Greensboro Housing Authority will require the owner to certify that the project has not received and will not receive (before or during the term of the HAP contract) any public assistance for acquisition, development, or operation of the housing other than the assistance disclosed in the subsidy layering review in accordance with HUD requirements.

#### 5. Cap on Number of Project-Based Voucher Units in Each Project



(a) Greater of 25 or 25 Percent Per Project Cap

The Greensboro Housing Authority will not select a proposal to provide Project-Based Voucher assistance for units in a project or enter into an Agreement or HAP contract to provide Project-Based Voucher assistance for units in a project if the total number of dwelling units in the project that will receive Project-Based Voucher Assistance during the term of the Project-Based Voucher HAP is more than the greater of 25 units or 25 percent of the number of the dwelling units in the project.

(b) Exception to the Greater of 25 Units or 25 Percent Per Project Cap

In the following instances, Project-Based Voucher units are not counted against the greater of 25 or 25 percent per project cap:

- (i) Units exclusively serving elderly families.
- (ii) Excepted units in a multi-family building.

*Note: "Excepted units" means units that are specifically made available for qualifying families;*

*"Qualifying families" means: Elderly or disabled families; or families receiving access to supportive services.*

*Supportive services mean those appropriate services made available to a family trying to achieve economic independence and self-sufficiency or live in the community as independently as possible and may include:*

- (1) *Childcare - child care of a type that provides sufficient hours of operation and serves an appropriate range of ages;*
- (2) *Transportation - transportation necessary to enable a participating family to receive available services, or to commute to their places of employment;*
- (3) *Education - remedial education; education for completion of secondary or post-secondary schooling;*
- (4) *Employment - job training, preparation, and counseling; job development and placement; and follow-up assistance after job placement and completion of the contract of participation;*

(5) *Personal welfare - substance/alcohol abuse treatment and counseling;*

(6) *Household skills and management - training in homemaking and parenting skills; household management; and money management;*

(7) *Other services - any other services and resources, including case management, reasonable accommodations for individuals with disabilities, that the Greensboro Housing Authority determines to be appropriate in assisting families to achieve economic independence or self-sufficiency.*

(ii) Projects that are in census tracts with a poverty rate of 20 percent or less.

(iii) Projects previously subject to certain federal rent restrictions or receiving another type of long-term housing subsidy provided by HUD.

## 6. Site Selection Standards

### (a) General Requirements

The Greensboro Housing Authority will not select a proposal for

existing housing, newly constructed, or rehabilitated Project-Based Voucher housing on a site or enter into an Agreement or HAP contract for units on the site until the Greensboro Housing Authority has determined that:

(i) Project-based assistance for housing at the selected site is consistent with the goal of whether the PBV development will provide opportunities for an underserved disabled population and expanding housing and economic opportunities as outlined in the Greensboro Housing Authority Annual and Five-Year Plan and this Administrative Policy. In making this determination, the Greensboro Housing Authority will utilize the following factors:

(1) Whether the census tract in which the proposed Project-Based Voucher development will be located is in a HUD-designated Enterprise Zone, Economic Community, or Renewal Community;

- (2) Whether a Project-Based Voucher development will be located in a census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition;
  - (3) Whether the census tract in which the proposed Project-Based Voucher development will be located is undergoing significant revitalization;
  - (4) Whether state, local, or federal dollars have been invested in the area that has assisted in the achievement of the statutory requirement;
  - (5) Whether new market rate units are being developed in the same census tract where the proposed Project-Based Voucher development will be located and the likelihood that such market rate units will positively impact the poverty rate in the area;
  - (6) If the poverty rate in the area where the proposed Project-Based Voucher development will be located is greater than 20 percent, the PHA should consider whether in the past five years there has been an overall decline in the poverty rate;
  - (7) Whether there are meaningful opportunities for educational and economic advancement in the census tract where the proposed Project-Based Voucher development will be located.
  - (8) Whether the PBV development will provide opportunities for an underserved disabled population.
- (i) The site is suitable from the standpoint of facilitating and furthering full compliance with applicable Civil Rights statutes and regulations, including the requirement that the site meet the Section 504 site selection requirements described in 24 FR 8.4(b)(5).
  - (i) The site meets the HQS site requirements at 24 CFR 982.401(1).
- (b) Existing and Rehabilitated Housing Site and Neighborhood Standards

The Greensboro Housing Authority will determine if a site for existing or rehabilitated housing meets the following site and

neighborhood standards. The site must:

- (i) Be adequate in size, exposure, and contour to accommodate the number and type of units proposed, and adequate utilities and streets must be available to service the site. (The existence of a private disposal system and private sanitary water supply for the site, approved in accordance with law, may be considered adequate utilities.)
  - (i) Promote greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons.
  - (i) Be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted standard housing of similar market rents.
  - (iv) Be so located that travel time and cost via public transportation or private automobile from the neighborhood to places of employment providing a range of jobs for lower-income workers is not excessive. While it is important that housing for the elderly not be totally isolated from employment opportunities, this requirement need not be adhered to rigidly for such projects.
- (c) New Construction Site and Neighborhood Standards

A site for newly constructed housing must meet the following site and neighborhood standards:

- (i) The site must be adequate in size, exposure, and contour to accommodate the number and type of units proposed, and adequate utilities (water, sewer, gas, and electricity) and streets must be available to service the site.
- (ii) The site must not be located in an area of minority concentration, except as permitted under paragraph (iii) below, and must not be located in a racially mixed area if the project will cause a significant increase in the proportion of minority to non-minority residents in the area.
- (ii) A project may be located in an area of minority concentration only if:
  - (1) Sufficient comparable opportunities exist for housing for minority families in the income range to be served by the proposed project outside area of minority concentration; or
  - (2) The project is necessary to meet overriding housing needs that cannot be met in that housing market area.

*Note: "Sufficient" does not require that in every locality there be an equal number of assisted units within and outside of areas of minority concentration. Rather, application of this standard should produce a reasonable distribution of assisted units each year so that, over a period of several years, it will approach an appropriate balance of housing choices within and outside areas of minority concentration. An appropriate balance will be determined in light of local conditions affecting the range of housing choices available for low-income minority families and in relation to the racial mix of the locality's population.*

*Units will be considered "comparable opportunities" if they have the same household type (elderly, disabled, family, large family) and tenure type (owner/renter); require approximately the same tenant contribution towards rent, serve the same income group, are located in the same housing market, and are in standard condition.*

*Application of the “comparable opportunities” standard involves assessing the overall impact of HUD-assisted housing on the availability of housing choices for low-income minority families in and outside areas of minority concentration, and must take into account the extent to which the following factors are present, along with other factors relevant to housing choice:*

- (A) A significant number of assisted housing units are available outside areas of minority concentration.*
- (B) There is significant integration of assisted housing projects constructed or rehabilitated in the past 10 years, relative to the racial mix of the eligible population.*
- (C) There are racially integrated neighborhoods in the locality.*
- (D) Programs are operated by the locality to assist minority families that wish to find housing outside areas of minority concentration.*
- (E) Minority families have benefited from local activities (e.g., acquisition and write-down of sites, tax relief programs for homeowners, acquisitions of units for use as assisted housing units) undertaken to expand choice for minority families outside of areas of minority concentration.*
- (F) A significant proportion of minority households have been successful in finding units in non-minority areas under the tenant-based assistance programs.*
- (G) Comparable housing opportunities have been made available outside areas of minority concentration through other programs.*

*Application of the “overriding housing needs”*

*criterion, for example, permits approval of sites that are an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood and of sites in a neighborhood experiencing significant private investment that is demonstrably improving the economic character of the area (a “revitalizing area”). An “overriding housing need,” however, may not serve as the basis for determining that a site is acceptable, if the only reason the need cannot otherwise be feasibly met is that discrimination on the basis of race, color, religion, sex, national origin, age, familial status, or disability renders sites outside areas of minority concentration unavailable or if the use of this standard in recent years has had the effect of circumventing the obligation to provide housing choice.*

- (iv) The site must promote greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons.
- (v) The neighborhood must not be one that is seriously detrimental to family life or in which substandard dwellings or other undesirable conditions predominate, unless there is a concerted program actively in progress to remedy the undesirable conditions.
- (vi) The housing must be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted standard housing of similar market rents.
- (vi) Except for new construction, housing designed for elderly persons, travel time, and cost via public transportation or private automobile from the neighborhood to places of employment providing a range of jobs for lower-income workers must not be excessive.

## 7. Environmental Review

The Greensboro Housing Authority will not enter into an Agreement or HAP contract with an owner nor will the Greensboro Housing Authority, the owner or its contractors acquire, dispose of, demolish, or construct real property or commit or expend program or local funds for Project-Based Voucher activities until one of the following occurs:

- (a) The responsible entity (a unit of general local government, a county or a state) has completed the environmental review procedures required by 24 CFR part 58, and HUD has approved the environmental certification and request for release of funds;
- (b) The responsible entity has determined that the project to be assisted is exempt under 24 CFR 58.34 or is categorically excluded and not subject to compliance with environmental laws under 24 CFR 58.35(b); or
- (c) HUD has performed an environmental review under 24 CFR part 50 and has notified the Greensboro Housing Authority in writing of environmental approval of the site.

The Greensboro Housing Authority will require the owner to carry out mitigating measures required by the responsible entity (or HUD, if applicable) as a result of the environmental review.

## 8. Greensboro Housing Authority Owned Units

### (a) Selection of Greensboro Housing Authority Owned Units

If the Greensboro Housing Authority selects its own proposal, the HUD field office or a HUD approved independent entity will review the selection process to determine that the Greensboro Housing Authority units were appropriately selected based on the selection procedures as outlined in this HCVP Administrative Plan. HUD approval must be received for the arrangements prior to entering into the AHAP for new construction and rehabilitation or prior to selecting existing housing. The information required is outlined in PIH Notice 2015-5.

### (b) Inspection and Determination of Reasonable Rent

The Greensboro Housing Authority will have an independent entity approved by HUD perform the following program services:

- (i) Determination of rent to owner as outlined in 28.6(A) and (B). The independent entity approved by HUD must establish the initial contract rents based on an appraisal by a licensed state-certified appraiser; and



(ii) Inspections as outlined in Section 28.2 of this Administrative Plan.

(c) Nature of Independent Entity

The independent entity that performs these program services may be the unit of general local government for the Greensboro Housing Authority's jurisdiction (unless the Greensboro Housing Authority is itself the unit of general local government or an agency of such government) or another HUD-approved public or private independent entity.

(d) Payment to Independent Entity and Appraiser

The Greensboro Housing Authority will compensate the independent entity and appraiser from the Greensboro Housing Authority's ongoing administrative fee income (including the amounts credited to the administrative fee reserve).

The Greensboro Housing Authority will not use other program receipts to compensate the independent entity and appraiser for their services.

The Greensboro Housing Authority, independent entity, and appraiser will not charge the family any fee for the appraisal, or the services provided by the independent entity.

## **28.2 HOUSING QUALITY STANDARDS**

Project Based Voucher Program requirements:

PBV units, while funded through the Tenant-Based Rental Assistance/HCV program appropriation, are regulated under the Lead Safe Housing Rule (LSHR) as project-based assistance under 24 CFR Part 35, Subpart H. This program clarification was issued in a 2004 amendment to the LSHR.<sup>6</sup> Under Subpart H, owners of target housing properties receiving more than \$5,000 annually per unit in project-based assistance are required to ensure that target housing receives a lead risk assessment by a certified risk assessor, regardless of whether there is a child under age 6 in residence, and that occupants are notified of the results of the risk assessment.

Owners must ensure that lead-based paint hazards identified by the risk assessment receive interim controls by a certified renovation or abatement firm, that clearance by a certified risk assessor is passed before re-occupancy occurs, and that assisted occupants are notified of the results of the hazard reduction activity. Owners must monitor and maintain any remaining lead-based paint and the hazard controls, with annual visual assessments and a reevaluation with dust testing every two years by a certified risk assessor. The housing authority is responsible for the Monitoring of owner's compliance with LSHR (Lead Safe Housing Rule). Please refer to PIH notice 2017-13 for further guidance on monitoring steps to be taken by the owner and GHA.

A. Inspecting Units

1. Pre-Selection Inspection

(a) Inspection of Site

The Greensboro Housing Authority will examine the proposed site to confirm its appropriateness before the proposal selection date.

2. Inspection of Existing Units

The Greensboro Housing Authority will inspect all the units before the proposal selection date and will determine whether the units substantially comply with the HQS. To qualify as existing housing, units must substantially comply with the HQS on the proposal selection date. The Greensboro Housing Authority will not execute the HAP contract until the units fully comply with the HQS.

B. Pre-HAP Contract Inspections

The Greensboro Housing Authority will inspect each contract unit before execution of the HAP contract. The Greensboro Housing Authority will not enter into a HAP contract covering a unit until the unit fully complies with the HQS.

C. Turnover Inspections

The Greensboro Housing Authority will inspect the unit before providing assistance to a new family in a contract unit. The Greensboro Housing Authority will not provide assistance on behalf of the family until the unit fully complies with the HQS.

D. Regular Inspections

1. At least biennially during the term of the HAP contract, the Greensboro Housing Authority will inspect a random sample, consisting of at least 20 percent of the contract units in each project, to determine if the contract units and the premises are maintained in accordance with the HQS.

*Note: Turnover inspections pursuant to paragraph C. of this section will not count toward meeting this annual inspection requirement.*

2. If more than 20 percent of the annual sample of inspected contract units in a building fail the initial inspection, the Greensboro Housing Authority will re-inspect 100 percent of the contract units in the building.

E. Other Inspections

1. The Greensboro Housing Authority will inspect contract units whenever needed to determine that the contract units comply with the HQS, that the owner is complying with the HQS, and that the owner is providing maintenance, utilities, and other services in accordance with the HAP contract. The Greensboro Housing Authority will take into account complaints and any other information coming to its attention in scheduling inspections.
2. The Greensboro Housing Authority will conduct follow-up inspections needed to determine if the owner (or the family if responsible) has corrected an HQS violation. Additionally, the Greensboro Housing Authority will conduct inspections to determine the basis for exercise of contractual and other remedies for owner or family violation of the HQS.
3. The Greensboro Housing Authority will include a representative sample of both tenant-based and project-based units in conducting its supervisory quality control HQS inspections.

F. Inspecting Greensboro Housing Authority Owned Units

1. For Greensboro Housing Authority owned units, the inspections required under this section will be performed by an independent entity approved by HUD. The independent entity that performs these inspections may be the unit of general local government for the Greensboro Housing Authority jurisdiction (unless the Greensboro Housing Authority is itself the unit of general local government or an agency of such government) or another HUD-approved public or private independent entity.
2. The independent entity shall provide a copy of each inspection report to the Greensboro Housing Authority and to the HUD field office where the project is located.
3. The Greensboro Housing Authority will take all necessary actions in response to inspection reports from the independent entity, including exercise of contractual remedies for violation of the HAP contract by the owner (Greensboro Housing Authority).

**28.3 REQUIREMENTS FOR REHABILITATED AND NEWLY CONSTRUCTED UNITS**

This section only applies to newly constructed or rehabilitated housing and does not apply to existing housing. Newly constructed or rehabilitated housing cannot be selected as existing housing at a later date.

A. Purpose and Content of the Agreement to Enter into HAP Contract

## 1. Requirement

The Greensboro Housing Authority will enter into an Agreement with the owner. The Agreement will be in the form required by HUD.

## 2. Purpose of the Agreement

In the Agreement, the owner agrees to develop the contract units to comply with the HQS and the Greensboro Housing Authority agrees that, upon timely completion of such development in accordance with the terms of the Agreement, the Greensboro Housing Authority will enter into a HAP contract with the owner for the contract units.

## 3. Description of Housing

a) At a minimum, the Agreement will describe the following features of the housing to be developed (newly constructed or rehabilitated) and assisted under the Project-Based Voucher Program:

- (i) Site;
- (ii) Location of contract units on site;
- (iii) Number of contract units by area (size) and number of bedrooms and bathrooms;
- (iv) Services, maintenance, or equipment to be supplied by the owner without charges in addition to the rent to owner;
- (v) Utilities available to the contract units (including broadband), including a specification of utility services to be paid by owner (without charges in addition to rent), and utility services to be paid by the tenant;
- (vi) Indication of whether or not the design and construction requirements of the Fair Housing Act and implementing regulations at 24 CFR 100.205 and the accessibility requirements of section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.22 and 8.23 apply to units under the Agreement. If these requirements are applicable, any required work item resulting from these requirements will be included in the description of work to be performed under the Agreement;
- (vii) Estimated initial rents to owner for the contract units;

(viii) Description of the work to be performed under the Agreement. If the Agreement is for rehabilitation of units, the work description will include the rehabilitation work write up and, where determined necessary by the Greensboro Housing Authority, specifications and plans. If the Agreement is for new construction, the work description will include the working drawings and specifications.

b.) At a minimum, the housing must comply with the HQS.

B. Execution of the Agreement

1. Prohibition of Excess Subsidy

The Greensboro Housing Authority will not enter the Agreement with the owner until the subsidy layering review is completed.

2. Environmental Approval

The Greensboro Housing Authority will not enter the Agreement with the owner until the environmental review is completed and the Greensboro Housing Authority has received the environmental approval.

3. Prompt Execution of Agreement

The Agreement will be executed promptly after the Greensboro Housing Authority notice of proposal selection to the selected owner.

C. Conduct of Development Work

1. Development Requirements

The owner must carry out development work in accordance with the Agreement and the requirements of this section.

2. Labor Standards

(a) In the case of an Agreement of nine or more contract units (whether or not completed in stages), the owner and the owner's contractors and subcontractors must pay Davis-Bacon wages to laborers and mechanics employed in development of the housing.

- (b) The HUD prescribed form of Agreement shall include the labor standards clauses required by HUD, such as those involving Davis-Bacon wage rates.
- (c) The owner and the owner's contractors and subcontractors must comply with the Contract Work Hours and Safety Standards Act, Department of Labor regulations in 29 CFR part 5, and other applicable federal labor relations laws and regulations. The Greensboro Housing Authority will monitor compliance with labor standards.

3. Equal Opportunity

- (a) The owner must comply with Section 3 of the Housing and Urban Development Act of 1968 and the implementing regulations at 24 CFR part 135.
- (b) The owner must comply with federal equal employment opportunity requirements of Executive Orders 11246 as amended, 11625, 12432 and 12138.

4. Eligibility to Participate in Federal Programs and Activities

The Agreement and HAP contract will include a certification by the owner that the owner and other project principals (including officers and principal members, shareholders, investors, and other parties having a substantial interest in the project) are not on the U.S. General Services Administration list of parties excluded from federal procurement and non-procurement programs.

5. Disclosure of Conflict of Interest

The owner must disclose any possible conflict of interest that would be a violation of the Agreement, the HAP contract, or HUD regulations.

D. Completion of Housing

1. Completion Deadline

The owner must develop and complete the housing in accordance with the Agreement. The Agreement will specify the deadlines for completion of the housing and for submission by the owner of the required evidence of completion.

2. Required Evidence of Completion

- (a) Minimum Submission

At a minimum, the owner must submit the following evidence of completion to the Greensboro Housing Authority in the form and manner required by the Greensboro Housing Authority:

- (i) Owner certification that the work has been completed in accordance with the HQS and all requirements of the Agreement; and Owner certification that the owner has complied with labor standards and equal opportunity requirements in development of the housing.

(b) Additional Documentation

At the discretion of the Greensboro Housing Authority, the Agreement may specify additional documentation that must be submitted by the owner as evidence of housing completion. For example, such documentation may include:

- (i) A certificate of occupancy or other evidence that the units comply with local requirements (such as code and zoning requirements); and
- (ii) An architect's certification that the housing complies with:
  - (A) HUD housing quality standards;
  - (B) State, local, or other building codes;
  - (C) Zoning;
  - (D) The rehabilitation work write-up (for rehabilitated housing) or the work description (for newly constructed housing); or
  - (E) Any additional design or quality requirements pursuant to the Agreement.

E. Greensboro Housing Authority Acceptance of Completed Units

1. Greensboro Housing Authority Determination of Completion

When the Greensboro Housing Authority has received owner notice the

housing is completed:

- a. The Greensboro Housing Authority will inspect to determine if the housing has been completed in accordance with the Agreement, including compliance with the HQS and any additional requirement(s) imposed by the Greensboro Housing Authority under the Agreement.
- b. The Greensboro Housing Authority will determine if the owner has submitted all required evidence of completion.
- c. If the work has not been completed in accordance with the Agreement, the Greensboro Housing Authority will not enter into the HAP contract.

## 2. Execution of HAP Contract

If the Greensboro Housing Authority determines that the housing has been completed in accordance with the Agreement and that the owner has submitted all required evidence of completion, the Greensboro Housing Authority will submit the HAP contract for execution by the owner and will then execute the HAP contract.

### **28.4 HOUSING ASSISTANCE PAYMENT CONTRACT**

This section applies to all Project-Based Voucher assistance including assistance for existing, newly constructed, or rehabilitated housing.

#### A. Purpose of the HAP Contract

##### 1. Requirement

The Greensboro Housing Authority will enter into a HAP contract with the owner. The HAP contract must be in the form required by HUD.

##### 2. Purpose of HAP Contract

- (a) The purpose of the HAP contract is to provide housing assistance payments for eligible families.
- (b) The Greensboro Housing Authority makes housing assistance payments to the owner in accordance with the HAP contract. Housing assistance is paid for contract units leased and occupied by eligible families during the HAP contract term.

#### B. HAP Contract Information



The HAP contract must specify:

1. The total number of contract units by number of bedrooms;
2. Information needed to identify the site and the building or buildings where the contract units are located. The information must include the project's name, street address, city or county, state and zip code, block and lot number (if known), and any other information necessary to clearly identify the site and the building;
3. Information needed to identify the specific contract units in each building. The information must include the number of contract units in the building, the location of each contract unit, the area of each contract unit, and the number of bedrooms and bathrooms in each contract unit;
4. Services, maintenance, and equipment to be supplied by the owner without charges in addition to the rent to owner;
5. Utilities available to the contract units, including a specification of utility services to be paid by the owner (without charges in addition to rent) and utility services to be paid by the tenant;
6. Features provided to comply with program accessibility requirements of Section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR part 8;
7. The HAP contract term;
8. The number of units in any project that will exceed the PBV cap, which will be set-aside for occupancy by qualifying families (elderly or disabled families and families receiving supportive services) and
9. The initial rent to owner (for the first 12 months of the HAP contract term).

C. When HAP Contract is Executed

1. PHA Inspection of Housing
  - (a) Before execution of the HAP contract, the Greensboro Housing Authority will inspect each contract unit in accordance with Section 28.2 B.
  - (b) The Greensboro Housing Authority will not enter into a HAP contract for any contract unit until the Greensboro Housing Authority has determined that the unit complies with the HQS.

2 Existing Housing

The Greensboro Housing Authority will promptly execute the HAP contract after the Greensboro Housing Authority selection of the owner proposal and Greensboro Housing Authority inspection of the housing.

3 Newly Constructed or Rehabilitated Housing

The Greensboro Housing Authority will execute the HAP contract after the Greensboro Housing Authority has inspected the completed units and has determined that the units have been completed in accordance with the Agreement and the owner has furnished all required evidence of completion.

When executing the HAP contract, the owner must certify that the units have been completed in accordance with the Agreement.

D. Term of the HAP Contract

1. Initial Term and Any Extensions

The Greensboro Housing Authority may enter into a HAP contract with an owner for an initial term of up to twenty years for each contract unit. The length of the term of the HAP contract for any contract unit may not be less than one year, nor more than twenty years.

Within one year before expiration, the Greensboro Housing Authority may agree to extend the term of the HAP contract for an additional term of up to twenty additional years if the Greensboro Housing Authority determines an extension is appropriate to continue providing affordable housing for low-income families. Any extension of the term must be on the form and subject to the conditions prescribed by HUD at the time of the extension.

The term and potential extensions the Greensboro Housing Authority is willing to enter into will be discussed in the project selection process.

2 Termination by the Greensboro Housing Authority – Insufficient Funding

The HAP contract will provide that the term of the Greensboro Housing Authority's contractual commitment is subject to the availability of sufficient appropriated funding (budget authority) as determined by HUD or by the Greensboro Housing Authority in accordance with HUD instructions.

*Note: "Sufficient funding" means the availability of appropriations, and of funding under the ACC from such appropriations, to make full*

*payment of housing assistance payments payable to the owner for any contract year in accordance with the terms of the HAP.*

The Greensboro Housing Authority will not fail to make the HAP payment until after it has made all possible allowable cost saving efforts in the tenant-based program as set forth in Section 29 of this policy and there is still insufficient funding.

If it is determined that there may not be sufficient funding to continue housing assistance payments for all contract units and for the full term of the HAP contract, the Greensboro Housing Authority may terminate the HAP contract by notice to the owner for all or any of the contract units. Such action by the Greensboro Housing Authority will be implemented in accordance with HUD instructions.

3. Termination by Owner – Reduction Below Initial Rent

The owner may terminate the HAP contract, upon notice to the Greensboro Housing Authority, if the amount of rent to the owner is reduced below the initial approved rent. In this case, the assisted families residing in the contract units will be offered tenant-based voucher assistance.

E. HAP Contract Amendments (to add or substitute contract units)

1. Amendment to Substitute Contract Units

At the discretion of the Greensboro Housing Authority, and subject to all Project-Based Voucher requirements, the HAP contract may be amended to substitute a different unit with the same number of bedrooms in the same project for a previously covered contract unit. Prior to such substitution, the Greensboro Housing Authority will inspect the proposed substitute unit and will determine the reasonable rent for such unit and the fact that it passes HQS.

2. Amendment to Add Contract Units

At the discretion of the Greensboro Housing Authority, and provided that the total number of units in a project that will receive Project-Based Voucher assistance or other project-based assistance will not exceed the greater of 25 or 25 percent of the number of dwelling units (assisted or unassisted) in the project or the 20 percent of authorized budget authority of the Greensboro Housing Authority, a HAP contract may be amended to add additional Project-Based Voucher contract units in the same project. An Amendment to the HAP contract is subject to all Project-Based Voucher requirements (e.g., rents are reasonable), except that a new Project-Based Voucher request for proposals (competition) is not required. The anniversary and expiration dates of the HAP contract for the additional units

must be the same as for the anniversary and expiration dates of the HAP contract term for the Project-Based Voucher units originally placed under HAP contract. This shall only be done after informing the HUD Field Office with the information it requires and the rationale used to expand assistance to the specific project.

3. Staged Completion of Contract Units

Even if contract units are placed under the HAP contract in stages commencing on different dates, there is a single annual anniversary for all contract units under the HAP contract. The annual anniversary for all contract units is the annual anniversary date for the first contract units placed under the HAP contract. The expiration of the HAP contract for all the contract units completed in stages must be concurrent with the end of the HAP contract term for the units originally placed under HAP contract.

4. Condition of Contract Units

(a) Owner Maintenance and Operation

The owner must maintain and operate the contract units and premises in accordance with the HQS, including performance of ordinary and extraordinary maintenance.

The owner must provide all the services, maintenance, equipment, and utilities specified in the HAP contract with the Greensboro Housing Authority and in the lease with each assisted family.

At the discretion of the Greensboro Housing Authority, the HAP contract may also require continuing owner compliance during the HAP term with additional housing quality requirements specified by the Greensboro Housing Authority (in addition to, but not in place of, compliance with the HUD-prescribed HQS). Such additional requirements will be designed to assure continued compliance with any design, architecture, or quality requirement specified in the Agreement.

5. Remedies for HQS Violation

The Greensboro Housing Authority will vigorously enforce the owner's obligation to maintain contract units in accordance with the HQS. The Greensboro Housing Authority will not make any HAP payment to the owner for a contract unit covering any period during which the contract unit does not comply with the HQS.

If the Greensboro Housing Authority determines that a contract unit is not in accordance with the housing quality standards (or other HAP contract requirement), the Greensboro Housing Authority may exercise any of its

remedies under the HAP contract for all or any contract units. Such remedies include termination of housing assistance payments, abatement or reduction of housing assistance payments, reduction of contract units, and termination of the HAP contract.

#### 6. Maintenance and Replacement – Owner’s Standard Practice

Maintenance and replacement (including redecoration) must be in accordance with the standard practice for the project concerned as established by the owner.

#### 7. Owner Responsibility

The owner is responsible for performing all of the owner responsibilities under the Agreement and the HAP contract. 24 CFR part 982.452 applies as follows:

- (a) Performing all management and rental functions for the assisted unit, including selecting a voucher-holder to lease the unit, and deciding if the family is suitable for tenancy of the unit.
- (b) Maintaining the unit in accordance with HQS, including performance of ordinary and extraordinary maintenance.
- (c) Complying with equal opportunity requirements.
- (d) Preparing and furnishing to the Greensboro Housing Authority information required under the HAP contract.
- (e) Collecting from the family:
  - (i) Any security deposit.
  - (ii) The tenant contribution (the part of rent owner not covered by the housing payment).
  - (iii) Any charges for unit damage by the family.
  - (iv) Enforcing tenant obligations under the lease.
  - (v) Paying for utilities and services (unless paid by the family under the lease).
- (vi) Provisions on modifications to a dwelling unit occupied or to be occupied by a disabled person see the following note: *Note: Reasonable Modification of Existing Premises*

(A) *It shall be unlawful for any person to refuse to*

*permit, at the expense of a handicapped person, reasonable modifications of existing premises, occupied or to be occupied by a handicapped person, if the proposed modifications may be necessary to afford the handicapped person full enjoyment of the premises of a dwelling. In the case of a rental, the landlord may, where it is reasonable to do so, condition permission for a modification on the renter agreeing to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear expected. The landlord may not increase for handicapped persons any customarily required security deposit.*

*However, where it is necessary in order to ensure with reasonable certainty that funds will be available to pay for the restorations at the end of the tenancy, the landlord may negotiate as part of such a restoration agreement a provision requiring that the tenant pay into an interest-bearing escrow account, over a reasonable period, a reasonable amount of money not to exceed the cost of the restorations. The interest in any such account shall accrue to the benefit of the tenant.*

- (B) However, where it is necessary in order to ensure with reasonable certainty that funds will be available to pay for the restorations at the end of the tenancy, the landlord may negotiate as part of such a restoration agreement a provision requiring that the tenant pay into an interest-bearing escrow account, over a reasonable period, a reasonable amount of money not to exceed the cost of the restorations. The interest in any such account shall accrue to the benefit of the tenant.*

*A landlord may condition permission for a modification on the renter providing a reasonable description of the proposed modifications as well as reasonable assurances that the work will be done in a workmanlike manner and that any required building permits will be obtained.*

## 8. Owner Certification

By execution of the HAP contract, the owner certifies that at such execution and at all times during the term of the HAP contract:

- (a) All contract units are in good and tenantable condition. The owner is maintaining the premises and all contract units in accordance with the HQS.
- (b) The owner is providing all the services, maintenance, equipment, and utilities as agreed to under the HAP contract and the leases with assisted families.
- (c) Each contract unit for which the owner is receiving housing assistance payments is leased to an eligible family referred by the Greensboro Housing Authority, and the lease is in accordance with the HAP contract and HUD requirements.
- (c) To the best of the owner's knowledge, the members of the family reside in each contract unit for which the owner is receiving housing assistance payments, and the unit is the family's only residence.
- (d) The owner (including a principal or other interested party) is not the spouse, parent, child, grandparent, grandchild, sister, or brother of any member of a family residing in a contract unit.
- (e) The amount of the housing assistance payment is the correct amount due under the HAP contract.
- (f) The rent to owner for each contract unit does not exceed rents charged by the owner for other comparable unassisted units.
- (g) Except for the housing assistance payment and the tenant rent as provided under the HAP contract, the owner has not received and will not receive any payment or other consideration (from the family, the Greensboro Housing Authority, HUD, or any other public or private source) for rental of the contract unit.
- (h) The participating family does not own or have any interest in the contract unit.

## **28.5 OPERATION OF PROJECT-BASED PROPERTIES**

### **A. Project-Based Waiting List**

The Greensboro Housing Authority shall use a separate waiting list for admission to the Project-Based HCVP Assistance Program. All applicants will be maintained by bedroom size, then preference and date and time of application. If an applicant rejects an offer of assistance of the Project-Based Assistance Program, the rejection will not alter the applicant's position on the HCVP Tenant Based Assistance Program. Greensboro Housing Authority may use separate waiting lists for PBV units in individual projects or buildings where accommodations have been made for special needs populations. Greensboro Housing Authority may also elect to

accept referrals which identify special needs populations that may be best served by developments providing targeted accommodations.

The waiting list for the Project-Based HCVP Assistance Program will be maintained in accordance with the following guidelines:

1. The application will be a permanent file.
2. Substantive contacts between the Greensboro Housing Authority and the will be documented in the YARDI System.

B. Admission Preferences

Admission preferences will be consistent with all applicable Federal nondiscrimination and civil rights statutes and requirements.

The Greensboro Housing Authority will select families based on the following preferences within each bedroom size category and on our local housing needs and priorities.

Greensboro Housing Authority will give priority and maintain a separate waiting list for those families living in GHA-owned communities that will be displaced due to asset repositioning, redevelopment or relocation.

- A. Disaster Victims who are Public Housing Residents in another jurisdiction affected by a natural disaster mandated by the Department of Housing and Urban Development or victims by a natural disaster, as designated by local, state or federal government, within the Greensboro Housing Authority's jurisdiction.
- B. B. Families with an adult member currently and consecutively employed the for past 12 months. Those working in the GHA's jurisdiction can get a preference but not those attending school in Greensboro.  
Or Head, spouse, or sole member is age 62 or older.  
Or Head, spouse, or is a sole member is disabled based on HUD definition.  
Or, enrolled full-time in an accredited non-profit institution of higher education (university, college, or community college); Full-time students must have completed at least the first year of their academic requirements and continuing. Graduates must be gainfully employed within a six-month time frame.  
Or, enrolled in a job-training program, or a program that prepares someone for a job. Persons on job training or job readiness programs must complete at least 50% of their course work; and college graduates or graduates of job training or job readiness programs must be gainfully employed to receive this preference.
- C. Displaced person(s): Individuals or families displaced by public; or private action or



natural disaster. This Preference includes individuals or families who have received a written condemnation notice from the City of Greensboro indicating condemnation of their rental unit is imminent. Renters who damage the rental home or are otherwise responsible for causing the condemnation are not eligible for this preference.

- D. All other applicants that reside in GHA jurisdiction.
- E. E. Applicants who satisfy preference criteria but who reside outside of GHA's jurisdiction.

#### Selection from the Waiting List

If an applicant is removed from the Project-Based Assistance Program waiting list because of the rejection of an offer of a unit, the rejection will not alter the applicants' position on the HCVP Tenant Based Assistance Program waiting list. Likewise, if the owner rejects the available applicant, the rejection will not be counted against the one unit offer and the family will maintain their position on the Project-Based HCVP Assistance Program. The owner must promptly notify the Greensboro Housing Authority in writing if an applicant is rejected and the grounds for the rejection.

Under this plan, the first qualified applicant in sequence on the HCVP Project-Based Assistance Program waiting list will be made an offer of project-based assistance based on the unit size available. If the available unit being offered is a unit with special accessibility features for persons with disabilities, the Greensboro Housing Authority will skip over families not requiring the accessible unit to reach a family who does require such accommodation

Non-mobility impaired families will be offered these units if no family on the waiting list requires these features. The applicant family will only have one chance to accept a unit offer. If the applicant family rejects the offer, his or her name will be removed from the waiting list and he or she will have to re-apply. The applicant family will be notified in writing of the reason they are being removed from the waiting list and their right to an informal review as described in Section 4.8.

If more than one unit of the appropriate type and size is available, the first unit to be offered will be the first unit that is ready for occupancy.

The Greensboro Housing Authority will maintain a record of units offered, including location, date and circumstances of each offer and each acceptance or rejection, including the reason for the rejection.

All HCVP Tenant Based Assistance waiting list families who want project-based units will be permitted to place their names on the HCVP Project-Based Assistance Program waiting list.

Notwithstanding the above, if necessary to meet the statutory requirement that 75% of newly admitted families in any fiscal year be families who are extremely low-income (unless a different target is agreed to by HUD), the Greensboro Housing Authority retains the right to skip higher income families on the waiting list to reach extremely low-income families. This measure will only be taken if it appears the goal will not otherwise be met. To ensure this goal is met, the Housing Authority will monitor incomes of newly admitted families and the income of the families on the waiting list.

### ***28.6 Project-Based Briefing***

When the Greensboro Housing Authority selects a family from the waiting list, the family will be invited to attend a briefing virtual or in person explaining how the project-based program works. In order to be eligible for a vacant unit, all adult family members are required to attend the briefing. If they cannot attend the originally scheduled briefing, they may attend a later session. If the family fails to attend two briefings without good cause, they will be denied admission.

If an applicant with a disability requires auxiliary aids to gain full benefit from the briefing, the Greensboro Housing Authority will furnish such aids where doing so would not result in a fundamental alteration of the nature of the program or an undue financial or administrative burden. In determining the most suitable auxiliary aid, the Greensboro Housing Authority will give primary consideration to the requests of the applicant. Families unable to attend a briefing due to a disability may request a reasonable accommodation such as having the briefing presented at an alternate location.

The briefing will cover at least the following subjects:

1. A description of how the program works;
2. Family and owner responsibilities;
3. The fact that the subsidy is tied to the unit. After the initial 12-month period, the family has the right to move with continued tenant-based rental

assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance; and

4. A description of the Greensboro Housing Authority's policy on providing information to owners.

### **28.7 Project-Based Briefing Packet**

During the briefing, the Housing Authority will give the family a packet covering at least the following subjects:

1. How the Housing Authority determines the housing assistance payment and total tenant payment for the family (including a copy of the utility allowances);
2. A statement of the Housing Authority's policy on providing information to prospective owners. This policy requires applicants to sign disclosure statements allowing the Housing Authority to provide prospective owners with the family's current and prior addresses and the names and addresses of the landlords for those addresses;
3. The HUD-required lead-based paint brochure;
4. Information on Federal, State, and local equal opportunity laws; the brochure "Fair Housing: It's Your Right;" and a copy of the housing discrimination complaint form;
5. The family and owner responsibilities under the lease and HAP contract;
6. The grounds upon which the Housing Authority may terminate assistance because of the family's action or inaction; and
7. Greensboro Housing Authority informal hearing procedures, including when the Housing Authority is required to provide the opportunity for an informal hearing, and information on how to request a hearing.

### **28.8 Leasing of Contract Units**

1. Owner Selection of Tenants

During the term of the HAP contract, the owner must lease contract units only to eligible families selected and referred by the Greensboro Housing Authority from the Greensboro Housing Authority waiting list.

The owner is responsible for adopting written tenant selection procedures that are consistent with the purpose of improving housing opportunities for very-low income families and reasonably related to program eligibility and

an applicant's ability to perform the lease obligations.

An owner must promptly notify in writing any rejected applicant of the grounds for any rejection.

2. Size of Unit

The contract unit leased to each family must be appropriate for the size of the family under the Greensboro Housing Authority's subsidy standards.

## 28.9 Vacancies

1. Filling Vacant Units

The owner must promptly notify the Greensboro Housing Authority of any vacancy (or expected vacancy) in a contract unit. After receiving the owner notice, the Greensboro Housing Authority will make every reasonable effort to promptly refer a sufficient number of families to the owner to fill such vacancies.

The owner must lease vacant contract units only to eligible families on the Greensboro Housing Authority waiting list referred by the Greensboro Housing Authority.

It is expected that the Greensboro Housing Authority and the owner will make reasonable good faith efforts to minimize the likelihood and length of any vacancy.

2. Reducing Number of Contract Units

If any contract units have been vacant for a period of 120 days or more since the owner notice of vacancy (and notwithstanding the reasonable good faith efforts of the Greensboro Housing Authority to fill such vacancies), the Greensboro Housing Authority may give notice to the owner amending the HAP contract to reduce the number of contract units by subtracting the number of contract units (by number of bedrooms) that have been vacant for such period.

## 28.10 Tenant Screening

The Greensboro Housing Authority has no responsibility or liability to the owner or any other person for the family's behavior or suitability for tenancy.

1. Owner Responsibility

- (a) The owner is responsible for screening and selection of families to occupy the owner's units.

- (b) The owner is responsible for screening of families on the basis of their tenancy histories. An owner may consider a family's background with respect to such factors as:
  - (i) Payment of rent and utility bills:
  - (ii) Caring for a unit and premises:
  - (iii) Respecting the rights of other residents to the peaceful enjoyment of their housing;
  - (iv) Drug-related criminal activity or other criminal activity that is a threat to the health, safety, or property of others; and
  - (v) Compliance with other essential conditions of tenancy.

2. Providing Tenant Information to Owner

- (a) The Greensboro Housing Authority will give the owner:
  - (i) The family's current and prior address (as shown in the Greensboro Housing Authority records); and
  - (ii) The name and address (if known) of the landlord at the family's current and any prior address.
- (b) When a family wants to lease a dwelling unit, the Greensboro Housing Authority will offer the owner other information in the Greensboro Housing Authority possession about the family, including information about the tenancy history of family members or about drug trafficking and criminal activity by family members.

**28.11 Lease**

1. Tenant's Legal Capacity

The tenant must have legal capacity to enter a lease under state and local law. Legal capacity means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner.

2. Form of Lease

The tenant and the owner must enter a written lease for the unit. Both the

owner and the tenant must execute the lease.

If the owner uses a standard lease form for rental to unassisted tenants in the locality or for the premises, the lease must be in an acceptable form. If the owner does not use a standard lease form for rental to unassisted tenants, the owner may use another form of lease, such as a Greensboro Housing Authority model lease.

In all cases, the lease must include a HUD-required tenancy addendum. The tenancy addendum must include, word-for-word, all provisions required by HUD.

### 3. Required Information

The lease must specify all of the following:

- (a) The names of the owner and the tenant;
- (b) The unit rented (address, apartment number, if any, and any other information needed to identify the leased contract unit);
- (c) The term of the lease (initial term and any provision for renewal);
- (d) The amount of tenant rent to owner. The tenant rent to owner is subject to change during the term of the lease in accordance with HUD requirements;
- (e) A specification of what services, maintenance, equipment, and utilities are to be provided by the owner; and
- (f) The amount of any charges for food, furniture, or supportive services.

### 4. Initial Term of the Lease

The initial lease term must be for at least one year.

### 5. Tenancy Addendum

The tenancy addendum in the lease shall state:

- (a) The program tenancy requirements; and
- (b) The composition of the household as approved by the Greensboro Housing Authority (names of family members and any Greensboro Housing Authority live-in aide).

All provisions in the HUD-required tenancy addendum must be included in the lease. The terms of the tenancy addendum shall prevail over other provisions of the lease.

#### 6. Changes in Lease

If the tenant and the owner agree to any change in the lease, such change must be in writing and the owner must immediately give the Greensboro Housing Authority a copy of all such changes.

The owner must notify the Greensboro Housing Authority in advance of any proposed change in lease requirements governing the allocation of tenant and owner responsibilities for utilities. Such changes may be made only if approved by the Greensboro Housing Authority and in accordance with the terms of the lease relating to its amendment. The Greensboro Housing Authority will re-determine reasonable rent in accordance with Section 28.6 (A), based on any change in allocation of responsibility for

utilities between the owner and the tenant, and the re-determined reasonable rent shall be used in calculation of rent to owner from the effective date of the change.

#### 7. Lease Provisions Governing Tenant Absence from the Unit

The owner's lease may specify a maximum period of tenant absence from the unit that may be shorter than the maximum period permitted by the Greensboro Housing Authority in Section 2.3(H) of this Administrative Plan.

### **28.12 Security Deposit**

The owner may collect a security deposit from the tenant. The Greensboro Housing Authority prohibits security deposits in excess of private market practice, or in excess of amounts charged by the owner to unassisted tenants.

When the tenant moves out of the contract unit, the owner, subject to state and local law, may use the security deposit, including any interest on the deposit, in accordance with the lease, as reimbursement for any unpaid tenant rent, damages to the unit, or other amounts which the tenant owes under the lease.

The owner must give the tenant a written list of all items charged against the security deposit and the amount of each item. After deducting the amount used to reimburse the owner, the owner must promptly refund the full amount of the balance to the tenant.

If the security deposit is not sufficient to cover amounts the tenant owes under the

lease, the owner may seek to collect the balance from the tenant. The Greensboro Housing Authority has no liability or responsibility for payment of any amount owed by the family to the owner.

### **30.0 Owner Termination of Tenancy and Eviction**

1. In general, Section 16.0, Termination of the Lease and Contract, of this Administrative Plan applies with the exception that 16(A)(2)(v) (3) & (4) do not apply to the Project-based Voucher Program. In the Project-based Voucher Program “good cause” does not include a business or economic reason or desire to use the unit for an individual, family, or non-residential rental purpose. Eviction for drug and alcohol abuse applies to the Project-based Voucher Program.
2. Upon lease expiration, an owner may:
  - (a) Renew the lease;
  - (b) Refuse to renew the lease for good cause;
  - (c) Refuse to renew the lease without good cause, which case the Greensboro Housing Authority will provide the family with a tenant-based voucher and the unit will be removed from the Project-based Voucher HAP contract.

#### **30.1 Overcrowded, Under-Occupied, and Accessible Units**

1. Family Occupancy of Wrong-size or Accessible Unit

The Greensboro Housing Authority’s subsidy standards determine the appropriate unit size for the family size and composition. If the Greensboro Housing Authority determines that a family is occupying a:

- (a) Wrong-size unit, or
- (b) Unit with accessibility features that the family does not require, and the unit is needed by a family that requires the accessibility features, the Greensboro Housing Authority must promptly notify the family and the owner of this determination, and of the Greensboro Housing Authority’s offer of continued assistance in another unit pursuant to paragraph (2) of this section.

2. Greensboro Housing Authority Offer of Continue Assistance

If a family is occupying a wrong size unit, or a unit with accessibility features that the family does not require, and the unit is needed by a family that requires the accessibility features, the Greensboro Housing Authority



will offer the family the opportunity to receive continued housing assistance in another unit.

The Greensboro Housing Authority will offer the following housing options as continued assistance.

- (a) Project-based voucher assistance in an appropriate-size unit (in the same community or in another project-based voucher community);
- (b) Other housing assistance (e.g., by occupancy of a public housing unit);
- (c) Tenant-based rental assistance under the voucher program; or
- (d) Other comparable public or private tenant-based assistance (e.g., under the HOME program).

3. Greensboro Housing Authority Termination of Housing Assistance Payments

If the Greensboro Housing Authority offers the family the opportunity to receive tenant-based rental assistance under the voucher program, the Greensboro Housing Authority will terminate the housing assistance payments for a wrong-sized or accessible unit at expiration of the term of the family's voucher (including any extension granted by the Greensboro Housing Authority).

If the Greensboro Housing Authority offers the family the opportunity for another form of continued housing assistance in accordance with (2) above, and the family does not accept the offer, does not move out of the project-based voucher unit within a reasonable time as determined by the Greensboro Housing Authority, or both, the Greensboro Housing Authority will terminate the housing assistance payments for the wrong-sized or accessible unit, at the expiration of a reasonable period as determined by the Greensboro Housing Authority.

**30.2 When Occupancy May Exceed the Greater of 25 or 25 Percent Cap on the Number of Project-Based Voucher Units in Each Project**

- 1. Except as provided in Section 28.1(B)(5)(b), the Greensboro Housing Authority will not pay housing assistance under the HAP contract for contract units in excess of the PBV cap.
- 2. If referring families to the owner for admission to excepted units, the Greensboro Housing Authority will give preference to elderly or disabled families, or to families receiving supportive services.

3. A family (or the remaining members of the family) residing in an excepted unit that no longer meets the criteria for a “qualifying family” in connection with the PBV cap exception will be required to vacate the unit within a reasonable period of time established by the Greensboro Housing Authority, and the Greensboro Housing Authority will cease paying housing assistance payments on behalf of the non-qualifying family. If the family fails to vacate the unit within the established time, the unit will be removed from the HAP contract unless the project is partially assisted, and it is possible for the HAP contract to be amended to substitute a different unit in the project in accordance with Section 28.4 (E) or the owner terminates the lease and evicts the family.

### **30.3 Family Right to Move**

A family may terminate the assisted lease at any time after the first year of occupancy. The family must give the owner advance written notice of the intent to vacate, with a copy to the Greensboro Housing Authority in accordance with the lease.

If the family has elected to terminate the lease after the first year in compliance with the lease, the Greensboro Housing Authority will offer the family the opportunity for continued tenant-based rental assistance in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

*Note: Before providing notice to terminate the lease, the family must contact the Greensboro Housing Authority to request comparable tenant-based rental assistance if the family wishes to move with continued assistance. If voucher or other comparable tenant-based rental assistance is not immediately available upon termination of the family’s lease of a project-based voucher unit, the Greensboro Housing Authority will give the family priority to receive the next available opportunity for continued tenant-based rental assistance.*

If the family terminates the assisted lease before the end of one year, the family relinquishes the opportunity for continued tenant-based assistance.

The Greensboro Housing Authority and all PBV property owners will operate the property in a manner to affirmatively further fair housing. No admission preference shall intentionally discriminate against any member of a protected class. Both the Greensboro Housing Authority and all PBV property owners shall operate their properties in compliance with all Federal nondiscrimination requirements.

### **30.4 Rent to Owner**

### 30.4.1 Determining the Rent to Owner

#### 1. Initial and Redetermined Rents

- (a) The amount of the initial rent to owner is established at the beginning of the HAP contract term. For rehabilitated or newly constructed housing, the Agreement states the estimated amount of the initial rent to owner, but the actual amount of the initial rent to owner is established at the beginning of the HAP contract term.
- (b) The rent to owner is redetermined at the owner's request for a rent increase in accordance with this Section 28.6 (A) and Section 28.6 (B). The rent to owner is also redetermined at such time when there is a five percent or greater decrease in the published FMR.

#### 2. Amount of Rent to Owner

Except for certain tax credit units as provided in Section 28.6 (C), the rent to owner must not exceed the lowest of:

- (a) An amount determined by the Greensboro Housing Authority, not to exceed 110 percent of the applicable fair market rent (or any exception payment standard approved by HUD) for the unit bedroom size minus any utility allowance;
- (b) The reasonable rent; or
- (c) The rent requested by the owner.

#### 3. Rent to Owner for Certain Tax Credit Units

- (a) This section applies if:
  - (i) A contract unit receives a low-income housing tax credit under the Internal Revenue Code of 1986 (see 26 U.S.C. 42);
  - (ii) The contract unit is not located in a qualified census tract;  
  
A "qualified census tract" is any census tract (or equivalent geographic area defined by the Bureau of the Census) in which at least 50 percent of households have an income of less than 60 percent of Area Median Gross Income (AMGI) or where the poverty rate is at least 25 percent and where the census tract is designated as a qualified census tract by HUD.
  - (iii) In the same project, there are comparable tax credit units of

the same unit bedroom size as the contract unit and the comparable tax credit units do not have any form of rental assistance other than the tax credit; and

- (iv) The tax credit rent exceeds the applicable fair market rental (or any exception payment standard) as determined in accordance with Section 28.6 (B).
- (b) The rent to owner must not exceed the lowest of:
- (i) The tax credit rent minus any utility allowance;
  - (ii) The reasonable rent; or
  - (iii) The rent requested by the owner.
- (c) The “tax credit rent” is the rent charged for comparable units of the same bedroom size in the project that also receive the low-income housing tax credit but do not have any additional rental assistance (e.g., additional assistance such as tenant-based voucher assistance).

#### 4. Rent to Owner for Other Tax Credit Units

Except in the case of a tax credit unit described in the Section immediately above, the rent to owner for all other tax credit units is determined pursuant to Section 2 above.

#### 5. Reasonable Rent

The Greensboro Housing Authority will determine reasonable rent in accordance with Section 28.6 (C). The rent to owner for each contract unit may at no time exceed the reasonable rent.

#### 6. Use of FMRs and Utility Allowance Schedule in Determining the Amount of Rent to Owner

- (a) Amounts used:
- (i) Determination of Initial Rent (at the beginning of the HAP contract term)

When determining the initial rent to owner, the Greensboro Housing Authority will use the most recently published FMR in effect and the utility allowance schedule in effect at execution of the HAP contract. At its discretion, the Greensboro Housing Authority may use the amounts in

effect at any time during the 30-day period immediately before the beginning date of the HAP contract.

(ii) Redetermination of Rent to Owner

When redetermining the rent to owner, the Greensboro Housing Authority will use the most recently published FMR and the Greensboro Housing Authority utility allowance schedule in effect at the time of redetermination. At its discretion, the Greensboro Housing Authority may use the amounts in effect at any time during the 30-day period immediately before the beginning date of the HAP contract.

(b) Exception Payment Standard and Greensboro Housing Authority Utility Allowance Schedule

(i) Any HUD approved exception standard amount applies to both the tenant-based and project-based voucher programs. HUD will not approve a different exception payment standard amount for use in the project-based voucher program.

(ii) The Greensboro Housing Authority may not establish or apply different utility allowance amounts for the project-based voucher program. The same Greensboro Housing Authority utility allowance schedule applies to both the tenant-based and project-based voucher programs.

7. Greensboro Housing Authority Owned Units

For Greensboro Housing Authority owned units, the initial rent to owner and the annual re-determination of rent at the annual anniversary of the HAP contract are determined by the independent entity approved by HUD in accordance with PBV program requirements. The Greensboro Housing Authority must use the rent to owner established by the independent entity.

**30.4.2 Re-determination of Rent to Owner**

1. The Greensboro Housing Authority will re-determine the rent to owner:

(a) Upon the owner's request; or

(b) When there is a five percent or greater decrease in the published FMR.

2. Rent Increase

- (a) The Greensboro Housing Authority will not make any rent increase other than an increase in the rent to owner as outlined in 28.6(A)(1)(b) above.
- (b) The owner must request an increase in the rent to owner at the annual anniversary of the HAP contract by written notice to the Greensboro Housing Authority. The Greensboro Housing Authority must receive the written notice sixty (60) days before the annual anniversary date. The request must be submitted in the form and manner required by the Greensboro Housing Authority.
- (c) The Greensboro Housing Authority will not approve, and the owner will not receive any increase of rent to owner until and unless the owner has complied with all requirements of the HAP contract, including compliance with the HQS. The Greensboro Housing Authority will not grant any retroactive increase of rent for any period of noncompliance.

### 3. Rent Decrease

If there is a decrease in the rent to owner, the rent to owner must be decreased, regardless of whether the owner requested a rent adjustment.

### 4. Notice of Rent Determination

The Greensboro Housing Authority will give written notice of any redetermined rent. The Greensboro Housing Authority notice of the rent adjustment constitutes an amendment of the rent to owner specified in the HAP contract.

### 5. Contract Year and Annual Anniversary of the HAP Contract

- (a) The contract year is the period of 12 calendar months preceding each annual anniversary of the HAP contract during the HAP contract term. The initial contract year is calculated from the first day of the first calendar month of the HAP contract term.
- (b) The annual anniversary of the HAP contract is the first day of the first calendar month after the end of the preceding contract year. The adjusted rent to owner amount applies for the period of 12 calendar months from the annual anniversary of the HAP contract.
- (c) If contract units are placed under the HAP contract in stages commencing on different dates, there is a single annual anniversary for all contract units under the HAP contract. The annual anniversary for all contract units is the annual anniversary date for

the first contract units placed under the HAP contract. The

expiration of the HAP contract for all the contract units completed in stages must be concurrent with the end of the HAP contract term for the units originally placed under HAP contract.

### **30.4.3 Reasonable Rent**

#### **1. Comparability Requirement**

At all times during the term of the HAP contract, the rent to owner may not exceed the reasonable rent as determined by the Greensboro Housing Authority.

#### **2. Redetermination**

The Greensboro Housing Authority will redetermine the reasonable rent under the following circumstances:

- (a) Whenever there is a five percent or greater decrease in the published FMR in effect sixty (60) days before the contract anniversary (for the unit sizes specified in the HAP contract) as compared with the FMR in effect one year before the contract anniversary;
- (b) Whenever the Greensboro Housing Authority approves a change in the allocation of responsibility for utilities between the owner and the tenant;
- (c) Whenever the HAP contract is amended to substitute a different contract unit in the same project; and
- (d) Whenever there is any other change that may substantially affect the reasonable rent.

#### **3. How to Determine Reasonable Rent**

The reasonable rent of a contract unit must be determined by comparison to rent for other comparable unassisted units. In determining the reasonable rent, the Greensboro Housing Authority will consider factors that affect market rent, such as:

- (a) The location, quality, size, unit type, and age of the contract unit; and
- (b) Amenities, housing services, maintenance, and utilities to be provided by the owner.

#### **4. Comparability Analysis**

- (a) For each unit, the Greensboro Housing Authority comparability analysis will use at least three comparable units in the private unassisted market,

which may include comparable unassisted units in the premises or project.

- (b) The Greensboro Housing Authority will retain a comparability analysis that shows how the reasonable rent was determined, including major differences between the unassisted units.
- (c) The comparability analysis may be performed by the Greensboro Housing Authority staff or by another qualified person or entity. A person or entity that conducts the comparability analysis and any Greensboro Housing Authority staff or contractor engaged in determining the housing assistance payment based on the comparability analysis may not have any direct or indirect interest in the property.

5. Owner Certification of Comparability

By accepting each monthly housing assistance payment from the Greensboro Housing Authority, the owner certifies that the rent to owner is not more than rent charged by the owner for comparable unassisted units in the premises. The owner must give the Greensboro Housing Authority information requested by the Greensboro Housing Authority on rents charged by the owner for other units in the premises or elsewhere.

6. Determining Reasonable Rent for Greensboro Housing Authority Units

For Greensboro Housing Authority units, the amount of the reasonable rent must be determined by an independent agency approved by HUD in accordance with PBV program requirements, rather than by Greensboro Housing Authority staff. Reasonable rent must be determined in accordance with this Section.

The independent entity must furnish a copy of the independent entity determination of reasonable rent for Greensboro Housing Authority owned units to the Greensboro Housing Authority and to the HUD field office where the project is located.

7. Other Subsidy; Effect on Rent to Owner

In addition to the rent limits established in accordance with 28.5(A)&(B), the following restrictions apply to certain units:

- (a) HOME – for units assisted under the HOME program, rents may not exceed rent limits as required by the HOME program.
- (b) Subsidized Projects

This paragraph applies to any contract units in any of the following types of federally subsidized project:



- (i) An insured or non-insured Section 236 project;
- (ii) A formerly insured or non-insured Section 236 project that continues to receive Interest Reduction Payment following a decoupling action;
- (iii) A Section 221(d)(3) below market interest rate (BMIR) project;
- (iv) A Section 515 project of the Rural Housing Service;
- (v) A project receiving low-income housing tax credits;
- (vi) Any other type of federally subsidized project specified by HUD.

The rent to owner may not exceed the subsidized rent (basic rent) or tax credit rent as determined in accordance with requirements for the applicable federal program.

(c) Combining Subsidy

Rent to owner may not exceed any limitation required to comply with HUD subsidy layering requirements.

(d) Other Subsidy: Greensboro Housing Authority Discretion to Reduce Rent

The Greensboro Housing Authority, at its discretion, may reduce the initial rent to owner because of other governmental subsidies, including tax credit or tax exemption, grants, or other subsidized financing.

(e) Prohibition of Other Subsidy

The Greensboro Housing Authority will not attach or pay Project-based Voucher assistance to units in any of the following types of subsidized housing:

- (i) A public housing dwelling unit;
- (ii) A unit subsidized with any other form of HCVP assistance (tenant-based or project-based);
- (iii) A unit subsidized with any governmental rent subsidy (a subsidy that pays all or any part of the rent);
- (iv) A unit subsidized with any governmental subsidy that covers all or any part of the operating costs of the housing;

- (v) A unit subsidized with Section 236 rental assistance payments (12 U.S.C. 1715z-1). However, the Greensboro Housing Authority may attach assistance to a unit subsidized with Section 236 interest reduction payments;
- (vi) A unit subsidized with rental assistance payments under Section 521 of the Housing Act of 1949, 42 U.S.C. 1490a (a Rural Housing Service Program). However, the Greensboro Housing Authority may attach assistance for a unit subsidized with Section 515 interest reduction payments (42 U.S.C. 1485);
- (vii) A Section 202 project for non-elderly persons with disabilities (assistance under Section 162 of the Housing and Community Development Act of 1987, 12 U.S.C. 1701q note);
- (viii) Section 811 project based supportive housing for persons with disabilities (42 U.S.C. 8013);
- (ix) Section 202 supportive housing for the elderly (12 U.S.C. 1701q);
- (x) A Section 101 rent supplement project (12 U.S.C. 1701s);
- (xi) A unit subsidized with any form of tenant-based rental assistance (as defined at 24 CFR 982.1(b)(2)) (e.g., a unit subsidized with tenant-based rental assistance under the HOME program, 42 U.S.C. 12701 et seq.);
- (xii) A unit with any other duplicative federal, state, or local housing subsidy, as determined by HUD or by the Greensboro Housing Authority in accordance with HUD requirements. For this purpose, “housing subsidy” does not include the housing component of a welfare payment; a social security payment; or a federal, state, or local tax concession (such as relief from local real property taxes).

8. Rent to Owner: Effect of Rent Control and Other Rent Limits

In addition to all the above limitations on the rent paid to the owner, if a state or local rent control requirement exists, it will apply to the property.

## ***40.0 PAYMENT TO OWNER***

### **40.1 Greensboro Housing Authority Payment to Owner for Occupied Unit**

1. When Payments Are made

The Greensboro Housing Authority will make housing assistance payments to the owner in accordance with the terms of the HAP contract.

Except for discretionary vacancy payments in accordance with 28.7(B) below, the Greensboro Housing Authority will not make any housing assistance payment to the owner for any month after the month when the family moves out of the unit (even if household goods or property are left in the unit).

2. Monthly Payment

Monthly, the Greensboro Housing Authority will make a housing assistance payment to the owner for each contract unit that is in compliance with HQS and is leased to and occupied by an eligible family in accordance with the HAP contract.

3. Calculating Amount of Payment

The monthly housing assistance payment by the Greensboro Housing Authority to the owner for a contract unit leased to a family is the rent to owner minus the tenant rent (total tenant payment minus the utility allowance).

4. Prompt Payment

The Greensboro Housing Authority will make the housing assistance payment to the owner under the HAP contract on or about the first day of the month for which payment is due, unless the owner and the Greensboro Housing Authority agree on a later date. If such an agreement has been made, it must be in writing.

5. Owner Compliance with Contract

In order to receive housing assistance payments in accordance with the HAP contract, the owner must be in compliance with all the provisions of the HAP contract. Unless the owner complies with all the provision of the HAP contract, the owner does not have a right to receive housing assistance payments.

#### **40.1.1 Vacancy Payment**

1. Payment for Move-Out Month

If an assisted family moves out of the unit, the owner may keep the housing assistance payment payable for the calendar month when the family moves out (“move-out month”). If the Greensboro Housing Authority determines

that the vacancy is the owner's fault, the owner may not keep the payment.

## 2. Vacancy Payment

The Greensboro Housing Authority will determine the vacancy payment to the owner for each month of the maximum two-month period. The maximum two-month period is determined from the beginning of the first calendar month after the move-out month for a period not exceeding two full months following the move out month.

The vacancy payment cannot exceed the monthly rent to owner under the assisted lease, minus any portion of the rental payment received by the owner (including amounts available from the tenant's security deposit). The Greensboro Housing Authority will only allow a vacancy payment for the period the unit remains vacant.

The Greensboro Housing Authority will make vacancy payment to the owner only if:

- (a) The owner gives the Greensboro Housing Authority prompt written notice certifying that the family has vacated the unit. The written notice must contain the date when the family moved out (to the best of the owner's knowledge and belief);
- (b) The owner certifies that the vacancy is not the fault of the owner and that the unit was vacant during the period for which payment is claimed;
- (c) The owner certifies that it has taken every reasonable action to minimize the likelihood and length of the vacancy; and
- (d) The owner provides any additional information required and requested by the Greensboro Housing Authority to verify that the owner is entitled to the vacancy payment.

The owner must submit a request for vacancy payments in the following manner:

The Greensboro Housing Authority requires vacancy payment requests to be submitted to the Housing Authority on the Request for Vacancy Payment form by the 20<sup>th</sup> of the month for processing for the 1<sup>st</sup> of the next month. If the owner fails to meet this deadline, the payment will be process by the first of the following month.

### **40.1.2 Tenant Rent; Payment to Owner**

1. Greensboro Housing Authority Determination

The Greensboro Housing Authority will determine the tenant rent and effective dates of changes in rent in accordance with this HCVP Administrative Plan. The tenant rent is the portion of the rent to owner paid by the family.

2. Tenant Payment to Owner

The family is responsible for paying the tenant rent (total tenant payment minus the utility allowance). The tenant rent is determined by the Greensboro Housing Authority and is the maximum amount the owner can charge the family for rent of a contract unit.

The tenant rent is payment for all housing services, maintenance, equipment, and utilities to be provided by the owner without additional charge to the tenant, in accordance with the HAP contract and lease.

The owner cannot demand or accept any rent payment from the tenant in excess of the tenant rent. The owner is required to immediately return any excess payment to the tenant.

3. Limit of Greensboro Housing Authority Responsibility

The Greensboro Housing Authority is responsible only for making housing assistance payments to the owner on behalf of a family in accordance with the HAP contract. The Greensboro Housing Authority is not responsible for paying the tenant rent, or for paying any other claim by the owner.

4. Utility Reimbursement

If the amount of the utility allowance exceeds the total tenant payment, the Greensboro Housing Authority will pay the amount of such excess as a reimbursement for tenant-paid utilities and the tenant rent to the owner shall be zero.

### **40.1.3 Other Fees and Charges**

1. Meals and Supportive Services

In assisted living developments receiving project-based assistance, owners may charge tenants, family members, or both for meals or supportive services. These charges will not be included in the rent to owner, nor will the value of meals and supportive services be included in the calculation of

reasonable rent. Non-payment of such charges is grounds for termination of the lease by the owner in an assisted living development.

For any other type of project-based assistance (other than assisted living) the owner may not require the tenant or family members to pay charges for meals or supportive services. Non-payment of such charges is not grounds for termination of tenancy.

## 2. Other Charges by Owner

The owner may not charge the tenant or family members extra amounts for items customarily included in rent in the locality or provided at no additional cost to unsubsidized tenants in the premise.

# **41.0 VIOLENCE AGAINST WOMEN ACT**

## ***41.1 VAWA PROTECTIONS***

VAWA protections cover tenants and assisted families, as defined under applicable program regulations. VAWA protections also cover applicants when they are applying for admission to a covered housing program. VAWA protections are not limited to women. Victims of domestic violence, dating violence, sexual assault, or stalking are eligible for protections without regard to sex, gender identity, or sexual orientation. Victims cannot be discriminated against the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age, and HUD programs must also be operated consistently with HUD's Equal Access Rule, which requires that HUD-assisted and HUD-insured housing are made available to all otherwise eligible individuals and families regardless of actual or perceived sexual orientation, gender identity, or marital status. GHA may find instances of domestic violence, dating violence, sexual assault, or stalking against youth (those under the age of 18 years old) living in an assisted household for which the family may need to exercise VAWA protections to protect the youth victim. GHA will exercise the same documentation and confidentiality procedures in assisting a family in this situation.

41.1.1 An incident or incidents or actual or threatened domestic violence, dating violence, sexual assault, or stalking will not be construed as a serious or repeated violation of the lease by the victim or threatened victim of that violence, and shall not in itself be good cause for terminating the assistance, tenancy, or occupancy rights of the victim of such violence by either the Greensboro Housing Authority or the owner or property manager.

41.1.2 The Greensboro Housing Authority shall provide each applicant and participant a HUD prescribed Notice of Occupancy Rights and Certification form. It shall also be provided with any notice of eviction. In addition, the Authority shall make an adopted Emergency Transfer Plan and Emergency Transfer Request available upon

request.

- 41.1.3 The Greensboro Housing Authority shall keep a record of all emergency transfer requests requested under the Emergency Transfer Plan and the outcome of these requests for three years.
- 41.1.4 GHA may terminate the assistance to remove a lawful occupant or tenant who engages in criminal acts or threatened acts of violence, dating violence, sexual assault, or stalking to affiliated individuals or others without terminating the assistance or evicting victimized lawful occupants. Also, the owner or property manager may evict a lawful occupant or tenant who engages in criminal acts or threatened acts of violence, sexual assault, or stalking to family members or affiliated individuals without evicting other victimized lawful occupants. This is also true even if the household member or affiliated individual is not a signatory to the lease. Under VAWA, both the Greensboro Housing Authority and the owner or property manager are granted the authority to bifurcate the lease. The VAWA victim must be the one who retains the assistance. If such bifurcation occurs and removed tenant or lawful occupant was the sole tenant eligible to receive assistance under the covered housing program, Greensboro Housing Authority will provide any remaining tenant the opportunity to establish eligibility for the covered housing program. If the remaining tenant cannot establish eligibility, Greensboro Housing Authority will provide the tenant 30 days to find new housing or establish eligibility under another covered housing program.
- 41.1.5 GHA and owner or property manager may honor court orders regarding the rights of access or control of the property.
- 41.1.6 There is no limitation on the ability of GHA to terminate assistance for other good cause unrelated to the incident or incidents of domestic violence, dating violence, sexual assault, or stalking, other than the victim may not be subject to a “more demanding standard” than non-victims. Likewise, an owner or property manager can evict for good cause unrelated to the incident or incidents of domestic violence, dating violence, sexual assault, or stalking. This is provided that neither subject such a tenant to a more demanding standard than other tenants in making the determination whether to evict, or to terminate assistance or occupancy rights.
- 41.1.7 There is no prohibition on the owner evicting if it “can demonstrate an actual and imminent threat to other tenants or those employed at or providing goods or services to the property if that tenant’s (victim’s) tenancy is not terminated.” An actual and imminent threat consists of a physical danger that is real, would occur within an immediate timeframe, and could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include: the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur.
- 41.1.8 Any protections provided by law which give greater protection to the victim are not superseded by these provisions.

## **41.2 VERIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING**

The Greensboro Housing Authority shall require, and the owner or property manager may require verification in all cases where an individual claims protection under VAWA against an action involving such individual proposed to be taken by GHA.

41.2.1 **Requirement for Verification.** The law allows, but does not require, the Greensboro Housing Authority or a Section 8 owner or property manager to verify that an incident or incidents of actual or threatened domestic violence, dating violence, sexual assault, or stalking claimed by a tenant or other lawful occupant is bona fide and meets the requirements of the applicable definitions set forth in this policy. GHA will require verification in all cases where an individual claims protection against an action involving such individual proposed to be taken by the GHA. Section 8 owners or managers receiving rental assistance administered by GHA may elect to require verification, or not to require it as permitted under applicable law.

Verification of a claimed incident or incidents of actual or threatened domestic violence, dating violence, sexual assault, or stalking may be accomplished in one of the following three ways:

41.2.1.1 **HUD-approved form** - By providing to GHA or to the requesting Section 8 owner or property manager a written certification, on the form approved by the U.S. Department of Housing and Urban Development (HUD), that the individual is a victim of domestic violence, dating violence, sexual assault, or stalking that the incident or incidents in question are bona fide incidents of actual or threatened abuse meeting the requirements of the applicable definition(s) set forth in this policy. The incident or incidents in question must be described in reasonable detail as required in the HUD-approved form, and the completed certification must include the name of the perpetrator, only if the name of the perpetrator is safe to provide and is known to the victim.

41.2.1.2 **Other documentation** - by providing to GHA or to the requesting Section 8 owner or property manager documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional, from whom the victim has sought assistance in addressing the domestic violence, dating violence, sexual assault, or stalking, or the effects of the abuse, described in such documentation. The professional providing the documentation must sign and attest under penalty of perjury



(28 U.S.C. 1746) to the professional's belief that the incident or incidents in question are bona fide incidents of abuse meeting the requirements of the applicable definition(s) set forth in this policy. The victim of the incident or incidents of domestic violence, dating violence, sexual assault, or stalking described in the documentation must also sign and attest to the documentation under penalty of perjury.

41.2.1.3 ***Police or court record*** – by providing to GHA or to the requesting Section 8 owner or property manager a Federal, State, tribal, territorial, or local law enforcement or court record describing the incident or incidents in question.

41.2.1.4 ***Other documentation*** – A document signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional or a mental health professional (collectively, professional) from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse: 2) signed by the applicant or tenant; and 3) That specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection and remedies under the VAWA Final Rule, and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault, or stalking under 24 CFR 5.203; or A record of a federal, State, tribal, territorial or local law enforcement agency (may include a police report, court, or administrative agency; or At the discretion of a covered housing provider, a statement or other evidence provided by the applicant or tenant.

41.2.2 ***Time allowed to provide verification/failure to provide.*** An individual who claims protection against adverse action based on an incident or incidents of actual or threatened domestic violence, dating violence, sexual assault, or stalking, and who is requested by GHA, or a Section 8 owner or property manager to provide verification, must provide such verification within 14 business days after receipt of the written request for verification. Failure to provide verification, in proper form within such time will result in loss of protection under VAWA and this policy against a proposed adverse action. The submission of false information may be the

basis for the termination of assistance or for eviction.

41.2.3 ***Managing conflicting documentation.*** In cases where the Greensboro Housing Authority receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the Greensboro Housing Authority may determine which is the true victim by requiring third-party documentation as described in 24 CFR 5.2007 and in accordance with any HUD guidance as to how such determinations will be made. GHA shall honor any court orders addressing rights of access or control of the property, including civil protection orders issued to protect the victim and issued to address the distribution or possession of property among the household.

### **41.3 CONFIDENTIALITY**

All information provided under VAWA including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking, shall be retained in confidence and shall not be entered into any shared database or provided to any related entity except to the extent that the disclosure is:

41.3.1 Requested or consented to by the individual in writing;

41.3.2 Required for use in an eviction proceeding; or

41.3.3 Otherwise required by applicable law.

An emergency transfer to another available and safe dwelling under a covered housing program may be available to a tenant if the tenant requests a transfer, and either the tenant reasonably believes he or she is threatened with imminent harm from further violence if he or she remains in the unit or, if the tenant is a sexual assault victim, and the sexual assault occurred on the premises during the 90-day period preceding the transfer request.

The Greensboro Housing Authority shall provide its participants notice of their rights under VAWA including their right to confidentiality and the limits thereof.

## **42.0 RENTAL ASSISTANCE DEMONSTRATION (RAD)**

### **PBV Conversions Under RAD**

(Chapter 28 outlines GHA's PBV policies. Exceptions to the PBV policies related to RAD are discussed in Chapter 30)

### **42.1 INTRODUCTION**

RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Pub. L. No. 112-55, approved November 18, 2011), as amended by the Consolidated Appropriations Act, 2014 (Pub. L. No. 113-76, approved January 17, 2014), the Consolidated and Further Continuing Appropriations Act, 2015 (Pub. L. No. 113-235, approved December 16, 2014), the Consolidated Appropriations Act, 2016 (Pub. L. No. 114-113, approved December 18, 2015), the Consolidated Appropriations Act, 2017 (Pub. L. No. 115-31, approved May 5, 2017), and section 237 of Title II, Division L, Transportation, Housing and Urban Development, and Related Agencies, of the

Consolidated Appropriations Act, 2018 (Pub. L. 115-141, approved March 23, 2018) collectively, the “RAD Statute.” RAD has two separate components. The Rental Demonstration allows projects funded under the public housing and Section 8 Moderate Rehabilitation (Mod Rehab) programs to convert their assistance to long-term, project-based Section 8 rental assistance contracts. Under this component of RAD, public housing agencies (PHAs) and Mod Rehab owners may choose between two forms of Section 8 Housing Assistance Payment (HAP) contracts: project-based vouchers (PBVs) or project-based rental assistance (PBRA). RAD provides the opportunity to test the conversion of public housing and other HUD-assisted properties to long-term, project-based Section 8 rental assistance to achieve certain goals, including the preservation and improvement of these properties through enabling access by PHAs and owners to private debt and equity to address immediate and long-term capital needs. RAD is also designed to test the extent to which residents have increased housing choices after the conversion, and the overall impact on the subject properties.

#### **42.2 *PBV CONVERSIONS***

PHAs will apply competitively to convert assistance of projects in accordance with the terms of this Notice. Under this component of RAD, PHAs may choose between two forms of Section 8 Housing Assistance Payment (HAP) contracts: project-based vouchers (PBVs) or project-based rental assistance (PBRA). No incremental funds are authorized for this component. PHAs will convert their assistance at current subsidy levels, subject to applicable program rent caps. Applications must be submitted for specific projects. Following review and selection of application, HUD will provide the PHA with a Commitment to enter into a Housing Assistance Payment (CHAP), following which the PHA will have to present a Financing Plan for HUD to approve. After HUD approval of the long-term viability of the Financing Plan and successful closing of the conversion, the project will receive a long-term Section 8 HAP contract. Upon conversion, RAD PBV communities (covered projects) will be removed from the public housing program and will be released from the public housing Declaration of Trust (DOT). Where the PHA converts assistance of a public housing project to Section 8 PBVs, the project will be administered by the agency on whose Annual Contributions Contract (ACC) the vouchers are assigned (which in many cases will be the same agency that is converting assistance). PBV contract rents will be equal to the project’s current funding, subject to a cap, and will be adjusted annually by an operating cost factor at each anniversary of the HAP contract, subject to the availability of appropriations for each year of the contract term. Each project with a PBV contract will also carry a concurrent renewable RAD Use Agreement.

#### **42.3 *PBV PROJECT SELECTION***

##### **A. Maximum Amount of PBV Assistance**

RAD PBV communities do not count against the maximum amount of assistance a PHA may utilize for the PBV program, which is currently set at 20 percent of the amount of budget authority allocated to a PHA under the Housing Choice Voucher program. To implement this provision, HUD is waiving this section.

## B. Waiver of PBV Rules

Under the Demonstration, the provisions governing the maximum amount of HCV assistance that may be project-based, do not apply to properties converting their assistance under RAD. Therefore, HUD is waiving the associated requirements concerning the maximum amount of PBV assistance. Accordingly, selections under RAD do not count against the 20 percent limitation on the maximum amount of assistance a PHA may utilize for the PBV program.

In addition, HUD has the authority to waive or alter the provisions governing the cap on the number of PBV units in each building and goals of deconcentrating poverty and expanding housing and economic opportunities, respectively. Accordingly, for properties converting their assistance under RAD, HUD is making the following changes to the regulations implementing these four statutory provisions:

- **Cap on the Number of PBV Units in Each Project.** The 25 percent limitation on the number of units that may receive PBV assistance in a project is increased to 50 percent for RAD PBV.

An assisted household cannot be involuntarily displaced as a result of this provision.

GHA may elect to provide up to 50% of RAD PBV assistance in a PBV community.

- An owner may still project-base 100 percent of the units provided at least 50 percent of the units at the project qualify for the exceptions for elderly, disabled, or families receiving supportive services, or are within single-family properties. Exceptions are noted below.

**Supportive Services Exceptions.** For purposes of RAD, the requirement that a family must actually receive services to reside in the

excepted unit has been modified. Families living in units subject to a proposed RAD conversion must be given the option to receive supportive services. If such services are declined by the household, the RAD PBV unit shall remain under the HAP contract, the household shall not be terminated from the PBV Program, and the decision to decline an offer to receive supportive services shall not represent a ground for lease termination. Once the initial household residing in the excepted unit under RAD vacates such unit, all PBV program requirements related to the required receipt of supportive services shall apply in accordance with 24 CFR §§ 983.56, 983.257(c), 983.261(a) and (d).

To implement these provisions, HUD is waiving appropriate sections and related provisions of the Act for initial occupancy in the RAD converted project.

The GHA may elect to include supportive housing in its RAD PBV contract. It may also elect to allocate the entire 50 percent of the capped Voucher assistance for the supportive housing units. A third-party organization may provide the supportive services.

- Owner Proposal Selection Procedures. Selections of RAD PBV communities shall be made in accordance with program requirements. To implement this provision, HUD has waived the owner proposal selection procedures as outlined in the RAD regulations.
- Site selection. HUD waives compliance with PBV Goals and the provisions thereof, including deconcentration of poverty and expanding housing and economic opportunity for the existing site.

#### ***42.4 PBV CONTRACT TERMS***

##### ***A. LENGTH OF CONTRACT***

HCV PBV has a maximum HAP contract term of 15 years. RAD PBV projects shall have an initial HAP term of *at least* 15 years and up to a *maximum* of 20 years upon request of the PHA and with approval by the agency administering the vouchers. Owners of RAD PBV communities are required to make available for occupancy by eligible tenants the number of assisted units under the terms of the contract and may not reduce the number of assisted units without HUD approval. Any HUD approval of a PHA's request to reduce the number of assisted units under the contract shall be subject to conditions that HUD may impose.

The GHA may enter into PBV Contracts with a minimum term of 15 years and a maximum term of up to 20 years.

##### ***B. MANDATORY CONTRACT RENEWAL***

By statute, upon contract expiration, the agency administering the vouchers shall offer, and the PHA shall accept, renewal of the contract subject to the terms and conditions applicable at the time of renewal and the availability of appropriations each year for such renewal.

##### ***C. RAD USE AGREEMENT***

Pursuant to the RAD statute, covered projects shall have an initial RAD Use

Agreement that:

- a) Will be recorded superior to other liens on the property;
- b) Will run for the same term as the initial HAP contract, automatically renew upon extension or renewal of the HAP contract for a term that runs with the renewal term of the HAP contract, and remain in effect even in the case of abatement or termination of the HAP contract (for the term the HAP contract would have run, absent the abatement or termination), unless the Secretary provides approval for the RAD Use Agreement to be terminated when an owner requests a transfer of assistance;
- c) Requires that in the event that the HAP contract is removed due to breach, non-compliance or insufficiency of Appropriations, for all units previously covered under the HAP contract, new tenants must have incomes at or below 80 percent of the area median income (AMI) at the time of admission and rents may not exceed 30% of 80% of median income for an appropriate size unit for the remainder of the term of the RAD Use Agreement; and
- d) Requires compliance with all applicable fair housing and civil rights requirements, including the obligation to affirmatively further fair housing and all applicable site selection and neighborhood standards requirements.

#### ***D. INITIAL CONTRACT RENTSETTING***

Pursuant to the RAD statute, the statutory and regulatory PBV requirements governing contract rents will apply, except that rents cannot exceed “current funding”.

Initial contract rents cannot exceed the lessor of:

- a) Current funding (adjusted for bedroom size);
- b) The reasonable rent as defined in Chapter 11 of this Administrative Plan;
- c) Up to 110 percent of the applicable FMR (or applicable exception payment standard), minus any utility allowance; or
- d) The rent requested by the owner.

#### ***43.0 METHOD OF ADJUSTING CONTRACT RENTS***

Contract rents will be adjusted annually by HUD’s Operating Cost Adjustment Factor (OCAF) at each anniversary of the HAP contract, subject to the availability of appropriations for each year of the contract term. As such, section 8(o)(13)(I) of the Act and 24 CFR §§ 983.301 and 983.302, concerning rent determinations, shall not apply when adjusting rents. The rent to owner may at no time exceed the reasonable rent charged for comparable unassisted units in private market, as determined by the Contract Administrator in accordance 24 CFR § 983.303.

However, the rent to owner shall not be reduced below the initial rent to owner for

dwelling units under the initial HAP contract.

The GHA will apply the HUD *Operating Cost Adjustment Factor* (OCAF) at each anniversary of the HAP contract. The GHA will conduct a rent reasonable test to ensure the rent to the owner does not exceed the reasonable rent charged for comparable unassisted units in the private market. The GHA shall not reduce the rent to an amount lower than what was outlined in the initial HAP contract, except under the following conditions:

- a. To correct errors in calculation in accordance with HUD requirements;
- b. If additional assistance is required pursuant to CFR § 983.55 (prohibition of excess public assistance)
- c. If a decrease in rent to owner is required based on changes in the allocation of responsibility for utilities between the owner and the tenant.

#### ***A. AHAP CONTRACT AGREEMENT WAIVER***

For public housing conversions to PBV, there will be no AHAP (Agreement to Enter into a Housing Assistance Payments Contract). Therefore, all regulatory references to the Agreement (AHAP) are waived.

#### ***43.1 PBV RESIDENT RIGHTS AND PARTICIPATION***

##### ***NO RE-SCREENING OF TENANTS UPON CONVERSION***

Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.

#### ***43.2 RIGHT TO RETURN***

Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation of construction is completed.

#### ***A. RENEWAL OF LEASE.***

Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.

### ***B. PHASE-IN OF TENANT RENT INCREASES***

If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

**GHA Policy:** If the tenant's monthly rent increases more than 10% or \$25 whichever is greater, a three (3) year phase-in will be implemented according to the Three-Year Phase-in scheduled below.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of the section "standard TTP" refers to the TTP calculated in accordance with regulations at 24 CFR § 5.628 and the

"most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion-33% of difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and all subsequent recertification full standard TTP

*Please Note:* In the three-year phase-in once the standard TTP is equal to or less than the previous TTP, the phase-in ends, and tenants will pay full TTP from the point forward.



#### ***44.0 PUBLIC HOUSING FAMILY SELF SUFFICIENCY (PH FSS) AND RESIDENT OPPORTUNITIES AND SELF SUFFICIENCY SERVICE COORDINATOR (ROSS- SC) PROGRAMS***

Current PH FSS participants will continue to be eligible for FSS once their housing is converted to RAD, and PHAs will be allowed to use any PH FSS funds granted previously or pursuant to the FY 2013 PH FSS NOFA, to serve those FSS participants who live in units converted by RAD and who will as a result be moving to the HCV FSS program, subject to the following:

- A. If a PHA has an HCV FSS program, a PHA must convert the PH FSS program participants at the covered project to their HCV FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.
- If a PHA does not have an HCV FSS program, the PHA must establish an HCV FSS program and convert the PH FSS program participants at the covered project into their HCV FSS program. PHAs are not required to offer enrollment in FSS to residents in converting projects and other HCV participants, other than to residents in converting projects that were enrolled in the PH FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

GHA has an HCV FSS program therefore any PH FSS program participant in a unit that is converted under RAD will be transferred to the GHA HCV FSS program without loss of accumulated escrow.

All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984 and in accordance with the participants' contracts of participation.

#### ***45.0 RESIDENT FUNDING AND PARTICIPATION***

In accordance with Attachment 1B of PIH Notice 2012-32, REV-1, residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

##### ***A. RESIDENT PROCEDURAL RIGHTS***

The following items must be incorporated into the owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

- B. Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public

housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, as modified by the waiver in PIH Notice 2012-32, REV-1, Section 1.6(C)(3) above, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:

- a. A reasonable period of time, but not to exceed 30 days:
  - If the health or safe of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatening; or
  - In the event of any drug-related or violent criminal activity or any felony conviction.
- b. 14 days in the case of non-payment of rent; and
- c. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

## **46.0 Grievance Process**

HUD is incorporating additional procedural rights to comply with the requirements of termination. For issues related to tenancy and termination of assistance, PBV program rules require the PHA to provide an opportunity for an informal hearing. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:

- In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi),<sup>[2]</sup> an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a PHA (as owner) action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
- For any hearing required per regulation, the contract administrator will perform the hearing, as is the current standard in the program.
- For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.

- An informal hearing will not be required for class grievances or to disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement shall not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.
- The PHA (as owner) gives residents notice of their ability to request an informal hearing (per regulations) that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-vi).
- The PHA (as owner) provides opportunity for an informal hearing before an eviction.

The hearing procedures for PBV and PBV clients converted under RAD clients are outlined in Chapter 15 of the GHA HCV Administrative Plan.

### ***EARNED INCOME DISREGARD (EID)***

Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617.

Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at the time.

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only applied to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc., is covered by this waiver.

## ***46.1 WAITING LIST***

### ***A. ESTABLISHING THE WAITLIST***

In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list

for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list in accordance 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the converted project's initial waiting list. For the purpose of establishing the initial waiting list, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing waiting list given the number of applicants, PHA resources, and community characteristics of the proposed conversion under RAD. Such activities should be pursuant to the PHA's policies for waiting list management, including the obligation to affirmatively further fair housing.

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency's centralized public housing waiting list who wish to be placed onto the newly-established waiting list are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for person with limited English proficiency (LEP). To implement this provision, HUD is waiving 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

GHA will use the current public housing centralized waiting list to establish site-based waiting lists for each PBV development or a centralized PBV waiting list.

## ***47.0 CHOICE MOBILITY***

HUD seeks to provide all residents of covered projects with viable Choice Mobility options. PHAs that are applying to convert the assistance of a project to PBV are required to provide a Choice Mobility option to residents of covered projects. Residents have a right to apply for tenant-based rental assistance the latter of:

-12 months from date of execution of the HAP Contract or

-12 months after the move-in date and can request to be placed on the choice mobility waiting list receive first priority on the HCV waiting list.

The Greensboro Housing Authority will not provide more than three-quarters of its turnover vouchers in any single year to the residents of its project-based voucher communities.

## **48.0 BED BUG POLICY FOR TENANT-BASED VOUCHERS**

Bed bugs are a growing national problem, and as a result, this policy has been created for the Housing Choice Voucher program. The purpose of this policy is to set forth the roles and responsibilities of all parties (GHA, Tenant, and Landlord) in minimizing the potential for bed bugs. The policy will also provide guidance in cases where bed bugs are present in order to eliminate them as quickly as possible.

Bed bugs are difficult to contain without the proper treatment. Therefore, it is imperative that all parties (GHA, Tenant, and Landlord) work simultaneously toward a common goal, extermination and elimination. Left untreated bed bugs can spread throughout a residence affecting current and future tenants.

### ***48.1 LANDLORD ROLES AND RESPONSIBILITIES***

The Housing Assistance Payment (HAP) contract requires the landlord to maintain the contract unit and its premises in accordance with Housing Quality Standards (HQS). If bed bugs are present, it is the responsibility of the landlord, as stated in the HQS (CFR 982.401), to ensure that the dwelling unit and its equipment be in sanitary condition and free of vermin and rodent infestation. In order to comply with the HQS, if the presence of bed bugs is suspected, the landlord must notify GHA immediately and it is strongly recommended that the landlord contact an extermination professional for an immediate inspection. If treatment is deemed necessary, a copy of the contract the landlord entered into with the extermination professional (including all treatment performed) must be provided to GHA by the landlord within 48 hours of initial determination that treatment is required. In addition, the landlord must complete the “Landlord Certification Statement” document and send to GHA within 72 hours of the initial determination that treatment is required.

Failure to comply with the above requirements is a direct violation of the HAP contract and may result in abatement, suspension or termination of housing assistance payments, termination of the HAP contract, and suspension of eligibility to participate in the Housing Choice Voucher program.

#### ***A. TENANT ROLES AND RESPONSIBILITIES***

The HAP contract requires the tenant to keep the unit and its premises free from damage. Therefore, if the presence of bed bugs is suspected, it is the tenant’s responsibility to notify the landlord and GHA immediately in order to minimize any potential damage to the unit. In addition, it is the responsibility of the tenant to work cooperatively with the landlord and/or extermination professional to ensure the successful elimination of bed bugs. Tenant

non-compliance may result in the loss of their Housing Choice Voucher.

If the tenant notifies the landlord of the presence of bed bugs and the landlord fails to take action within a reasonable period of time, the tenant should notify GHA. GHA will assist the tenant in relocation if it is deemed necessary and appropriate.

#### ***48.2 BEDBUG POLICY FOR PROJECT-BASED VOUCHERS***

The Greensboro Housing Authority recognizes the potential problems that can arise out of bedbug infestations in public housing. Accordingly, the Greensboro Housing Authority adopts this policy in an effort to minimize bedbug infestations in its public housing, Housing Choice Voucher Program, and other owned affordable housing.

##### ***A. HOUSING AUTHORITY'S RESPONSIBILITIES***

The Greensboro Housing Authority shall provide training to appropriate staff members regarding the identification, prevention, and eradication of bedbugs.

The Greensboro Housing Authority shall make efforts to educate new and existing residents on methods that may be utilized in order to prevent and detect bedbugs. Such efforts may include written handouts distributed to all residents and public workshops for residents to attend (See sample handout attached to this policy).

The Greensboro Housing Authority will keep a qualified pest control company under contract so they can be called on an "as needed" basis if internal staff is inadequate to deal with a bedbug infestation.

The Greensboro Housing Authority shall keep written records of reports and incidents of bedbug infestation. Said records shall identify the dates, times and places of such reports or incidents.

#### ***48.2 INSPECTION OF UNIT***

If a resident reports the existence of bedbugs in his or her unit, the Greensboro Housing Authority shall within 24 hours make contact with the resident, provide the resident with information about control and prevention of bedbugs and discuss measures the resident may be able to take in the unit before an inspection is performed.

Following a report of bedbugs, the Greensboro Housing Authority or a qualified third party trained in bedbug detection shall inspect the dwelling unit to determine if bedbugs are present. It is critical that inspections be conducted by trained staff or third-party professionals. Low level infestations may escape visual detection.

For this reason, multiple detection tools, such as monitors containing attractants and canine detection may be utilized. The inspections shall occur within three business days of the resident report when possible.

The inspection shall cover the unit reporting the infestation and no less than the adjoining apartment in a duplex or surrounding apartments consisting of the units above, below, left and right in a multifamily building if these units exist.

If the initial inspection confirms the presence of bedbugs, the Greensboro Housing Authority will contact a licensed pest control company to treat the infestation. The length, method and extent of the treatment will depend on the severity and complexity of the infestation, and the level of cooperation of the residents. The resident may expect treatment to begin within five days of the inspection, though depending on the form of treatment and/or the availability of the contractor, this may not be possible. Residents should be advised that treatment may take several weeks and possibly several applications.

If an infestation is suspected but cannot be verified, the Greensboro Housing Authority will re-inspect the unit(s) periodically over the next several months.

If licensed pest control companies are unattainable within three calendar days, the Greensboro Housing Authority shall retain documentation of the efforts to obtain qualified services.

## 49.0 PRIVACY

The Greensboro Housing Authority is strongly committed to protecting the privacy of people dealing with the agency to the greatest degree practical. There are numerous federal privacy laws, regulations, notices, and other requirements that the Housing Authority follows to the greatest degree practical. Details about these requirements are set forth in PIH Notice 2015-06 and any ensuing publications. The Housing Authority will educate all of its employees who have access to personally identifiable information (PII) and/or Sensitive Personally Identifiable Information about these requirements and expect them to appropriately manage and safeguard the information. Employees will also be trained on the proper disposition of said information.

## GLOSSARY

**1937 Housing Act:** The United States Housing Act of 1937 [42 U.S.C. 1437 et seq.]

**50058 Form:** The HUD form that housing authorities are required to complete and electronically submit to HUD for each assisted household in public housing to record information used in the certification and re-certification process and, at the option of the housing authority, for interim reexaminations. Housing Authorities must retain at a minimum the last three years of the form

50058, and supporting documentation, during the term of each assisted lease, and for a period of at least three years from the end of participation date. Electronic retention of form HUD 50058 and HUD 50058-FSS and supporting documentation fulfills the record retention requirement. The 50058s must be submitted to HUD no later than 60 calendar days from the effective date of the actions recorded in Line 2b.

**Actual and imminent threat:** a physical danger that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include: The duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur.

**Absorption:** In portability, the point at which a receiving housing authority starts making assistance payments with funding under its consolidated ACC, rather than billing, the initial housing authority.[24 CFR 982.4]

**Adjusted Annual Income:** The amount of household income, after deductions for specified allowances, on which a tenant's rent is based.

**Administrative fee:** Fee paid by HUD to the housing authority for the administration of the program.

**Administrative Plan:** The plan that describes housing authority policies for the administration of the tenant-based programs.

**Admission:** The point when the family becomes a tenant in the program. In a tenant-based program, the date used for this purpose is the effective date of the first HAP Contract for a family (first day of initial lease term).

**Adult:** A household member who is 18 years or older or who is the head of the household, or spouse, or co-head. An emancipated minor is also considered an adult. An adult must have the legal capacity to enter a lease under State and local law. In the anti-drug portions of this policy, it also refers to a minor who has been convicted of a crime as an adult under any Federal, State or tribal law.

**Affiliated individual:** with respect to an individual, means: (1) A spouse, parent, brother, sister, or child of that individual, or a person to whom that individual stands in the place of a parent or guardian (for example, the affiliated individual is a person in the care, custody, or control of that individual); or (2) Any individual, tenant, or lawful occupant living in the household of that individual.

**Allowances:** Amounts deducted from the household's annual income in determining adjusted annual income (the income amount used in the rent calculation). Allowances are given for elderly families, dependents, medical expenses for elderly and disabled families, disability expenses, and



childcare expenses for children under 13 years of age. Other allowances can be given at the discretion of the housing authority.

**Amortization Payment:** In a manufactured home space rental: The monthly debt service payment by the family to amortize the purchase price of the manufactured home. If furniture was included in the purchase price, the debt service must be reduced by 15% to exclude the cost of the furniture. The amortization cost is the initial financing, not refinancing. Set-up charges may be included in the monthly amortization payment.

**Annual Contributions Contract (ACC):** The written contract between HUD and a housing authority under which HUD agrees to provide funding for a program under the 1937 Act, and the housing authority agrees to comply with HUD requirements for the program.

**Annual Income:** All amounts, monetary or not, that:

- a. Go to (or on behalf of) the family head or spouse (even if temporarily absent) or to any other family member, or
- b. Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- c. Are not specifically excluded from Annual Income.
- d. Annual Income also includes amounts derived (during the 12-month period) from assets to which any member of the family has access.

**Applicant (applicant family):** A family that has applied for admission to a program but is not yet a tenant in the program.

**Assets:** see net family assets.

**Asset Income:** Income received from assets held by household members. If assets total more than \$5,000, income from the assets is "imputed" and the greater of actual asset income and imputed asset income is counted in annual income.

**Assisted lease (lease):** A written agreement between an owner and a family for the leasing of a dwelling unit to the family. The lease establishes the conditions for occupancy of the dwelling unit by a family with housing assistance payments under a HAP contract between the owner and the housing authority.

**Bifurcate:** means to divide a lease as a matter of law, subject to the permissibility of such process under the requirements of the applicable HUD covered program and State or local law, such that certain tenants or lawful occupants can be evicted or removed and the remaining tenants or lawful occupants can continue to reside in the unit under the same lease requirements or as may be revised depending upon the eligibility for continued occupancy of the remaining tenants and lawful occupants.

**Business Days:** Days the housing authority is open for business.

**Certification:** The examination of a household's income, expenses, and family composition to determine the household's eligibility for program participation and to calculate the household's rent for the following 12 months.

**Child:** For purposes of citizenship regulations, a member of the family other than the family head or spouse who is under 18 years of age.

**Child care expenses:** Amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for childcare. In the case of childcare necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income.

**Citizen:** A citizen or national of the United States.

**Common space:** In shared housing: Space available for use by the assisted family and other occupants of the unit.

**Congregate housing:** Housing for elderly or persons with disabilities that meets the HQS for congregate housing.

**Consent form:** Any consent form approved by HUD to be signed by assistance applicants and tenants for the purpose of obtaining income information from employers and SWICAs, return information from the Social Security Administration, and return information for unearned income from the Internal Revenue Service. The consent forms may authorize the collection of other information from assistance applicants or tenants to determine eligibility or level of benefits.

**Contiguous MSA:** In portability, an MSA that shares a common boundary with the MSA in which the jurisdiction of the initial housing authority is located.

**Continuously assisted:** An applicant is continuously assisted under the 1937 Housing Act if the family is already receiving assistance under any 1937 Housing Act program when the family is admitted to the Housing Choice Voucher Program or is temporarily residing in a shelter for a legitimate reason.

**Controlling interest means:**

- (a) Holding more than 50 percent of the stock of any corporation; or
- (b) Having the power to appoint more than 50 percent of the members of the board of directors of a non-stock corporation (such as a non-profit corporation); or
- (c) Where more than 50 percent of the members of the board of directors of any corporation also serve as directors, officers, or employees of the PHA; or
- (d) Holding more than 50 percent of all managing member interests in an LLC; or
- (e) Holding more than 50 percent of all general partner interests in a partnership

**Cooperative:** Housing owned by a corporation or association, and where a member of the

corporation or association has the right to reside in a particular unit, and to participate in management of the housing.

**Cooperative member:** A family of which one or more members owns membership shares in a cooperative.

**Covered Families:** Families who receive welfare assistance or other public assistance benefits ("welfare benefits") from a State or other public agency ("welfare agency") under a program for which Federal, State, or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance.

**Covered Person:** For purposes of the anti-drug provisions of this policy, a covered person is a tenant, any member of the tenant's household, a guest or another person under the tenant's control.

**Currently engaging in:** With respect to behavior such as illegal use of a drug, other drug-related criminal activity, or other criminal activity, currently engaging in means that the individual has engaged in the behavior recently enough to justify a reasonable belief that the individual's behavior is current. Arrests alone are not sufficient evidence of criminal activity.

**Dating Violence:** Violence committed by a person: (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) the length of the relationship; (ii) the type of relationship; and (iii) the frequency of interaction between the persons involved in the relationship.

**Domicile:** The legal residence of the household head or spouse as determined in accordance with State and local law.

**Decent, safe, and sanitary:** Housing is decent, safe, and sanitary if it satisfies the applicable housing quality standards.

**Department:** The Department of Housing and Urban Development.

**Dependent:** A member of the family (except foster children and foster adults) other than the family head or spouse, who is under 18 years of age, or is a person with a disability, or is a full-time student.

**Disability assistance expenses:** Reasonable expenses that are anticipated, during the period for which annual income is computed, for attendant care and auxiliary apparatus for a disabled family member and that are necessary to enable a family member (including the disabled member) to be employed, provided that the expenses are neither paid to a member of the family nor reimbursed by an outside source.

**Disabled family:** A family whose head (including co-head), spouse, or sole member is a person with disabilities; or two or more persons with disabilities living together; or one or more persons with disabilities living with one or more live-in aides.

**Disabled person:** See "person with disabilities."

**Displaced family:** A family in which each member, or whose sole member, is a person displaced by governmental action (such as urban renewal), or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws.

**Displaced person:** A person displaced by governmental action (such as urban renewal), or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws.

**Domestic Violence:** Includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim share a child in common, by a person who is cohabitated with or has cohabited with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that persons acts under the domestic or family violence laws of the jurisdiction. The term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.

**Drug:** means a controlled substance as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802).

**Drug-related criminal activity:** The illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug.

**Drug-Related Criminal Activity:** The illegal manufacture, sale, or distribution, or the possession with intent to manufacture, sell, or distribute, of a controlled substance.

**Economic Abuse:** In the context of domestic violence, dating violence, and abuse in later life, means behavior that is coercive, deceptive, or unreasonably controls or restrains a person’s ability to acquire, use, or maintain economic resources to which they are entitled, including using coercion, fraud, or manipulation to—(A) restrict a person’s access to money, assets, credit, or financial information; (B) unfairly use a person’s personal economic resources, including money, assets, and credit, for one’s own advantage; or (C) exert undue influence over a person’s financial and economic behavior or decisions, including forcing default on joint or other financial obligations, exploiting powers of attorney, guardianship, or conservatorship, or failing or neglecting to act in the best interests of a person to whom one has a fiduciary duty.

**Economic self-sufficiency program:** Any program designed to encourage, assist, train or facilitate the economic independence of HUD-assisted families or to provide work for such families. These programs include programs for job training, employment counseling, work placement, basic skills training, education, English proficiency, workfare, financial or household management, apprenticeship, and any program necessary to ready a tenant for work (including a substance abuse or mental health treatment program), or other work activities.

**Elderly family:** A family whose head (including co-head), spouse, or sole member is a person who is at least 62 years of age; or two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides.

**Elderly person:** A person who is at least 62 years of age.

**Employment:** Employment for admission preference purposes is defined as:

Employment must be current and have lasted a minimum of 365 calendar days prior to the time the preference is claimed. The employment must provide a minimum of 30 hours of work per week for the family member claiming the preference. A break in employment up to 30 days will be considered to have fulfilled the employment preference.

The amount of earned income shall not be a factor in granting this preference.

The employment part of this preference is also extended equally to, (1) a family if the head, spouse, or sole member is 62 years of age or older or who is receiving social security or Supplemental Security Income disability benefits or any other payments based on the individual's inability to work and, (2) any family whose head, spouse, co-head or unrelated partner of head of household is currently a full time student or enrolled in an employment training program.

**Evidence of citizenship or eligible status:** The documents that must be submitted to evidence citizenship or eligible immigration status.

**Exception rent:** An amount that exceeds the published fair market rent.

**Extremely low-income families:** Those families whose incomes do not exceed the higher of 30% of the median income for the area, as determined by HUD with adjustments for smaller and larger families, or the Federal poverty level, except that HUD may establish income ceilings higher or lower than 30% of the median income for the area if HUD finds that such variations are necessary because of unusually high or low family incomes.

**Fair Housing Act:** Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988 (42 U.S.C. 3601 et seq.).

**Fair Market Rent (FMR):** The rent, including the cost of utilities (except telephone), as established by HUD for units of varying sizes (by number of bedrooms), that must be paid in the housing market area to rent privately-owned existing, decent, safe and sanitary rental housing of modest (non-luxury) nature with suitable amenities. FMRs are published periodically in the Federal Register.

**Family** includes but is not limited to:

- a. A family with or without children (the temporary absence of a child from the home due to placement in foster care shall not be considered in determining family composition and family size);
- b. An elderly family;
- c. A near-elderly family;

- d. A disabled family;
- e. A displaced family;
- f. The remaining member of a tenant family; and
- g. A single person who is not an elderly or displaced person, or a person with disabilities, or the remaining member of a tenant family.

**Family members:** include all household members except live-in aides, foster children and foster adults. All family members permanently reside in the unit, though they may be temporarily absent. All family members are listed on the HUD-50058 form.

**Family Rent to Owner:** In the housing choice voucher program, the portion of rent to owner paid by the family.

**Family self-sufficiency program (FSS program):** The program established by a housing authority to promote self-sufficiency of assisted families, including the coordination of supportive services (42 U.S.C. 1437u).

**Family share:** The portion of rent and utilities paid by the family or the gross rent minus the amount of the housing assistance payment.

**Family unit size:** The appropriate number of bedrooms for a family as determined by the housing authority under the housing authority's subsidy standards.

**First-time homeowner:** In the homeownership option, a family of which no member owned any present ownership interest in a residence of any family member during the three years before commencement of homeownership assistance for the family. The term "first-time homeowner" includes a single parent or displaced homemaker (as those terms are defined in 12 U.S.C. 12713) who, while married, owned a home with his or her spouse, or resided in a home owned by his or her spouse.

**50058 Form:** The HUD form that housing authorities are required to complete for each assisted household in public housing to record information used in the certification and re-certification process, and, at the option of the housing authority, for interim reexaminations.

**FMR/exception rent limit:** The HCVP existing housing fair market rent published by HUD headquarters, or any exception rent. For a tenancy in the Housing Choice Voucher Program, the housing authority may adopt a payment standard up to the FMR/exception rent limit.

**Full-time employment:** Employment that averages at least 30 hours per week. This can include self-employment as long as the employee earns at least the average of the federal minimum wage over a 30-hour period.

**Full-time student:** A person who is attending school or vocational training on a full-time basis as defined by the institution.

**Gender Identity:** Actual or perceived gender-related characteristics.

**Gross rent:** The sum of the rent to the owner plus any utilities.

**Group Home:** A dwelling unit that is licensed by a State as a group home for the exclusive tenential use of two to twelve persons who are elderly or persons with disabilities (including any live-in aide).

**Guest:** Means a person temporarily staying in the unit with the consent of a tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant.

**Head of household:** The adult member of the family who is the head of the household for purposes of determining income eligibility and rent.

**Home:** In the homeownership option: A dwelling unit for which the Greensboro Housing Authority pays homeownership assistance.

**Homeless (as defined for 50058 reporting purposes):** An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; or
- b. An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by a charitable organizations or by federal, state, or local government programs for low-income individuals); or
- c. An individual who is exiting an institution where he or she 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; Or any individual or family who:
  - a. Is fleeing, or is attempting to flee domestic violence, dating violence, sexual assault, Stalking, or other dangerous life-threatening conditions that related to violence against the individuals or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or made the individual or family afraid to return to their primary nighttime residence; and
  - b. Has no other residence; and
  - c. Lacks the resources or support networks, e.g. family, friends, and faith-based or other social networks, to obtain other permanent housing.

**Homeowner:** In the homeownership option, a family of which one or more members owns title to the home.

**Homeownership assistance:** In the homeownership option, monthly homeownership assistance payments by the Greensboro Housing Authority. Homeownership assistance payment may be paid

to the family, or to a mortgage lender on behalf of the family.

**Homeownership expenses:** In the homeownership option, a family's allowable monthly expenses for the home, as determined by the Greensboro Housing Authority in accordance with HUD requirements.

**Homeownership option:** Assistance for a homeowner or cooperative member under Sec. 982.625 to Sec. 982.641. A special housing type.

**Household members:** include all individuals who reside or will reside in the unit and who are listed on the lease, including live-in aides, foster children and foster adults.

**Housing Assistance Payment (HAP):** The monthly assistance by a housing authority, which includes (1) a payment to the owner for rent to the owner under the family's lease, and (2) an additional payment to the family if the total assistance payment exceeds the rent to owner.

**Housing quality standards (HQS):** The HUD minimum quality standards for housing assisted under the HCVP.

**Housing voucher:** A document issued by a housing authority to a family selected for admission to the Housing Choice Voucher Program. This document describes the program and the procedures for housing authority approval of a unit selected by the family. The housing choice voucher also states the obligations of the family under the program.

**Housing choice voucher holder:** A family that has an unexpired housing choice voucher.

**Immediate Family Member:** a spouse, parent, brother or sister, or child of the person, or an individual to whom that person stands in loco parentis (in place of a parent); or any other person living in the household of that person and related to that person by blood or marriage.

**Imputed income:** For households with net family assets of more than \$5,000, the amount calculated by multiplying net family assets by a HUD-specified percentage. If imputed income is more than actual income from assets, the imputed amount is used in determining annual income.

**Imputed welfare income:** The amount of annual income not actually received by a family, as a result of a welfare benefit reduction for welfare fraud or the failure to comply with economic self-sufficiency requirements, that is nonetheless included in the family's annual income for purposes of determining rent.

**Income category:** Designates a family's income range. There are three categories: low income, very low income and extremely low-income.

**Incremental income:** The increased portion of income between the total amount of welfare and earnings of a family member prior to enrollment in a training program and welfare and earnings of the family member after enrollment in the training program. All other amounts, increases and



decreases, are treated in the usual manner in determining annual income.

**Initial Housing Authority:** In portability, both: (1) a housing authority that originally selected a family that later decides to move out of the jurisdiction of the selecting housing authority; and (2) a housing authority that absorbed a family that later decides to move out of the jurisdiction of the absorbing housing authority.

**Initial payment standard:** The payment standard at the beginning of the HAP contract term.

**Initial rent to owner:** The rent to owner at the beginning of the initial lease term.

**Interest in the home:** In the homeownership option:

- a. In the case of assistance for a homeowner, “interest in the home” includes title to the home, any lease or other right to occupy the home, or any other present interest in the home.
- b. In the case of assistance for a cooperative member, “interest in the home” includes ownership of membership shares in the cooperative, any lease or other right to occupy the home, or any other present interest in the home.

**Interim (examination):** A reexamination of a household's income, expenses, and household status conducted between the annual recertifications when a change in a household's circumstances warrant such a reexamination.

**Jurisdiction:** The area in which the housing authority has authority under State and local law to administer the program.

**Law enforcement agency:** The National Crime Information Center (NCIC), police departments and other law enforcement agencies that hold criminal conviction records.

**Lease:** A written agreement between an owner and tenant for the leasing of a dwelling unit to the tenant. The lease establishes the conditions for occupancy of the dwelling unit by a family with housing assistance payments under a HAP Contract between the owner and the housing authority.

**Legal capacity:** The tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner.

**Life-threatening:** (1) Gas (natural or liquid petroleum) leak or fumes. A life-threatening condition under this standard is one of the following: (a) A fuel storage vessel, fluid line, valve, or connection that supplies fuel to a HVAC unit is leaking; or (b) a strong gas odor detected with potential for explosion or fire, or that results in health risk if inhaled.

(2) Electrical hazards that could result in shock or fire. A life-threatening condition under this standard is one of the following: (a) A light fixture is readily accessible, is not securely mounted to the ceiling or wall, and electrical connections or wires are exposed; (b) a light fixture is hanging by its wires; (c) a light fixture has a missing or broken bulb, and the open socket is readily accessible to the tenant during the day to day use of the unit; (d) a receptacle (outlet) or switch is missing or broken and electrical connections or wires are exposed; (e) a receptacle (outlet) or switch has a

missing or damaged cover plate and electrical connections or wires are exposed; (f) an open circuit breaker position is not appropriately blanked off in a panel board, main panel board, or other electrical box that contains circuit breakers or fuses; (g) a cover is missing from any electrical device box, panel box, switch gear box, control panel, etc., and there are exposed electrical connections; (h) any nicks, abrasions, or fraying of the insulation that expose conducting wire; (i) exposed bare wires or electrical connections; (j) any condition that results in openings in electrical panels or electrical control device enclosures; (k) water leaking or ponding near any electrical device; or (l) any condition that poses a serious risk of electrocution or fire and poses an immediate life-threatening condition.

(3) Inoperable or missing smoke detector. A life-threatening condition under this standard is one of the following: (a) the smoke detector is missing; or (b) the smoke detector does not function as it should.

(4) Interior air quality. A life-threatening condition under this standard is one of the following: (a) the carbon monoxide detector is missing; or (b) the carbon monoxide detector does not function as it should.

(5) Gas/oil fired water heater or heating, ventilation, or cooling system with missing, damaged, improper, or misaligned chimney or venting. A life-threatening condition under this standard is one of the following: (a) The chimney or venting system on a fuel fired water heater is misaligned, negatively pitched, or damaged, which may cause improper or dangerous venting of gases; (b) a gas dryer vent is missing, damaged, or is visually determined to be inoperable, or the dryer exhaust is not vented to the outside; (c) a fuel fired space heater is not properly vented or lacks available combustion air; (d) a non-vented space heater is present; (e) safety devices on a fuel fired space heater are missing or damaged; or (f) the chimney or venting system on a fuel fired heating, ventilation, or cooling system is misaligned, negatively pitched, or damaged which may cause improper or dangerous venting of gases.

(6) Lack of alternative means of exit in case of fire or blocked egress. A life-threatening condition under this standard is one of the following: (a) Any of the components that affect the function of the fire escape are missing or damaged; (b) stored items or other barriers restrict or prevent the use of the fire escape in the event of an emergency; or (c) the building's emergency exit is blocked or impeded, thus limiting the ability of occupants to exit in a fire or other emergency.

(7) Other interior hazards. A life-threatening condition under this standard is a fire extinguisher (where required) that is missing, damaged, discharged, overcharged, or expired.

(8) Deteriorated paint, as defined by 24 CFR 35.110, in a unit built before 1978 that is to be occupied by a family with a child under 6 years of age. This is a life-threatening condition only for the purpose of a condition that would prevent a family from moving into the unit. All lead hazard reduction requirements in 24 CFR part 35, including the timeline for lead hazard reduction procedures, still apply.

(9) Any other condition subsequently identified by HUD as life-threatening in a notice published in the Federal Register. HUD will notify the Greensboro Housing Authority if such changes are made.

(10) Any other condition identified by the Greensboro Housing Authority as life-threatening in this

administrative plan prior to the HUD Notice published in the January 18, 2017 Federal Register taking effect.

**Live-in aide:** A person who resides with one or more elderly persons, near-elderly persons or persons with disabilities and who is: (1) determined to be essential to the care and well-being of the persons; (2) is not obligated for the support of the persons; and (3) would not be living in the unit except to provide the necessary supportive services. It should be noted that the definition applies to a specific person. In accordance with this definition, a live-in aide is not a member of the assisted family and is not entitled to the HCV as the remaining member of the tenant family. Occasional, intermittent, multiple or rotating care givers do not meet the definition of a live-in aide since 24 CFR Section 982.402(7) implies live-in-aides must reside with a family permanently for the family unit size to be adjusted in accordance with the subsidy standards established by the PHA. Therefore, regardless of whether these caregivers spend the night, an additional bedroom should not be approved. (*See Section 10.9 on Verification of Live-in Aides*).

**Low-income families:** Those families whose incomes do not exceed 80% of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 80% of the median for the area on the basis of HUD's findings that such variations are necessary because of unusually high or low family incomes.

**Manufactured home:** A manufactured structure that is built on a permanent chassis, is designed for use as a principal place of residence, and meets the HQS.

**Manufacture home space:** In manufactured home space rental: A space leased by an owner to a family. A manufactured home owned and occupied by the family is located on the space.

**Medical expenses:** Medical expenses, including medical insurance premiums, that are anticipated during the period for which annual income is computed, and that are not covered by insurance.

**Membership shares:** In the homeownership option, shares in a cooperative. By owning such cooperative shares, the share-owner has the right to reside in a particular unit in the cooperative, and the right to participate in management of the housing.

**Mixed family:** A family whose members include those with citizenship or eligible immigration status, and those without citizenship or eligible immigration status.

**Moderate rehabilitation:** Rehabilitation involving a minimum expenditure of \$1000 for a unit, including its prorated share of work to be accomplished on common areas or systems, to:

- a. upgrade to decent, safe and sanitary condition to comply with the Housing Quality Standards or other standards approved by HUD, from a condition below these standards (improvements being of a modest nature and other than routine maintenance); or
- b. repair or replace major building systems or components in danger of failure.

**Monthly adjusted income:** One twelfth of adjusted income.

**Monthly income:** One twelfth of annual income.

**Mutual housing** is included in the definition of "cooperative".

**National:** A person who owes permanent allegiance to the United States, for example, as a result of birth in a United States territory or possession.

**Near-elderly family:** A family whose head (including co-head), spouse, or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons who are at least 50 years of age but below the age of 62 living together; or one or more persons who are at least 50 years of age but below the age of 62 living with one or more live-in aides.

**Net family assets:**

- a. Net cash value after deducting reasonable costs that would be incurred in disposal of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.
- b. In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income.
- c. In determining net family assets, housing authorities or owners, as applicable, shall include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received therefore. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant receives important consideration not measurable in dollar terms.
- d. For purposes of determining annual income under HCVP Homeownership, the term "net family assets" does not include the value of a home currently being purchased with assistance under the HCVP Homeownership Program. This exclusion is limited to the first 10 years after the purchase date of the home.

**Non-life-threatening:** Conditions that fail to meet the housing quality standards (HQS) and do not meet the definition of life-threatening as defined above.

**Noncitizen:** A person who is neither a citizen nor national of the United States.

**Notice of Funding Availability (NOFA):** For budget authority that HUD distributes by competitive process, the Federal Register document that invites applications for funding. This document explains how to apply for assistance and the criteria for awarding the funding.

**Occupancy standards:** The standards that the housing authority establishes for determining the appropriate number of bedrooms needed to house families of different sizes or composition.

**Other person under the tenant's control:** For the purposes of the definition of covered person it means the person, although not staying as a guest (as defined in this section) in the unit, is, or was at the time of the activity in question, on the premises (as premises is defined in this section) because of an invitation from the tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant. Absent evidence to the contrary, a person temporarily and infrequently on the premises solely for legitimate commercial purposes is not under the tenant's control.

**Owner:** Any person or entity, including a cooperative, having the legal right to lease or sublease existing housing. In the anti-drug related Areas of this policy, it means the owner of federally assisted housing.

**Tenant (tenant family):** A family that has been admitted to the housing authority's program and is currently assisted in the program. The family becomes a tenant on the effective date of the first HAP contract executed by the housing authority for the family (first day of initial lease).

**Payment standard:** In a housing choice voucher tenancy, the maximum monthly assistance payment for a family (before deducting the total tenant payment by family contribution). For a housing choice voucher tenancy, the housing authority sets a payment standard in the range from 90% to 110% of the current FMR.

**Permanently absent:** A person or persons not actually residing in the unit who once lived there and does not intend to return. One becomes permanently absent when one vacates the unit.

**Person with disabilities:** A person who:

- A. Has a disability as defined in 42 U.S.C. 423
- B. Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that:
  1. Is expected to be of long-continued and indefinite duration;
  2. Substantially impedes his or her ability to live independently; and
  3. Is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or
- C. Has a developmental disability as defined in 42 U.S.C. 6001

This definition does not exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome.

For purposes of qualifying for low-income housing, it does not include a person whose disability is based solely on any drug or alcohol dependence.

**Personally, Identifiable Information (PII):** Information which can be used to distinguish or trace an individual identify, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked to a specific individual, such as date and place of birth, mother’s maiden name, etc.

**Portability:** Renting a dwelling unit with HCVP tenant-based assistance outside the jurisdiction of the initial housing authority.

**Premises:** The building or complex in which the dwelling unit is located, including common areas and grounds. For purposes of the anti-drug provisions of this policy it means the building or complex or development in which the public or assisted housing dwelling unit is located, including common areas and grounds.

**Present ownership interest:** In the homeownership option, “Present ownership option” in a residence includes title, in whole or in part, to a residence, or ownership, in whole or in part, of membership shares in a cooperative. “Present ownership interest” in a residence does not include the right to purchase title to the residence under a lease-purchase agreement.

**Preservation:** This program encourages owners of eligible multifamily housing projects to preserve low-income housing affordability and availability while reducing the long-term cost of providing rental assistance. The program offers several approaches to restructuring the debt of properties developed with project-based HCVP assistance whose HAP contracts are about to expire.

**Private space:** In shared housing: The portion of a contract unit that is for the exclusive use of an assisted family.

**Processing Entity:** The person or entity who is responsible for making eligibility and related determinations and an income reexamination. In the HCVP and public housing programs the processing entity is the responsibility entity.

**Project-Based Assistance Program:** A HCVP administered by a Housing Authority pursuant to 24 CFR part 983, as amended by HUD in the Federal Register, Vol. 66, No. 10 on January 16, 2001 *Revisions to PHA Project-Based Assistance Program; Initial Guidance*.

**Proration of assistance:** The reduction in a family's housing assistance payment to reflect the proportion of family members in a mixed family who are eligible for assistance.

**Public Housing:** Housing assisted under the 1937 Act, other than under Section 8. Public housing includes dwelling units in a mixed finance project that are assisted by a PHA with capital or operating funds.

**Public Housing Agency:** A State, county, municipality or other governmental entity or public body (or agency or instrumentality thereof) authorized to engage in or assist in the development or operation of low-income housing.

**Reasonable rent:** A rent to owner that is not more than charged: (a) for comparable units in the private unassisted market; and (b) for a comparable unassisted unit in the premises.

**Receiving Housing Authority:** In portability, a housing authority that receives a family selected for participation in the tenant-based program of another housing authority. The receiving housing authority issues a housing choice voucher, and provides program assistance to the family.

**Re-certification:** A reexamination of a household's income, expenses, and family composition to determine the household's rent for the following 12 months.

**Remaining member of a tenant family:** A member of the family listed on the lease who continues to live in an assisted household after all other family members have left.

**Rent to owner:** The monthly rent payable to the owner under the lease. Rent to owner covers payment for any housing services, maintenance, and utilities that the owner is required to provide and pay for.

**Resident:** The person or persons (other than a live-in aide) who executes the lease as lessee of the dwelling unit. The term resident is interchangeable with the term tenant.

**Responsible Entity:**

- A. For the public housing program, the HCVP tenant-based assistance program (24 CFR 982), and the HCVP project-based voucher program (24 CFR 983), and the HCVP moderate rehabilitation program (24 CFR 882), responsible entity means the PHA administering the program under an ACC with HUD;
- B. For all other HCVP, responsible entity means the HCVP project owner.

**Sensitive Personally Identifiable Information:** PII that when lost, compromised or disclosed without authorization could substantially harm an individual. Examples of sensitive PII include social security or driver's license numbers, medical records, and financial account numbers such as credit or debit card numbers.

**Service Fee: Eligible uses for Service Fee:**

- Security deposit/utility arrears (if other sources are unavailable)
- Essential Household items for Participant
- Supportive Services by Partnering Agency
- Supportive Services by GHA
- Other Uses as determined by GHA to support families being housed

**Set-up charges:** In a manufactured home space rental, charges payable by the family for assembly, skirting and anchoring the manufactured home.

**Sexual assault:** any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.

**Sexual Orientation:** Homosexuality, heterosexuality, or bisexuality.

**Shared housing:** A unit occupied by two or more families. The unit consists of both common space for shared use by the occupants of the unit and separate private space for each assisted family.

**Shelter allowance:** That portion of a welfare benefit (e.g., TANF) that the welfare agency designates to be used for rent and utilities.

**Single person:** Someone living alone or intending to live alone who does not qualify as an elderly person, a person with disabilities, a displaced person, or the remaining member of a tenant family.

**Single room occupancy housing (SRO):** A unit for occupancy by a single eligible individual capable of independent living that contains no sanitary facilities or food preparation facilities, or contains either, but not both, types of facilities.

**Special admission:** Admission of an applicant that is not on the housing authority waiting list, or admission without considering the applicant's waiting list position.

**Special housing types:** Special housing types include: SRO housing, congregate housing, group homes, shared housing, cooperatives (including mutual housing), and manufactured homes (including manufactured home space rental).

**Specified welfare benefit reduction:**

- A. A reduction of welfare benefits by the welfare agency, in whole or in part, for a family member, as determined by the welfare agency, because of fraud by a family member in connection with the welfare program; or because of welfare agency sanction against a family member for noncompliance with a welfare agency requirement to participate in an economic self-sufficiency program.
- B. "Specified welfare benefit reduction" does not include a reduction or termination of welfare benefits by the welfare agency:
  - 1. at the expiration of a lifetime or other time limit on the payment of welfare benefits;
  - 2. because a family member is not able to obtain employment, even though the family member has complied with welfare agency economic self-sufficiency or work activities requirements; or
  - 3. because a family member has not complied with other welfare agency requirements.

**Stalking:** engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (1) Fear for the person's individual safety or the safety of others; or (2) Suffer substantial emotional distress.

**State Wage Information Collection Agency (SWICA):** The State agency receiving quarterly wage reports from employers in the State, or an alternative system that has been determined by the Secretary of Labor to be as effective and timely in providing employment-related income and



eligibility information.

**Statement of family responsibility:** An agreement in the form prescribed by HUD, between the housing authority and a family to be assisted under the Moderate Rehabilitation Program, stating the obligations and responsibilities of the family.

**Statement of homeowner obligations:** In the homeownership option, the family's agreement to comply with program obligations.

**Subsidy standards:** Standards established by a housing authority to determine the appropriate number of bedrooms and amount of subsidy for families of different sizes and compositions.

**Suspension:** Stopping the clock on the term of a family's housing choice voucher, for such period as determined by the housing authority, from the time when the family submits a request for housing authority approval to lease a unit, until the time when the housing authority approves or denies the request. Also referred to as tolling.

**Targeting Program:** A partnership between GHA, NCFHA and DHHS to increase units for individuals with disabling conditions. Developers are required to set-aside 10% of units at properties receiving an allocation of Housing Credits and may opt to set-aside to 20% of units for Program Qualified Tenants.

**Technological Abuse:** An act or pattern of behavior that occurs within domestic violence, sexual assault, dating violence or stalking and is intended to harm, threaten, intimidate, control, stalk, harass, impersonate, exploit, extort, or monitor, except as otherwise permitted by law, another person, that occurs using any form of technology, including but not limited to: internet enabled devices, online spaces and platforms, computers, mobile devices, cameras and imaging programs, apps, location tracking devices, or communication technologies, or any other reemerging technologies.

**Temporarily absent:** A person or persons not actually residing in a unit for a period of time while still maintaining control of the unit. If the absence exceeds 30 calendar days, the Housing Authority must agree to the absence.

**Temporary Assistance to Needy Families (TANF):** The program that replaced the Assistance to Families with Dependent Children (AFDC) that provides financial assistance to needy families who meet program eligibility criteria. Benefits are limited to a specified time period.

**Tenant:** The person or persons (other than a live-in aide) who executes the lease as lessee of the dwelling unit. The term tenant is interchangeable with the term resident.

**Third-party (verification):** Oral or written confirmation of a household's income, expenses, or household composition provided by a source outside the household, such as an employer, doctor, school official, etc.

**Tolling:** see suspension.

### **Total tenant payment (TTP):**

- (1) Total tenant payment is the amount calculated under Section 3(a)(1) of the 1937 Act which is the higher of:
  - a. 30% of the family's monthly adjusted income;
  - b. 10% of the family's monthly income;
  - c. Minimum rent; or
  - d. if the family is receiving payments for welfare assistance from a public agency and a part of such payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of such payments which is so designated.
- (2) If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under Section 3(a)(1) shall be the amount resulting from one application of the percentage.

**Tuition:** The amount of tuition and required fees covering a full academic year most frequently charged to students. These values represent what a typical student would be charged and may not be the same for all students at an institution. If tuition is charged on a per-credit-hour basis, the average full-time credit hour load for an entire academic year is used to estimate average tuition. Required fees include all fixed sum charges that are required of a large proportion of all students. The student who does not pay the charges is an exception. Verification of tuition and fees can be obtained from the student's bill or annual statement, by contacting the bursar's office, or from the school's website.

Examples of required fees include, but are not limited to, writing and science lab fees and fees specific to the student's major or program (i.e., nursing program).

Expenses related to attending an institution of higher education must **not** be included as tuition. Examples of these expenses include, but are not limited to, room and board, books, supplies, meal plans, transportation and parking, student health insurance plans, and other non-fixed sum charges.

For section 8 programs only, PHAs must include amounts of financial assistance an individual receives in excess of tuition and other required fees and charges when determining annual income.

For the Public Housing program, the full amount of financial assistance a student receives while participating in the program continues to be excluded from the program participant's annual income

**Units owned by the Greensboro Housing Authority:** only if the unit is in a project that is one of the following categories: (1) Owned by a Greensboro Housing Authority. (2) Owned by an entity

wholly controlled by the Greensboro Housing Authority. (3) Owned by a limited liability company or limited partnership in which the Greensboro Housing Authority (or an entity wholly controlled by the Greensboro Housing Authority) holds a controlling interest in the managing member or general partner. A “controlling interest” is— (A) holding 50 percent or more of the stock of any corporation; (B) having the power to appoint 50 percent or more of the members of the board of directors of a non-stock corporation (such as a non-profit corporation); (C) where 50 percent or more of the members of the board of directors of any corporation also serve as directors, officers or employees of the Greensboro Housing Authority; (D) holding 50 percent or more of all managing member interests in an LLC; (E) holding 50 percent or more of all general partner interests in a partnership; or (F) equivalent levels of control in other organizational structures. Units in which Greensboro Housing Authority has a different ownership interest are no longer considered to be owned by the Greensboro Housing Authority. In order to be considered a “Greensboro Housing Authority-owned” unit as described above, the Greensboro Housing Authority must have ownership interest in the building itself, not simply the land beneath the building.

**Utility allowance:** If the cost of utilities (except telephone) and other housing services for an assisted unit is not included in the tenant rent but is the responsibility of the family occupying the unit, an amount equal to the estimate made or approved by a housing authority or HUD of the monthly cost of a reasonable consumption of such utilities and other services for the unit by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful living environment.

**Utility hook-up charge:** In a manufactured home space rental, costs payable by a family for connecting the manufactured home to utilities such as water, gas, electrical and sewer lines.

**Utility reimbursement:** The portion of the housing assistance payment that exceeds the amount of the rent to owner. It is only paid when the housing assistance payment exceeds the rent to owner. If the cost of utilities (except telephone) and other housing services for an assisted unit is not included in the tenant rent but is the responsibility of the family occupying the unit, an amount equal to the estimate made or approved by a PHA of the monthly cost of a reasonable consumption of such utilities and other services for the unit by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful living environment.

**VAWA:** The Violence Against Women Act of 1994, as amended (42 U.S.C. 13925 and 42 U.S.C. 14043e et seq.).

**Verification:**

- a. The process of obtaining statements from individuals who can attest to the accuracy of the amounts of income, expenses, or household member status (e.g., employers, public assistance agency staff, doctors).
- b. The three types of verification are:
  - (1) Third-party verification, either written or oral, obtained from employers, public assistance agencies, schools, etc.
  - (2) Documentation such as a copy of a birth certificate or bank statement

- (3) Family certification or declaration (only used when third-party or documentation verification is not available)

**Very low-income families:** Families whose incomes do not exceed 50% of the median family income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 50% of the median for the area if HUD finds that such variations are necessary because of unusually high or low family incomes.

**Violent criminal activity:** Means any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage. Arrests alone are not sufficient evidence of criminal activity.

**Voucher (rental voucher):** A document issued by a housing authority to a family selected for admission to the Housing Choice Voucher Program. This document describes the program and the procedures for housing authority approval of a unit selected by the family and states the obligations of the family under the program.

**Voucher holder:** A family holding a housing choice voucher with unexpired search time.

**Waiting list admission:** An admission from the housing authority waiting list. [24 CFR 982.4]

**Welfare Assistance:** Welfare or other payments to families or individuals, based on need, that are made under programs funded, separately or jointly, by Federal, State or local governments (including assistance provided under the Temporary Assistance for Needy Families (TANF) program, as that term is defined under the implementing regulations issued by the Department of Health and Human Services at 45 CFR 260.31).

45 CFR 260.31 defines the term “assistance” to include cash, payments, vouchers, and other forms of benefits designed to meet a family's ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses).

It includes such benefits even when they are:

3. Provided in the form of payments by a TANF agency, or other agency on its behalf, to individual recipients; and
- B. Conditioned on participation in work experience or community service (or any other work activity under 45 CFR 261.30).

Except where excluded later in this definition, it also includes supportive services such as transportation and childcare provided to families who are not employed.

The term “assistance” excludes:

- A. Nonrecurrent, short-term benefits that:
  - 1. Are designed to deal with a specific crisis situation or episode of need;
  - 2. Are not intended to meet recurrent or ongoing needs; and
  - 3. Will not extend beyond four months.
- B. Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);
- C. Supportive services such as child care and transportation provided to families who are employed;
- D. Refundable earned income tax credits;
- E. Contributions to, and distributions from, Individual Development Accounts;
- F. Services such as counseling, case management, peer support, childcare information and referral, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support; and
- G. Transportation benefits provided under a Job Access or Reverse Commute project, pursuant to section 404(k) of the Act, to an individual who is not otherwise receiving assistance.

**Welfare rent:** In "as-paid" welfare programs, the amount of the welfare benefit designated for shelter and utilities.

**Welfare -to-Work (WTW) families:** Families assisted with housing choice voucher funding awarded under the HUD welfare-to-work voucher program.

## Acronyms

ACC	Annual Contributions Contract
CACC	Consolidated Annual Contributions Contract
CFR	Code of Federal Regulations
FMR	Fair Market Rent

FSS	Family Self Sufficiency (program)
HA	Housing Authority
HAP	Housing Assistance Payment
HCDA	Housing and Community Development Act
HQS	Housing Quality Standards
HUD	Department of Housing and Urban Development
USCIS	(U.S.) Citizenship and Immigration Service
NAHA	(Cranston-Gonzalez) National Affordable Housing Act
NOFA	Notice of Funding Availability
OMB	(U.S.) Office of Management and Budget
PBC	Project-Based Certificate (program)
QHWRA	Quality Housing and Work Responsibility Act of 1998
PHA	Public Housing Agency
TTP	Total Tenant Payment
VAWA	Violence Against Women Act

**CHAPTER 13**  
(Public Housing Occupancy Guidebook)

**TENANT SELECTION AND ASSIGNMENT PLAN**

**A. ORGANIZATION OF THE WAITING LIST**

It is the HPHA's policy that each applicant shall be assigned his/her appropriate place on a centralized waiting list in sequence based upon date and time the application is received, suitable type or size of unit, and factors affecting preference. Preference factors are established in this policy in accordance with HUD regulations and are consistent with the objectives of Titles VI of the Civil Rights Act of 1974, Title VII of the Civil Rights Act of 1968 and HUD regulations and requirements pursuant thereto. Exceptions to city-wide waiting lists will be permitted only to comply with court orders, settlement agreements, or when approved in advance by the HUD Assistant Secretary for Fair Housing and Equal Opportunity. All applications will be maintained in order of bedroom size, preferences, and then in order of date and time of application; the application will be a permanent file; any contacts between the High Point Housing Authority and the applicant will be documented in the applicant file.

The primary goals of this plan are to:

1. Prohibit the concentration of low-income families in public housing; and
2. Encourage Income Targeting.

The HPHA may not concentrate very low-income families in public housing units in certain public housing projects or certain buildings within projects. The HPHA will submit with its annual HPHA plan and Admissions Policy designed to provide for de-concentration of poverty and income-mixing by bringing higher income tenant into lower income projects and lower income tenants into higher income projects. The HPHA may offer incentives for eligible families having higher incomes to occupy dwelling units in projects predominantly occupied by eligible families having lower incomes and provide for occupancy of eligible families having higher income. The skipping of a Family on the waiting list to reach another Family to implement de-concentration will be utilized as permitted by HUD.

Not less than forty percent (40%) of new families will have incomes at or below thirty percent (30%) of the area median income.

The remaining Family admissions will be at or below eighty percent (80%) of the area median income.

**B. METHOD OF APPLICANT SELECTION**

The HPHA will first match the characteristics of the applicant to the unit available, including any priorities for admission required for designated or mixed population housing. Applicable local preferences as described in this policy will then be used to determine the order of selection from the waiting list. Further, in the selection of a Family for a unit with accessible features the HPHA will give preference to families that include a person with disabilities who can benefit from the unit features.

The plan for selection of applicants and assignment of dwelling units to assure equal opportunity and non-discrimination on grounds of race, color, sex, religion, or National origin is Plan "B". Under this plan each qualified applicant first in sequence on the waiting list is made three offers of a unit of appropriate size. The applicant must accept one of the three units offered or be removed from the waiting list ("unless the refusal was for good cause").

Selection will be in such a manner as:

1. To avoid concentration of the most economic and socially deprived families in (1) one or all of the developments operated by the HPHA;
2. To comply with HPHA screening standards, as provided in Chapter 8;
3. To maintain a resident body in each development composed of families with a broad range of incomes and rent paying ability which is generally representative of the range of incomes of the low-income families in the HPHA's area of operation;
4. To give preference to applicants who are otherwise eligible for assistance and who at the time they apply for housing assistance, are living within the jurisdiction of High Point, NC;
5. To achieve both the goals of reducing poverty and mixing incomes in public housing; and
6. To not delay or otherwise deny admission to the program based on the race, color, ethnic origin, gender, religion, disability, or age of any member of an applicant Family.

#### C. ORDER OF APPLICANT SELECTION

The order of selection listed below is to be applied within the ranges of Income/Rent adopted by the HA:

##### **First Preference:**

Families who reside inside or whose Head of Household or Spouse is employed or have been hired to work within the corporate limits of the City of High Point. This also includes graduates and/or participants in, education and training programs, provided the education or training program is designed to prepare individuals for the job market within the jurisdiction of High Point, NC. These families shall be ranked in accordance with the following criteria.

- Families that have been determined to be emergencies, have Emergencies as defined as: "Displaced by disaster, such as fire or flood; displacement by government action; domestic violence; displacement to avoid reprisals; displacement by hate crimes, or as further defined by Chief Executive Officer;



- Families with at least (1) one Adult who is employed. (This ranking is extended equally to elderly families or families whose head or Spouse is receiving income based on their inability to work);
- Families where the Head or Spouse is a Veteran or in the service of the military of the United States of America; and
- Chronic Homeless Persons with Case Management Support: Consistent with Partnering Ending Homelessness Plan to End homelessness. HPHA will give a preference to families/ individuals who are defined by HUD as chronically homeless. Referral must come from the agency providing the case management and individual/Family must continue receiving regular on-site case management for at least one (1) year after receiving housing assistance.

**Second Preference:**

Families who do not reside inside the corporate limits of the City of High Point: These families shall be ranked in accordance with the following criteria.

- Families that have been determined to be emergencies, have Emergencies as defined as: "Displaced by disaster, such as fire or flood; displacement by government action; domestic violence; displacement to avoid reprisals; displacement by hate crimes, or as further defined by the Chief Executive Officer".
- Families with at least (1) one Adult who is employed. (This ranking is extended equally to elderly families or families whose Head or Spouse is receiving income based on their inability to work);
- Families where the Head or Spouse is a Veteran or in the service of the military of the United States of America; and
- Chronic Homeless Persons with Case Management Support: Consistent with Partnering Ending Homelessness Plan to End homelessness. HPHA will give a preference to families/ individuals who are defined by HUD as chronically homeless. Referral must come from the agency providing the case management and individual/Family must continue receiving regular on-site case management for at least one (1) year after receiving housing assistance.

Applicants will be selected by date and time of application for both first and second preference and within each ranked category shown.

**D. ACCEPTANCE/REFUSAL OF OFFER**

**CHAPTER 4**  
(24 CFR 982.204-207; Housing Choice Voucher Guidebook)

**ESTABLISHING PREFERENCES AND MAINTAINING THE WAITING LIST**

It is the HPHA's objective to ensure that the families are placed in the proper order on the Waiting List so that an offer of assistance is not delayed to a Family or made to any Family prematurely. This chapter defines the eligibility criteria for the Local Preferences and explains the HPHA's system of applying them. By maintaining an accurate Waiting List, the HPHA will be able to perform the activities which ensure that an adequate pool of qualified Applicants will be available so that program funds are used in a timely manner.

**A. APPLICATION POOL**

The Waiting List will be maintained in accordance with the following guidelines:

1. The application will be a permanent file;
2. All Applicants in the pool will be maintained in order of preference. Applications equal in preference will be maintained by in order of date and time of placement on the Waiting List; and
3. All Applicants must meet "Very Low Income" eligibility requirements as established by HUD, and a minimum of (75%) **seventy five percent of new Admissions must be for "Extreme Low" families**, whose Incomes do not exceed thirty percent (30%) of the area median Income Any exceptions to these requirements, other than those outlined in Chapter 2, "Eligibility for Admission," must have been approved previously by the HUD Field Office.

**Special Admissions**

Applicants who are admitted under Special Admissions (see Section F below) rather than from the Waiting List are identified by codes on the Waiting List.

Applicants who are admitted under targeted funding which are not identified as a Special Admission are identified by codes and are not maintained on separate Waiting Lists.

**B. WAITING LIST PREFERENCES**

An Applicant will not be granted any preference if any member of the Family has been evicted from any federally assisted housing during the past five (5) years—due to Drug-Related Criminal Activity or Violent Criminal Activity.

The HPHA may grant an exception to such a Family only for professionally documented cases of a successful completion of a drug rehabilitation program (acceptable documents include case worker statements, parole officer statements, court agreements that demonstrated completion of an acceptable rehabilitation program).

**C. INITIAL DETERMINATION OF LOCAL PREFERENCE QUALIFICATION**

At the time of application, an Applicant's entitlement to a Local Preference may be made based on:

An Applicant's certification that they qualify for a Local Preference will be accepted without verification for placement on the Waiting List. When the Family is selected from the Waiting List for the final determination of eligibility, the preference will be verified.

The HPHA may re-verify a preference claim if the HPHA Family's circumstances have changed at time of selection from the Waiting List.

If the preference verification indicates that an Applicant does not qualify for the preference, the Applicant will be returned to the Waiting List and ranked without the Local Preference and given an opportunity for a meeting.

If, at the time the Family applied, the preference claim was the only reason for placement of the Family on the list and Family cannot verify their eligibility for the preference as of the date of application, the Family will be removed from the list.

#### **D. LOCAL PREFERENCE**

Families who reside within or whose Head of Household Spouse is employed or have been hired to work within the corporate limits of the City of High Point will receive a Local Preference. This also includes graduates and/or Participants in, education and training programs within the jurisdiction of High Point, N.C. These families will be selected for housing assistance prior to families residing outside the jurisdiction of High Point, N.C.

#### **E. RANKING PREFERENCES**

Ranking Preferences are used to prioritize Applicants within the Local Preference.

These categories will receive a Ranking Preference:

##### **First Preference:**

Families who reside inside or whose Head of Household or Spouse is employed or have been hired to work, and graduates of, or are now participating in, education and training programs, within the jurisdiction of High Point, NC, in the following order:

Families with a Head or Spouse that is elderly or disabled;

Families that have been determined to have emergencies defined as displaced by disaster, such as fire or flood; displacement by government action; domestic violence, displacement to avoid reprisals; displacement by hate crimes, or as further defined by the Chief Executive Officer;

Families with at least one (1) adult who is employed. (This ranking is extended equally to elderly families or families whose head or Spouse is receiving Income based on their inability to work);

Families where the head or Spouse is a Veteran or in the service of the military of the United States of America,

##### **Second Preferences:**

Families who reside inside or whose Head of Household or Spouse is employed or have been hired to work, and graduates of, or are now participating in, education and training programs, outside of the jurisdiction of High Point, NC, in the following order:

Families with a Head or Spouse that is elderly or disabled.

Families that have been determined to have emergencies, defined as displacement by disaster, such as fire or flood; displacement by government action; domestic violence; displacement to avoid reprisals; displacement by hate crimes, or as further defined by Chief Executive Officer.

Families with at least one (1) adult who is employed, which ranking is extended equally to elderly families or Family whose head or Spouse is receiving Income based on their inability to work.

Families where the Head or Spouse is a Veteran or in the service of the military of the United States of America; and

Within each ranked category above, Applicants will be selected by date and time.

#### **F. EXCEPTIONS FOR SPECIAL ADMISSIONS (24 CFR 982.203)**

If HUD awards a HPHA program funding that is targeted for specifically named families, the HPHA will admit these families under a Special Admission procedure.

Special Admissions families will be admitted outside of the regular Waiting List process. They do not have to qualify for any preferences, nor are they required to be on the program Waiting List. They are not counted in the limit on non-federal preference Admissions. The HPHA maintains separate records of these Admissions.

The following are examples of types of program funding that may be designated by HUD for families living in a specified UNIT:

1. A Family displaced because of demolition or disposition of a public or Indian housing project;
2. A Family residing in a Multifamily rental housing project when HUD sells, forecloses or demolishes the project;
3. A Family residing in housing covered by the Low-Income Housing Preservation and Resident Homeownership Act of 1990;
4. A Family residing in a project covered by a project-based Section 8 HAP Contract at or near the end of the HAP Contract term; and
5. A non-purchasing Family residing in a HOPE 2 project.

#### **G. TARGETED FUNDING**

When HUD awards special funding for certain Family types, families who qualify are placed on the regular Waiting List. When a specific type of funding becomes available, the Waiting List is searched for the first available Family that meets the targeted funding criteria.

The HPHA has the following "Targeted" Programs:

- Family Unification Program (FUP);
- Mainstream Disability Program (MDP); and
- Veterans Affairs Supportive Housing (VASH).

#### **H. REFERENCE ELIGIBILITY**

##### **Change in Circumstances**

Changes in an Applicant's circumstances while on the Waiting List may affect the Family's entitlement to a preference. Applicants are required to notify the HPHA in writing when their circumstances change. When an Applicant claims an additional preference, s/he will be placed on the Waiting List in the proper order of their newly claimed preference.

An exception to this policy applies if, at the time the Family applied, the Waiting List was only open to families who claimed the Local Preference, which that Family initially claimed. In such case, the Applicant must verify eligibility for the initial preference before the Family will be returned to the Waiting List with the new preference.

### **Cross Listing of Public Housing and Section 8**

The HPHA will not merge the Waiting Lists for public housing and Section 8. However, if the Section 8 Waiting List is open when the Applicant is placed on the public housing list, the HPHA must offer to place the Family on both lists. If the public housing Waiting List is open at the time an Applicant applies for Section 8, the HPHA must offer to place the Family on the public housing Waiting List.

## **I. ORDER OF SELECTION**

### **Local Preferences**

**First Preference:** These Applicants will be selected first and ranked in the following order:

Families who reside inside or whose Head or Spouse are employed or have been hired to work within the corporate limits of the City of High Point. This also includes graduates and/or Participants in, education and training programs. These families shall be ranked in accordance with the following criteria:

- a) Families with a Head or Spouse that is elderly or disabled;
- b) Families that have been determined to have emergencies, defined as displacement by disaster, such as fire or flood; displacement by government action; domestic violence; displacement to avoid reprisals; displacement by hate crimes, or as further defined by the Chief Executive Officer;
- c) Families with at least (1) one adult who is employed. (This ranking extended equally to elderly families or a Family whose head or Spouse is receiving Income based on their inability to work); and
- d) Families where the Head or Spouse is a Veteran or in the service of the military of the United States of America.

**Second Preference:** These Applicants will be selected after the First Preference Applicants and ranked in the following order:

Families who do not reside inside or whose Head of Household or Spouse work or have not been hired to work, and are not graduates of, or are not Participants in education and training programs, in the jurisdiction of High Point, NC, in the following order:

These Families shall be ranked in accordance with the following criteria:

- a) Families with a Head or Spouse that is elderly or disabled;
- b) Families that have been determined to have emergencies, defined as by disaster, such as fire or flood; displacement by government action; domestic violence; displacement to avoid reprisals; displacement by hate crimes, or as further defined by the Chief Executive Officer;



[www.youthfocus.org](http://www.youthfocus.org)

October 22, 2024

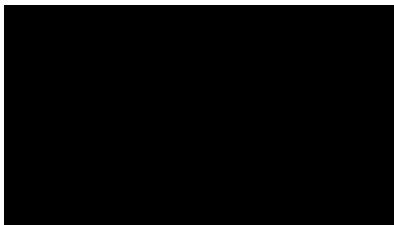
To Whom It May Concern:

This serves as a letter of support for the Guilford County Continuum of Care. I currently serve as a Board Member for one of the Guilford County CoC's Project Applicants, Youth Focus. As someone who has experienced homelessness firsthand, I know how important these programs are for our community. The support and services I received from a CoC-funded program during a time of greatest vulnerability was a critical part of my journey out of homelessness to a place of stability and success. This was true both for myself and my child, as well.

Now, I am proud to serve on Youth Focus' Board of Directors to help support and guide our community response to the important issue of serving individuals and families experiencing homelessness. The Guilford County CoC is committed to ensuring those with the greatest service needs receive the services they need to move out of homelessness.

Please consider fully supporting Guilford County Continuum of Care's application for funding as it is meeting a critical need in our community and having significant impact for individuals and families experiencing homelessness in our community.

Sincerely,



Youth Focus Board Member



Counseling | Emergency Housing | Safe Place | Supportive Housing



1417 Glenwood Avenue, Greensboro, NC 27403  
Phone: (336) 275-8585  
Fax: (336) 370-1540  
[www.theservantcenter.org](http://www.theservantcenter.org)

October 24, 2024

To Whom It May Concern:

My name is [REDACTED] and I am on the board of directors for The Servant Center. My family and I experienced homelessness in Guilford County for more than 2 years. We were referred to The Servant Center to assist us with housing and we moved into our own place in January of 2024.

My family was connected to Guilford County's Coordinated Entry program to be assessed for housing and through my experience with that process, I am aware of how Guilford County's homeless crisis response system works.

I fully support the Guilford County CoC's priorities for serving individuals and families experiencing homelessness with severe service needs.

Sincerely,

[REDACTED]

My name is [REDACTED], I am a [REDACTED] male that experienced homelessness for 2+ years. With help from the CoC I received a housing voucher. A month after moving into my apartment I found employment with BBB/DGI as a Hospitality Ambassador. I have been a Downtown Greensboro Ambassador for 2 yrs and we have turned to street outreach, due to the high population of unhoused individuals.

The CoC is key to helping our homeless population receive the help and resources they need to overcome their situations. They also provide or organization (BBB/DGI) with the assistance that we need to do our part in helping with this homeless crisis.

For me personally the CoC helped me completely turn my life around. I currently have 2 1/2 years sober, my own apartment, 1 year tobacco free, drastically improved my credit, savings account, two years employment doing street outreach, and I also received my North Carolina Peer Support Specialist Certification (NCCPSS).

Without the CoC I believe I would not be here today writing this letter. I am one of many that the CoC has made a huge impact or changed their lives. The CoC is invaluable to myself and my community.

Sincerely,

[REDACTED]  
10/23/24



## **HOUSING FIRST ASSESSMENT**

GRANTEE: Family Service of the Piedmont

DATE: 3/4/2024

GRANT #: NC0360L4F042206

GRANT PERIOD: 07/01/2022 - 06/30/2023

PROJECT NAME: Victim Rapid Re-Housing

PROJECT TYPE: Rapid Re-Housing

### **INTRODUCTION and INSTRUCTIONS**

The NC 504 Housing First Assessment Tool is designed to assist Continuum of Care funded agency Directors, project staff, and the CoC, conduct a compliance and regulatory review of assisted projects and help agencies prepare for monitoring.

Agency staff should complete the Housing First Assessment Tool below and return the completed document via email to [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) no later than **Monday, April 1, 2024 at 5:00PM**. **Additionally, please include a complete copy of the Agency's Operations/Project Manual and Intake Packet with the completed assessment for each of the Grantee's funded projects.**

Use of the Housing First Assessment Tool may generate questions from Grantees, identify gaps in policies and procedures, or highlight an agency's best practices beyond HUD or the CoC's requirements. While the CoC Collaborative Applicant is required to monitor Grantees, the use of the Housing First Assessment Tool and the subsequent debriefing meeting is intended to inform and assist Grantees maintain contract compliance and adherence to Housing First in all CoC funded projects and programs.

Both the CoC Collaborative Applicant and support staff are available to answer questions, provide resources, and assist each agency or assigned staff member in this process. Please do not hesitate to reach out with questions, comments, or concerns.

Thank you,

The Guilford County Continuum of Care Collaborative Applicant Team

HOUSING FIRST ASSESSMENT		YES	NO	COMMENTS/DOCUMENTATION
The Grantee follows a "Housing First" approach that is documented in the agency operating policies and procedures and intake documents?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.	

The Grantee quickly moves participants into housing from the referral from the Coordinated Entry System?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Where possible and in accordance with service to our target population: victims of domestic violence, sexual assault and human trafficking
The Grantees' Programs or projects that cannot serve someone referred through coordinated entry (CE), work through the CE process to ensure that those individuals or families have access to housing and services elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
Are people with disabilities offered clear opportunities to request reasonable accommodations within applications, screening processes, and during tenancy, that accommodate disabilities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
The Grantee complies with HUD Equal Access and Gender Identity final Rule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
The Grantee ensures that program participants are not screened out based on the following:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
a. Having too little or no income.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
b. Active or history of substance and/or alcohol abuse.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
c. Having a criminal record/justice involvement.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
d. History of domestic violence (e.g. lack of protective/restraining order, period of separation from abuser, or law enforcement involvement).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
Does the Grantee ensure that project participants are not terminated from the program for the following reasons?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
a. Failure to participate in supportive services.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
b. Failure to make progress on a service plan.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
c. Loss of income or failure to improve income.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
d. Being a victim of domestic violence.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
e. Active substance and/or alcohol abuse, in and of itself, without other lease violations, is not basis for termination and/or eviction.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
Project participants are provided with written information at intake regarding their rights and responsibilities as tenants/participants, including the causes for project termination or eviction.			

<p>Voluntary supportive services offered to project participants emphasize engagement and problem-solving over therapeutic goals.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Click here to enter text.</p>
<p>Participation in services or compliance with service plans are not conditions of tenancy, but are reviewed with project participants and regularly offered as a resource to those who may want to choose to engage in services at another time.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Click here to enter text.</p>
<p>Services are informed by a ‘harm-reduction’ philosophy that recognizes that drug and alcohol use and addiction are a part of some program participant’s lives.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Click here to enter text.</p>
<p>Project participants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Click here to enter text.</p>
<p>Project participants in supportive housing are given reasonable flexibility in paying their portion of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Click here to enter text.</p>
<p>The Grantee makes every effort to secure and maintain units for project participants, even if they leave their units due to illness, incarceration, in-patient treatment or any other temporary stay away from the unit.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Click here to enter text.</p>
<p>Every effort is made to provide project participants the opportunity to transfer from one housing situation, program, or project to another if a tenancy is in jeopardy or the household requires more appropriate support to maintain housing.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Click here to enter text.</p>



## GUILFORD COUNTY CONTINUUM OF CARE

Working to End Homelessness in Guilford County

July 12, 2024

Re: Housing First Assessment for Victim Rapid Re-Housing Program  
Family Service of the Piedmont  
Tom Campbell, President & CEO  
902 Bonner Drive  
Jamestown, NC 27282

Dear Tom Campbell,

Thank you for submitting your Housing First Assessment for the Victim Rapid Re-Housing Program on April 1, 2024. Upon review of your Housing First Assessment, policies, and procedures, your Victim Rapid Rehousing program appears to be following the Housing First model. No issues were noted, and we have no recommendations at this time. Thank you for your agency's commitment to serving the most vulnerable in our community, including those experiencing homelessness.

If you have any inquiries regarding this matter, please contact the CoC Team at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov). Also included is Housing First information for your agency's reference. Thank you for being a great partner in this Housing First assessment process this year.

Best regards,  
Guilford County CoC Lead Collaborative Applicant Team

Enclosures: Housing First in Permanent Supportive Housing , Housing First , and Housing First Checklist.

## FSOP Housing First Assessment



infoCoC

To [tom.campbell@fspcares.org](mailto:tom.campbell@fspcares.org), [info.CoC](mailto:info.CoC)

Cc [Cheri Neal](#), [Rykiell Turner](#), [Maria Lyons Legrande](#)

This message was sent with High importance.  
If there are problems with how this message is displayed, click here to view it in a web browser.



FSOP - Housing First Assessment Feedback Letter 2024.pdf

121 KB

[Reply](#) [Reply All](#) [Forward](#) [...](#)

Mon 7/15/2024 2:39 PM

Good afternoon,

Thank you for submitting your Housing First Assessment for the Victim Rapid Re-Housing Program on April 1, 2024. Upon review of your Housing First Assessment, policies, and procedures, your Victim Rapid Rehousing program appears to be following the Housing First model. No issues were noted, and we have no recommendations at this time. Thank you for your agency's commitment to serving the most vulnerable in our community, including those experiencing homelessness.

If you have any inquiries regarding this matter, please contact us at [info.CoC@guilfordcountync.gov](mailto:info.CoC@guilfordcountync.gov)

Best regards,

The Guilford County CoC Lead/CA Team

## HOUSING FIRST ASSESSMENT

GRANTEE: The Servant Center

DATE: 3/4/2024

GRANT #: NC0205L4F042209

GRANT PERIOD: 2023

PROJECT NAME: Glenwood Housing II Renewal 2022 PROJECT TYPE: Permanent Supportive Housing

### **INTRODUCTION and INSTRUCTIONS**

The NC 504 Housing First Assessment Tool is designed to assist Continuum of Care funded agency Directors, project staff, and the CoC, conduct a compliance and regulatory review of assisted projects and help agencies prepare for monitoring.

Agency staff should complete the Housing First Assessment Tool below and return the completed document via email to [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) no later than Monday, April 1, 2024 at 5:00PM. **Additionally, please include a complete copy of the Agency's Operations/Project Manual and Intake Packet with the completed assessment for each of the Grantee's funded projects.**

Use of the Housing First Assessment Tool may generate questions from Grantees, identify gaps in policies and procedures, or highlight an agency's best practices beyond HUD or the CoC's requirements. While the CoC Collaborative Applicant is required to monitor Grantees, the use of the Housing First Assessment Tool and the subsequent debriefing meeting is intended to inform and assist Grantees maintain contract compliance and adherence to Housing First in all CoC funded projects and programs.

Both the CoC Collaborative Applicant and support staff are available to answer questions, provide resources, and assist each agency or assigned staff member in this process. Please do not hesitate to reach out with questions, comments, or concerns.

Thank you,

The Guilford County Continuum of Care Collaborative Applicant Team

HOUSING FIRST ASSESSMENT	YES	NO	COMMENTS/DOCUMENTATION
The Grantee follows a "Housing First" approach that is documented in the agency operating policies and procedures and intake documents?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	GH is a low barrier program for veterans exiting homelessness w/disabilities.
The Grantee quickly moves participants into housing from the referral from the Coordinated Entry System?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	GH accepts veterans, as a preference from the veteran by-name list.
The Grantees' Programs or projects that cannot serve someone referred through coordinated entry (CE), work through the	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We only take referrals at the meetings if we have openings. So, we would not typically get referrals

CE process to ensure that those individuals or families have access to housing and services elsewhere?			if we could not serve someone. If that did occur, we would refer them back to CE or other community services so they can be assisted.
Are people with disabilities offered clear opportunities to request reasonable accommodations within applications, screening processes, and during tenancy, that accommodate disabilities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Yes, residents can request accommodations at any time.
The Grantee complies with HUD Equal Access and Gender Identity final Rule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Glenwood House complies with the Equal Access and Gender Identity rule.
The Grantee ensures that program participants are not screened out based on the following:	<input type="checkbox"/>	<input type="checkbox"/>	<a href="#">Click here to enter text.</a>
a. Having too little or no income.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is no requirement to have income.
b. Active or history of substance and/or alcohol abuse.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We routinely accept clients who are still struggling with addiction.
c. Having a criminal record/justice involvement.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We screen for sex offenders only because of our proximity to local day care centers.
d. History of domestic violence (e.g. lack of protective/restraining order, period of separation from abuser, or law enforcement involvement).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We do not screen out tenants due to a history of DV.
Does the Grantee ensure that project participants are not terminated from the program for the following reasons?	<input type="checkbox"/>	<input type="checkbox"/>	<a href="#">Click here to enter text.</a>
a. Failure to participate in supportive services.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Participation if voluntary.
b. Failure to make progress on a service plan.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<a href="#">Click here to enter text.</a>
c. Loss of income or failure to improve income.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<a href="#">Click here to enter text.</a>
d. Being a victim of domestic violence.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<a href="#">Click here to enter text.</a>
e. Active substance and/or alcohol abuse, in and of itself, without other lease violations, is not basis for termination and/or eviction.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<a href="#">Click here to enter text.</a>
Project participants are provided with written information at intake regarding their rights and responsibilities as	Yes		

tenants/participants, including the causes for project termination or eviction.			
Voluntary supportive services offered to project participants emphasize engagement and problem-solving over therapeutic goals.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
Participation in services or compliance with service plans are not conditions of tenancy, but are reviewed with project participants and regularly offered as a resource to those who may want to choose to engage in services at another time.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
Services are informed by a 'harm-reduction' philosophy that recognizes that drug and alcohol use and addiction are a part of some program participant's lives.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
Project participants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Project participants in supportive housing are given reasonable flexibility in paying their portion of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Case Management staff are notified immediately if a resident does not pay rent so they can put them on a payment plan. For those that still struggle, we will help them secure a payee if they are willing.
The Grantee makes every effort to secure and maintain units for project participants, even if they leave their units due to illness, incarceration, in-patient treatment or any other temporary stay away from the unit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
Every effort is made to provide project participants the opportunity to transfer from one housing situation, program, or project to another if a tenancy is in jeopardy or the household requires more appropriate support to maintain housing.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	This happens occasionally where we will need to assist a resident in moving to a nursing home or assisted living facility when they can no longer care for themselves.





## GUILFORD COUNTY CONTINUUM OF CARE

Working to End Homelessness in Guilford County

July 12<sup>th</sup>, 2024

Re: Housing First Assessment  
The Servant Center  
Shanna Reece, Executive Director  
1417 Glennwood Ave  
Greensboro, NC 27403

Thank you for submitting your Housing First Assessment on March 21<sup>st</sup>, 2024. We appreciate the committed work your agency offers while serving the most vulnerable in our community, and your intention to serve those that are experiencing homelessness. As you continue to support the community, please make note of the following items below to incorporate into your Policies and Procedures. The items noted during this assessment period for observation and recommendations are:

### Observations:

- There is no statement on “Housing First”. While your agency appears to follow the Housing First model, there was no verbiage or reference to the model within the supplemental documents you provided.
- Regarding supportive services, your agency’s response to the question was “Yes” with a comment “Participation if voluntary”, which was inconsistent with the language found in your program handbook. Specifically, your handbook states “life skills classes and other groups are **required**.” “Meetings **required** for ALL Servant House Residents”, “These classes are **mandatory** unless prior approval has been given not to attend a specific class.”

### Recommendations:

- It is suggested that your agency ensure that all language is consistent throughout the entire document regarding Housing First Model best practices.
- 

If you have any additional inquiries about this matter, please feel free to contact the CoC Team at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) . Also included is Housing First information for your agency’s reference. Thank you for being a great partner in this Housing First process this year.

Guilford County Collaborative Applicant/CoC Lead Team

Enclosures: Housing First in Permanent Supportive Housing, Housing First and Housing First Checklist.

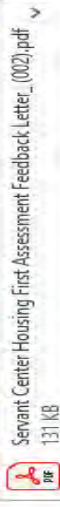
## Housing First Assessment Follow-up



InfoCoC

To: Shanna Reese

Cc: Chen Neal, Maria Lyons-Legrande, Makayla Glover, Rykiell Turner



Servant Center Housing First Assessment Feedback Letter\_ (002).pdf

131 KB



Mon 7/15/2024 2:51 PM

Good afternoon,

Thank you for submitting your Housing First Assessment. We appreciate the committed work your agency offers while serving the most vulnerable in our community, and your intention to serve those that are experiencing homelessness. Please see attached the feedback letter.

If you need further clarification or technical assistance, please contact us at [infococ@guilfordcountync.gov](mailto:infococ@guilfordcountync.gov).

Best regards,

The Guilford County CoC Lead/CA Team

**NC 504 2024 NOFO Scorecard**

<b>Agency Name:</b>
---------------------

Project Information	
<b>Project Name:</b>	
<b>Project Type:</b>	
<b>Agency's Funding Request:</b>	
<b>Funding Recommendation by Reviewer:</b>	
	<b>Housing First Points Awarded</b>
	<b>Project Application Points Awarded</b>
	<b>Total Points</b>

Project Expansion Applications Only (Not Scored/Informational Only)	
Is this a 'Project Expansion' of a an eligible renewal project? (Project Application Screen 3C, Question 1)	Yes/No
Will this project increase the number of program participants? (Project Application: Screen 3C, Question 2)	Yes/No
Will this project provide additional supportive services to program participants? (Project Application: Screen 3C, Question 3)	Yes/No
Will this project bring existing facilities up to government health or safety standards? (Project Application: Screen 3C, Question 4)	Yes/No

New Project Funding Type	Select Type (place 'X' in appropriate row)
Bonus (TH/RRH, RRH, PSH, or SSO-CE)	
DV Bonus (TH/RRH, RRH, or SSO-CE)	
New Project created through reallocated funds (any project type)	

**NC 504 New Scorecard - Housing First**

Housing First	Source of Information	Allowable Points	Points Received	Comments
Does the project quickly move participants into permanent housing?	Project Application: Housing First, Question 3B-5a	If YES = 5 points If NO = 0 points		
Does the project screen out program participants who have the following barriers? [Having too little or little income, Active substance use or history of substance use, Untreated mental health concerns, Having a criminal record except for state-mandated exceptions, History of victimization (e.g., domestic violence, sexual assault, childhood abuse)]	Project Application: Housing First, Question 3B-5b	If none of the above checked = 0 points All other boxes/items checked = 5 points		
Will the project terminate program participants for any of the following reasons? [Failure to participate in supportive services, Failure to make progress on a service plan, Loss of income or failure to increase income, or any other activity not covered in a lease agreement, typically found for unassisted persons in the project's geographic area]	Project Application: Housing First, Question 3B-5c	If none of the above checked = 0 points All other boxes/items checked = 5 points		
Does the project follow a Housing First Approach?	Project Application: Housing First, Question 3B-5d	If YES = 5 points If NO = 0 points		
Does the agency's policies and procedures comport to the Housing First Approach regulation?	NC 504 Housing First Assessment Report; Supplemental Information - Housing First Assessment (New Applicants Only)	If YES = 5 points If NO = 0 points		
Did the agency submit all of the required documents for the Housing First Assessment?	NC 504 Housing First Assessment Report; Supplemental Information - Housing First Assessment (New Applicants Only)	If YES = 5 points If NO = 0 points		
Did the agency complete the Housing First Assessment checklist?	NC 504 Housing First Assessment Report; Supplemental Information - Housing First Assessment (New Applicants Only)	If YES = 5 points If NO = 0 points		
<b>TOTAL ALLOWABLE POINTS</b>		<b>35</b>		
<b>REVIEWER TOTAL</b>			<b>0</b>	

NC 504 New Scorecard - PSH

Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in effectively utilizing federal funds and performing the activities proposed in the application?	Project Application: Screen 2B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in leveraging Federal, State, local and private sector funds?	Project Application: Screen 2B, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) financial management?	Project Application: Screen 2B, Question 3	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Are there any unresolved HUD monitoring or OIG audit findings for any HUD grants (including ESG) under the organization?	Project Application: Screen 2B, Question 4	If YES = enter negative ten (-10) points If NO = 10 points		
Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: Screen 2B, Question 4a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
Project Information	Source of Information	Allowable Points	Points Received	Comments
Will funds requested in this new project application replace state or local government funds (24 CFR 578.87 (a))?	Project Application: Screen 3A, Question 8	If YES = 0 points If NO = 5 points		
Is your organization, or subrecipient, a victim service provider as defined in 24 CFR 578.3?	Project Application: Screen 3A, Question 7	For Information Purposes Only		
Did the applicant agency provide a description that addresses the entire scope of the proposed project?	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency provide a timeline for rapid implementation for the proposed project in the chart from the date of the execution of the grant agreement?	Project Application: Screen 3B, Question 2	Timeline Does Not Address Expectations: 0 Timeline Minimally Addresses Expectations: 2.5 Timeline Adequately Addresses Expectations: 5 Timeline Exceeds Expectations: 10		
Did the applicant agency identify all populations they intend to serve?	Project Application: Screen 3B, Question 3	For Information Purposes Only		
Will the project engage/ be involved in the CoC's Coordinated Entry Process or if a victim service provider, will they use an alternate Coordinated Entry Process that follows HUD's guidelines?	Project Application: Screen 3B, Question 4	If YES = 10 points If NO = 0 points		
Will the program participants be required to live in a specific structure, unit, or locality at any time while in the program?	Project Application: Screen 3B, Question 6	If YES = 0 points If NO = 5 points		
Is this project 100% Dedicated or Dedicated/Dedicated PLUS? (definitions are under question)	Project Application: Screen 3B, Question 8	For Information Purposes Only		
Does the applicant agency participate in the CoC?	NC 504 CoC meeting, subcommittee, and workgroup attendance logs (supplemental information)	Does not participate: 0 Membership pending and/or minimally participates 25%-50% in meetings, workgroups, etc.: 2.5 Participates in 51%-75% in meetings, workgroups, etc.: 5 Participates in more than 75% in meetings, workgroups, etc.: 10		

**NC 504 New Scorecard - PSH**

<b>Supportive Services for Program Participants</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the applicant agency describe how program participants will be assisted to obtain and remain in permanent housing?	Project Application: Screen 4A, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the specific plan to coordinate and integrate with other mainstream health, social services, and employment programs for which program participants may be eligible?	Project Application: Screen 4A, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency indicate who will provide the supportive services and how often they will be provided?	Project Application: Screen 4A, Question 3 (Chart)	If YES = 5 points If NO = 0 points		
Did this project include transportation assistance to program participants to attend mainstream benefit appointments, employment training, or jobs?	Project Application: Screen 4A, Question 4	If YES = 5 points If NO = 0 points		
Did this project include an annual follow-up with program participants to ensure mainstream benefits are received and renewed?	Project Application: Screen 4A, Question 5	If YES = 5 points If NO = 0 points		
Will program participants have access to SSI/SSDI technical assistance provided by the project applicant, subrecipient, or partner agency?	Project Application: Screen 4A, Question 6	If YES = 5 points If NO = 0 points		
Has the staff person providing the technical assistance completed SOAR training in the past 24 months?	Project Application Screen 4A, Question 6a	If YES = 5 points If NO = 0 points		
<b>Housing Type and Location</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the agency specify the housing type/structures including maximum number of Units and Beds available for program participants at the selected housing site?	Project Application Screen 4B Question 1 and 2	Yes =10 No = 0		
Applicant agency reported a higher number of units and beds than the number of households (units), and persons (beds) entered on Screen 5A and Screen 5B.	Project Application: Screen 4B, Question 2a-2b should correlate with Screen 5A and 5B	If Yes = 0 points If No = 10 points		
Will more than 16 persons live in a single structure?	Project Application: Screen 3B, Question 7	If YES = enter negative ten (-10) points If NO = 10 points		
Did the project narrative in Question 7, describe the local market conditions that necessitate a project of this size.	Project Application: Screen 3B, Question 7a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
Did the project narrative in Question 7, describe how the project will be integrated into the neighborhood.	Project Application: Screen 3B, Question 7b	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
<b>Funding Request</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Will it be feasible for the project to be under grant agreement by September 15, 2026?	Project Application: Screen 6A. Funding Request, Question 1	If YES = 5 points If NO = 0 points (Project ineligible to apply)		
Applicant agency selected a grant term of 1-year term and a initial term of nor more than 12-months?	Project Application: Screen 6A. Funding Request, Question 4 and 6	If YES = 5 points If NO = 0 points		
Does the overall cost in each budget line item seem reasonable for the full scope of the project proposed? (Unit cost/ Bed cost are based on FMR.)	Project Application: Part 6 and Summary Budget	If YES = 10 points If NO = 0 points		
Did the applicant agency document required match of no less that 25% of total assistance requested for this project (excluding leasing costs)?	Project Application: Screen 6i	If YES = 10 points If NO = 0 points		

NC 504 New Scorecard - PSH

Inclusion Initiatives	Source of Information	Allowable Points	Points Received	Comments
<b>Racial Equity &amp; Inclusion:</b> Agency includes Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities on its Board of Directors, Board Subcommittees or advisory/program planning groups and has clear methods for receiving input from these communities.	Board of Directors List, NC 504 Supplemental Information	If YES = 10 points If NO = 0 points		
<b>Racial Equity &amp; Inclusion:</b> Agency Board, leadership, and staff have demonstrated efforts to analyze and identify barriers that result in differences in service delivery/outcomes for Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities, have reviewed or revised policies, or received training/technical assistance to improve service delivery.	NC 504 Supplemental Information, Agency Training Logs	If YES = 10 points If NO = 0 points		
<b>Improving Assistance to LGBTQ+:</b> Agency has clear policies to ensure respect, safety, and access to programs and services for LGBTQ+, transgender, gender non-confirming, and non-binary individuals and households.	NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy	If YES = 10 points If NO = 0 points		
<b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency includes persons with lived experience/expertise on its Board of Directors, has clear methods for receiving input from persons with lived experience/expertise. Agency details on how it acts on such input. Agency includes persons with lived experience/expertise in program planning and/or implementation.	Board of Directors List and NC 504 Supplemental Information	If YES = 10 points If NO = 0 points		
<b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency leadership and staff is diverse, representative of the persons it intends to serve, and includes persons with lived experience/expertise in program planning, service delivery and/or program administration.	Organizational Staff list and NC 504 Supplemental Information	If YES = 10 points If NO = 0 points		
<b>Violence Against Women Act (VAWA):</b> Agency has clear policies to ensure confidentiality and compliance with the VAWA, which is a federal law that, in part, provides protections for persons who have experienced domestic violence, dating violence, sexual assault, or stalking, or other unsafe conditions to reduce their likelihood of experiencing homelessness.	Agency Policies and Procedures and NC 504 Supplemental Information	If YES = 10 points If NO = 0 points		
<b>TOTAL ALLOWABLE POINTS</b>		<b>255</b>		
<b>REVIEWER TOTAL</b>			<b>0</b>	

**NC 504 New Scorecard - RRH**

Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in effectively utilizing federal funds and performing the activities proposed in the application?	Project Application: Screen 2B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in leveraging Federal, State, local and private sector funds?	Project Application: Screen 2B, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) financial management?	Project Application: Screen 2B, Question 3	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Are there any unresolved HUD monitoring or OIG audit findings for any HUD grants (including ESG) under the organization?	Project Application: Screen 2B, Question 4	If YES = enter negative ten (-10) points If NO = 10 points		
Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: Screen 2B, Question 4a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
Project Information	Source of Information	Allowable Points	Points Received	Comments
Will funds requested in this new project application replace state or local government funds (24 CFR 578.87 (a))?	Project Application: Screen 3A, Question 8	If YES = 0 points If NO = 5 points		
Is your organization, or subrecipient, a victim service provider as defined in 24 CFR 578.3?	Project Application: Screen 3A, Question 7	For Information Purposes Only		
Did the applicant agency provide a description that addresses the entire scope of the proposed project?	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency provide a timeline for rapid implementation for the proposed project in the chart from the date of the execution of the grant agreement?	Project Application: Screen 3B, Question 2	Timeline Does Not Address Expectations: 0 Timeline Minimally Addresses Expectations: 2.5 Timeline Adequately Addresses Expectations: 5 Timeline Exceeds Expectations: 10		
Did the applicant agency identify all populations they intend to serve?	Project Application: Screen 3B, Question 3	For Information Purposes Only		
Will the project engage/ be involved in the CoC's Coordinated Entry Process or if a victim service provider, will they use an alternate Coordinated Entry Process that follows HUD's guidelines?	Project Application: Screen 3B, Question 4	If YES = 10 points If NO = 0 points		
Will the program participants be required to live in a specific structure, unit, or locality at any time while in the program?	Project Application: Screen 3B, Question 6	If YES = 0 points If NO = 5 points		
Does the applicant agency participate in the CoC?	NC 504 CoC meeting, subcommittee, and workgroup attendance logs (supplemental information)	Does not participate: 0 Membership pending and/or minimally participates 25%-50% in meetings, workgroups, etc.: 2.5 Participates in 51%-75% in meetings, workgroups, etc.: 5 Participates in more than 75% in meetings, workgroups, etc.: 10		



**NC 504 New Scorecard - RRH**

<b>Supportive Services for Program Participants</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the applicant agency describe how program participants will be assisted to obtain and remain in permanent housing?	Project Application: Screen 4A, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the specific plan to coordinate and integrate with other mainstream health, social services, and employment programs for which program participants may be eligible?	Project Application: Screen 4A, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency indicate who will provide the supportive services and how often they will be provided?	Project Application: Screen 4A, Question 3 (Chart)	If YES = 10 points If NO = 0 points		
Did this project include transportation assistance to program participants to attend mainstream benefit appointments, employment training, or jobs?	Project Application: Screen 4A, Question 4	If YES = 5 points If NO = 0 points		
Did this project include an annual follow-up with program participants to ensure mainstream benefits are received and renewed?	Project Application: Screen 4A, Question 5	If YES = 5 points If NO = 0 points		
Will program participants have access to SSI/SSDI technical assistance provided by the project applicant, subrecipient, or partner agency?	Project Application: Screen 4A, Question 6	If YES = 5 points If NO = 0 points		
Has the staff person providing the technical assistance completed SOAR training in the past 24 months?	Project Application Screen 4A, Question 6a	If YES = 5 points If NO = 0 points		
<b>Housing Type and Location</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the agency specify the housing type/structures including maximum number of Units and Beds available for program participants at the selected housing site?	Project Application Screen 4B Question 1 and 2	Yes = 10 No = 0		
Applicant agency reported a higher number of units and beds than the number of households (units), and persons (beds) entered on Screen 5A and Screen 5B.	Project Application: Screen 4B, Question 2a-2b should correlate with Screen 5A and 5B	If Yes = 0 points If No = 10 points		
Will more than 16 persons live in a single structure?	Project Application: Screen 3B, Question 7	If YES = enter negative ten (-10) points If NO = 10 points		
Did the project narrative in Question 7, describe the local market conditions that necessitate a project of this size.	Project Application: Screen 3B, Question 7a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
Did the project narrative in Question 7, describe how the project will be integrated into the neighborhood.	Project Application: Screen 3B, Question 7b	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
<b>Funding Request</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Will it be feasible for the project to be under grant agreement by September 15, 2026?	Project Application: Screen 6A, Funding Request, Question 1	If YES = 5 points If NO = 0 points (Project ineligible to apply)		

**NC 504 New Scorecard - RRH**

Applicant agency selected a grant term of 1-year term and a initial term of nor more than 12-months?	Project Application: Screen 6A. Funding Request, Question 4 and 6	If YES = 5 points If NO = 0 points		
Does the overall cost in each budget line item seem reasonable for the full scope of the project proposed? (Unit cost/ Bed cost are based on FMR.)	Project Application: Part 6 and Summary Budget	If YES = 10 points If NO = 0 points		
Did the applicant agency document required match of no less than 25% of total assistance requested for this project (excluding leasing costs)?	Project Application: Screen 6I	If YES = 10 points If NO = 0 points		
<b>Inclusion Initiatives</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
<b>Racial Equity &amp; Inclusion:</b> Agency includes Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities on its Board of Directors, Board Subcommittees or advisory/program planning groups and has clear methods for receiving input from these communities.	Board of Directors List, NC 504 Supplemental Information	If YES = 10 points If NO = 0 points		
<b>Racial Equity &amp; Inclusion:</b> Agency Board, leadership, and staff have demonstrated efforts to analyze and identify barriers that result in differences in service delivery/outcomes for Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities, have reviewed or revised policies, or received training/technical assistance to improve service delivery.	NC 504 Supplemental Information, Agency Training Logs	If YES = 10 points If NO = 0 points		
<b>Improving Assistance to LGBTQ+:</b> Agency has clear policies to ensure respect, safety, and access to programs and services for LGBTQ+, transgender, gender non-confirming, and non-binary individuals and households.	NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy	If YES = 10 points If NO = 0 points		
<b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency includes persons with lived experience/expertise on its Board of Directors, has clear methods for receiving input from persons with lived experience/expertise. Agency details on how it acts on such input. Agency includes persons with lived experience/expertise in program planning and/or implementation.	Board of Directors List and NC 504 Supplemental Information	If YES = 10 points If NO = 0 points		
<b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency leadership and staff is diverse, representative of the persons it intends to serve, and includes persons with lived experience/expertise in program planning, service delivery and/or program administration.	Organizational Staff list and NC 504 Supplemental Information	If YES = 10 points If NO = 0 points		
<b>Violence Against Women Act (VAWA):</b> Agency has clear policies to ensure confidentiality and compliance with the VAWA, which is a federal law that, in part, provides protections for persons who have experienced domestic violence, dating violence, sexual assault, or stalking, or other unsafe conditions to reduce their likelihood of experiencing homelessness.	Agency Policies and Procedures and NC 504 Supplemental Information	If YES = 10 points If NO = 0 points		
<b>TOTAL ALLOWABLE POINTS</b>		<b>255</b>		
<b>REVIEWER TOTAL</b>			<b>0</b>	

NC 504 New Scorecard - TH/RRH

Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in effectively utilizing federal funds and performing the activities proposed in the application?	Project Application: Screen 2B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in leveraging Federal, State, local and private sector funds?	Project Application: Screen 2B, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) financial management?	Project Application: Screen 2B, Question 3	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Are there any unresolved HUD monitoring or OIG audit findings for any HUD grants (including ESG) under the organization?	Project Application: Screen 2B, Question 4	If YES = enter negative ten (-10) points If NO = 10 points		
Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: Screen 2B, Question 4a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
Project Information	Source of Information	Allowable Points	Points Received	Comments
Will funds requested in this new project application replace state or local government funds (24 CFR 578.87 (a))?	Project Application: Screen 3A, Question 8	If YES = 0 points If NO = 5 points		
Is your organization, or subrecipient, a victim service provider as defined in 24 CFR 578.3?	Project Application: Screen 3A, Question 7	For Information Purposes Only		
Did the applicant agency provide a description that addresses the entire scope of the proposed project?	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency provide a timeline for rapid implementation for the proposed project in the chart from the date of the execution of the grant agreement?	Project Application: Screen 3B, Question 2	Timeline Does Not Address Expectations: 0 Timeline Minimally Addresses Expectations:2.5 Timeline Adequately Addresses Expectations:5 Timeline Exceeds Expectations: 10		
Did the applicant agency identify all populations they intend to serve?	Project Application: Screen 3B, Question 3	For Information Purposes Only	0	
Will the project engage/ be involved in the CoC's Coordinated Entry Process or if a victim service provider, will they use an alternate Coordinated Entry Process that follows HUD's guidelines?	Project Application: Screen 3B, Question 4	If YES = 10 points If NO = 0 points		
Will the program participants be required to live in a specific structure, unit, or locality at any time while in the program?	Project Application: Screen 3B, Question 6	If YES = 0 points If NO = 5 points		

NC 504 New Scorecard - TH/RRH

Does the applicant agency participate in the CoC?	NC 504 CoC meeting, subcommittee, and workgroup attendance logs (supplemental information)	Does not participate: 0 Membership pending and/or minimally participates 25%-50% in meetings, workgroups, etc.: 2.5 Participates in 51%-75% in meetings, workgroups, etc.: 5 Participates in more than 75% in meetings, workgroups, etc.: 10		
<b>Supportive Services for Program Participants</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the applicant agency describe how program participants will be assisted to obtain and remain in permanent housing?	Project Application: Screen 4A, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the specific plan to coordinate and integrate with other mainstream health, social services, and employment programs for which program participants may be eligible?	Project Application: Screen 4A, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency indicate who will provide the supportive services and how often they will be provided?	Project Application: Screen 4A, Question 3 (Chart)	If YES = 10 points If NO = 0 points		
Did this project include transportation assistance to program participants to attend mainstream benefit appointments, employment training, or jobs?	Project Application: Screen 4A, Question 4	If YES = 5 points If NO = 0 points		
Did this project include an annual follow-up with program participants to ensure mainstream benefits are received and renewed?	Project Application: Screen 4A, Question 5	If YES = 5 points If NO = 0 points		
Will program participants have access to SSI/SSDI technical assistance provided by the project applicant, subrecipient, or partner agency?	Project Application: Screen 4A, Question 6	If YES = 5 points If NO = 0 points		
Has the staff person providing the technical assistance completed SOAR training in the past 24 months?	Project Application Screen 4A, Question 6a	If YES = 5 points If NO = 0 points		
<b>Housing Type and Location</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the applicant agency provide the funding source for all units and beds available (transitional and/or rapid rehousing) for program participants at the selected housing type and location? <i>To ensure capacity to meet this requirement, the CoC Program requires that Joint TH and PH-RRH applications propose at least twice as many PH-RRH units &amp; beds as TH units &amp; beds.</i>	Project Application: Screen 4B, Question 3 and 4	Meets CoC program requirements = 10 points Does not meet CoC program requirements = 0 points		
Did the agency specify the housing type/structures including maximum number of Units and Beds available for program participants at the selected housing site?	Project Application Screen 4B Question 2 and 4	Yes = 5 No = 0		
Applicant agency reported a higher number of units and beds than the number of households (units), and persons (beds) entered on Screen 5A and Screen 5B.	Project Application: Screen 4B, Question 2a-2b should correlate with Screen 5A and 5B	If Yes = 0 points If No = 5 points		
Will more than 16 persons live in a single structure?	Project Application: Screen 3B, Question 7	If YES = enter negative ten (-10) points If NO = 10 points		

**NC 504 New Scorecard - TH/RRH**

Did the project narrative in Question 7, describe the local market conditions that necessitate a project of this size.	Project Application: Screen 3B, Question 7a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
Did the project narrative in Question 7, describe how the project will be integrated into the neighborhood.	Project Application: Screen 3B, Question 7b	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
<b>Funding Request</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Will it be feasible for the project to be under grant agreement by September 15, 2026?	Project Application: Screen 6A. Funding Request, Question 1	If YES = 5 points If NO = 0 points (Project ineligible to apply)		
Applicant agency selected a grant term of 1-year term and a initial term of nor more than 12-months?	Project Application: Screen 6A. Funding Request, Question 4 and 6	If YES = 5 points If NO = 0 points		
Does the overall cost in each budget line item seem reasonable for the full scope of the project proposed? (Unit cost/ Bed cost are based on FMR.)	Project Application: Part 6 and Summary Budget	If YES = 10 points If NO = 0 points		
Did the applicant agency document required match of no less than 25% of total assistance requested for this project (excluding leasing costs)?	Project Application: Screen 6I	If YES = 10 points If NO = 0 points		
<b>Inclusion Initiatives</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
<b>Racial Equity &amp; Inclusion:</b> Agency includes Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities on its Board of Directors, Board Subcommittees or advisory/program planning groups and has clear methods for receiving input from these communities.	Board of Directors List, NC 504 Supplemental Information	If YES = 10 points If NO = 0 points		
<b>Racial Equity &amp; Inclusion:</b> Agency Board, leadership, and staff have demonstrated efforts to analyze and identify barriers that result in differences in service delivery/outcomes for Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities, have reviewed or revised policies, or received training/technical assistance to improve service delivery.	NC 504 Supplemental Information, Agency Training Logs	If YES = 10 points If NO = 0 points		
<b>Improving Assistance to LGBTQ+:</b> Agency has clear policies to ensure respect, safety, and access to programs and services for LGBTQ+, transgender, gender non-confirming, and non-binary individuals and households.	NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy	If YES = 10 points If NO = 0 points		
<b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency includes persons with lived experience/expertise on its Board of Directors, has clear methods for receiving input from persons with lived experience/expertise. Agency details on how it acts on such input. Agency includes persons with lived experience/expertise in program planning and/or implementation.	Board of Directors List and NC 504 Supplemental Information	If YES = 10 points If NO = 0 points		

**NC 504 New Scorecard - TH/RRH**

<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency leadership and staff is diverse, representative of the persons it intends to serve, and includes persons with lived experience/expertise in program planning, service delivery and/or program administration.</p>	<p>Organizational Staff list and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Violence Against Women Act (VAWA):</b> Agency has clear policies to ensure confidentiality and compliance with the VAWA, which is a federal law that, in part, provides protections for persons who have experienced domestic violence, dating violence, sexual assault, or stalking, or other unsafe conditions to reduce their likelihood of experiencing homelessness.</p>	<p>Agency Policies and Procedures and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p align="center"><b>TOTAL ALLOWABLE POINTS</b></p>		<p align="center"><b>255</b></p>		
<p align="center"><b>REVIEWER TOTAL</b></p>			<p align="center"><b>0</b></p>	

NC 504 New Scorecard - SSO-CE

Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in effectively utilizing federal funds and performing the activities proposed in the application?	Project Application: Screen 2B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in leveraging Federal, State, local and private sector funds?	Project Application: Screen 2B, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) financial management?	Project Application: Screen 2B, Question 3	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Are there any unresolved HUD monitoring or OIG audit findings for any HUD grants (including ESG) under the organization?	Project Application: Screen 2B, Question 4	If YES = enter negative ten (-10) points If NO = 10 points		
Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: Screen 2B, Question 4a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
Project Information	Source of Information	Allowable Points	Points Received	Comments
Will funds requested in this new project application replace state or local government funds (24 CFR 578.87 (a))?	Project Application: Screen 3A, Question 8	If YES = 0 points If NO = 5 points		
Is your organization, or subrecipient, a victim service provider as defined in 24 CFR 578.3?	Project Application: Screen 3A, Question 7	For Informational Purposes Only		
Did the applicant agency provide a description that addresses the entire scope of the proposed project?	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency provide a timeline for rapid implementation for the proposed project in the chart from the date of the execution of the grant agreement?	Project Application: Screen 3B, Question 2	Timeline Does Not Address Expectations: 0 Timeline Minimally Addresses Expectations: 2.5 Timeline Adequately Addresses Expectations: 5 Timeline Exceeds Expectations: 10		
Did the applicant agency identify all populations they intend to serve?	Project Application: Screen 3B, Question 3	For Informational Purposes Only		
Will the coordinated entry process cover the CoC's entire geographic area?	Project Application: Screen 3B, Question 4a	If YES = 15 points If NO = 0 points		

**NC 504 New Scorecard - SSO-CE**

Will the coordinated entry process be affirmatively marketed and easily accessible by individuals and families seeking assistance?	Project Application: Screen 3B, Question 4b	If YES = 15 points If NO = 0 points		
Did the applicant agency provide details of the advertisement strategy for the coordinated entry process and how it is designed to reach those with the highest barriers to accessing assistance?	Project Application: Screen 3B, Question 4c	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 5 Adequately Addresses Expectations/Requirements: 10 Exceeds Expectations/Requirements: 15		
Does the coordinated entry process use a comprehensive, standardized assessment process?	Project Application: Screen 3B, Question 4d	If YES = 15 points If NO = 0 points		
Did the applicant agency provide details of the referral process and how the coordinated entry process ensures program participants are directed to appropriate housing and services?	Project Application: Screen 3B, Question 4e	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 5 Adequately Addresses Expectations/Requirements: 10 Exceeds Expectations/Requirements: 15		
If the coordinated entry process includes differences in access, entry, assessment, or referral for certain subpopulations, are those differences limited only to the following five groups?: (1) adults without children, (2) adults accompanied by children, (3) unaccompanied youth, (4) households fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions (including human trafficking), and (5) persons at risk of homelessness?	Project Application: Screen 3B, Question 4f	If YES = 15 points If NO = 0 points		
Does the applicant agency participate in the CoC?	NC 504 CoC meeting, subcommittee, and workgroup attendance logs (supplemental information)	Does not participate: 0 Membership pending and/or minimally participates 25%-50% in meetings, workgroups, etc.:2.5 Participates in 51%-75% in meetings, workgroups, etc.: 5 Participates in more than 75% in meetings, workgroups, etc.: 10		
<b>Funding Request</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Will it be feasible for the project to be under grant agreement by September 15, 2026?	Project Application: Screen 6A. Funding Request, Question 1	If YES = 5 points If NO = 0 points (Project ineligible to apply)		
Applicant agency selected a grant term of 1-year term and a initial term of nor more than 12-months?	Project Application: Screen 6A. Funding Request, Question 4 and 6	If YES = 5 points If NO = 0 points		
Does the overall cost in each budget line item seem reasonable for the full scope of the project proposed? (Unit cost/ Bed cost are based on FMR.)	Project Application: Part 6 and Summary Budget	If YES = 10 points If NO = 0 points		
Did the applicant agency document required match of no less that 25% of total assistance requested for this project (excluding leasing costs)?	Project Application: Screen 6I	If YES = 10 points If NO = 0 points		
<b>Inclusion Initiatives</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
<b>Racial Equity &amp; Inclusion:</b> Agency includes Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities on its Board of Directors, Board Subcommittees or advisory/program planning groups and has clear methods for receiving input from these communities.	Board of Directors List, NC 504 Supplemental Information	If YES = 10 points If NO = 0 points		



**NC 504 New Scorecard - SSO-CE**

<p><b>Racial Equity &amp; Inclusion:</b> Agency Board, leadership, and staff have demonstrated efforts to analyze and identify barriers that result in differences in service delivery/outcomes for Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities, have reviewed or revised policies, or received training/technical assistance to improve service delivery.</p>	<p>NC 504 Supplemental Information, Agency Training Logs</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Improving Assistance to LGBTQ+:</b> Agency has clear policies to ensure respect, safety, and access to programs and services for LGBTQ+, transgender, gender non-confirming, and non-binary individuals and households.</p>	<p>NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency includes persons with lived experience/expertise on its Board of Directors, has clear methods for receiving input from persons with lived experience/expertise. Agency details on how it acts on such input. Agency includes persons with lived experience/expertise in program planning and/or implementation.</p>	<p>Board of Directors List and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency leadership and staff is diverse, representative of the persons it intends to serve, and includes persons with lived experience/expertise in program planning, service delivery and/or program administration.</p>	<p>Organizational Staff list and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Violence Against Women Act (VAWA):</b> Agency has clear policies to ensure confidentiality and compliance with the VAWA, which is a federal law that, in part, provides protections for persons who have experienced domestic violence, dating violence, sexual assault, or stalking, or other unsafe conditions to reduce their likelihood of experiencing homelessness.</p>	<p>Agency Policies and Procedures and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<b>TOTAL ALLOWABLE POINTS</b>		<b>255</b>		
<b>REVIEWER TOTAL</b>			<b>0</b>	

**NC 504 New Scorecard - HMIS**

Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in effectively utilizing federal funds and performing the activities proposed in the application?	Project Application: Screen 2B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in leveraging Federal, State, local and private sector funds?	Project Application: Screen 2B, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s), if applicable) financial management?	Project Application: Screen 2B, Question 3	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Are there any unresolved HUD monitoring or OIG audit findings for any HUD grants (including ESG) under the organization?	Project Application: Screen 2B, Question 4	If YES = enter negative ten (-10) points If NO = 10 points		
Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: Screen 2B, Question 4a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
Project Information	Source of Information	Allowable Points	Points Received	Comments
Will funds requested in this new project application replace state or local government funds (24 CFR 578.87 (a))?	Project Application: Screen 3A, Question 8	If YES = 0 points If NO = 5 points		
Is your organization, or subrecipient, a victim service provider as defined in 24 CFR 578.3?	Project Application: Screen 3A, Question 7	For Information Purposes Only		
Did the applicant agency provide a description that addresses the entire scope of the proposed project?	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		

**NC 504 New Scorecard - HMIS**

<p>Did the applicant agency provide a timeline for rapid implementation for the proposed project in the chart from the date of the execution of the grant agreement?</p>	<p>Project Application: Screen 3B, Question 2</p>	<p>Timeline Does Not Address Expectations: 0                      Timeline Minimally Addresses Expectations:2.5                      Timeline Adequately Addresses Expectations:5                      Timeline Exceeds Expectations: 10</p>		
<p>Did the applicant agencies project increase HMIS functionality?</p>	<p>Project Application: Screen 3C, Question 2</p>	<p>If YES = 15 points                      If NO = 0 points</p>		
<p>Did applicant agency describe how expansion will increase HMIS functionality? (If yes to above question)</p>	<p>Project Application: Screen 3C, Question 2a</p>	<p>If NO to question 3C-2, N/A: 0                      Minimally Addresses Expectations/Requirements: 2.5                      Exceeds Expectations/Requirements: 5</p>		
<p>Will this project increase geographic coverage of HMIS?</p>	<p>Project Application: Screen 3C, Question 3</p>	<p>If YES = 15 points                      If NO = 0 points</p>		
<p>Will this project increase number of HMIS users in each of the following agencies.</p>	<p>Project Application: Screen 3C, Question 4</p>	<p>If YES = 15 points                      If NO = 0 points</p>		
<p>Does the applicant agency participate in the CoC?</p>	<p>NC 504 CoC meeting, subcommittee, and workgroup attendance logs (supplemental information)</p>	<p>Does not participate: 0                      Membership pending and/or minimally participates 25%-50% in meetings, workgroups, etc.:2.5                      Participates in 51%-75% in meetings, workgroups, etc.: 5                      Participates in more than 75% in meetings, workgroups, etc.: 10</p>		

**NC 504 New Scorecard - HMIS**

<b>Implementation of HMIS</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Is the HMIS currently programmed to collect all Universal Data Elements (UDEs) as set forth in the 2024 HMIS Data Standard Manual?	Project Application: Screen 4A, Question 1	If YES = 15 points If NO = 0 points		
Does HMIS produce all HUD-required reports and provide data needed for HUD reporting? (Details under question)	Project Application: Screen 4A, Question 2	If YES = 15 points If NO = 0 points		
Is the applicant agencies HMIS capable of generating all reports required by Federal partners including HUD, VA, and HHS?	Project Application: Screen 4A, Question 3	If YES = 15 points If NO = 0 points		
<b>Funding Request</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Will it be feasible for the project to be under grant agreement by September 15, 2026?	Project Application: Screen 6A. Funding Request, Question 1	If YES = 5 points If NO = 0 points (Project ineligible to apply)		
Applicant agency selected a grant term of 1-year term and a initial term of nor more than 12-months?	Project Application: Screen 6A. Funding Request, Question 4 and 6	If YES = 5 points If NO = 0 points		
Does the overall cost in each budget line item seem reasonable for the full scope of the project proposed? (Unit cost/ Bed cost are based on FMR.)	Project Application: Part 6 and Summary Budget	If YES = 10 points If NO = 0 points		
Did the applicant agency document required match of no less that 25% of total assistance requested for this project (excluding leasing costs)?	Project Application: Screen 6I	If YES = 10 points If NO = 0 points		
<b>Inclusion Initiatives</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
<b>Racial Equity &amp; Inclusion:</b> Agency includes Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities on its Board of Directors, Board Subcommittees or advisory/program planning groups and has clear methods for receiving input from these communities.	Board of Directors List, NC 504 Supplemental Information	If YES = 10 points If NO = 0 points		
<b>Racial Equity &amp; Inclusion:</b> Agency Board, leadership, and staff have demonstrated efforts to analyze and identify barriers that result in differences in service delivery/outcomes for Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities, have reviewed or revised policies, or received training/technical assistance to improve service delivery.	NC 504 Supplemental Information, Agency Training Logs	If YES = 10 points If NO = 0 points		
<b>Improving Assistance to LGBTQ+:</b> Agency has clear policies to ensure respect, safety, and access to programs and services for LGBTQ+, transgender, gender non-confirming, and non-binary individuals and households.	NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy	If YES = 10 points If NO = 0 points		

**NC 504 New Scorecard - HMIS**

<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency includes persons with lived experience/expertise on its Board of Directors, has clear methods for receiving input from persons with lived experience/expertise. Agency details on how it acts on such input. Agency includes persons with lived experience/expertise in program planning and/or implementation.</p>	<p align="center">Board of Directors List and NC 504 Supplemental Information</p>	<p align="center">If YES = 10 points If NO = 0 points</p>		
<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency leadership and staff is diverse, representative of the persons it intends to serve, and includes persons with lived experience/expertise in program planning, service delivery and/or program administration.</p>	<p align="center">Organizational Staff list and NC 504 Supplemental Information</p>	<p align="center">If YES = 10 points If NO = 0 points</p>		
<p><b>Violence Against Women Act (VAWA):</b> Agency has clear policies to ensure confidentiality and compliance with the VAWA, which is a federal law that, in part, provides protections for persons who have experienced domestic violence, dating violence, sexual assault, or stalking, or other unsafe conditions to reduce their likelihood of experiencing homelessness.</p>	<p align="center">Agency Policies and Procedures and NC 504 Supplemental Information</p>	<p align="center">If YES = 10 points If NO = 0 points</p>		
<p align="center"><b>TOTAL ALLOWABLE POINTS</b></p>		<p align="center"><b>255</b></p>		
<p align="center"><b>REVIEWER TOTAL</b></p>			<p align="center"><b>0</b></p>	

<b>Agency Name:</b>	
<b>Project Information</b>	
<b>Project Name:</b>	
<b>Project Type:</b>	
<b>Agency's Funding Request:</b>	
<b>Funding Recommendation by Reviewer:</b>	
<b>Housing First Points Awarded</b>	
<b>Project Application Points Awarded</b>	
<b>Total Points</b>	0

Is this renewal project application requesting to consolidate?  
 (All Project - Renewal Grant Consolidation or Renewal Grant Expansion Screen Q1)

Is this renewal project application requesting to expand?  
 (All Project - Renewal Grant Consolidation or Renewal Grant Expansion Screen Q1)

YES/NO

YES/NO; If yes; note new project grant name.

**NC 504 Renewal Scorecard - Housing First**

Housing First	Source of Information	Allowable Points	Points Received	Comments
Does the project quickly move participants into permanent housing?	Project Application: Housing First, Question 3B-5a	If YES = 5 points If NO = 0 points		
Does the project screen out program participants who have the following barriers? [Having too little or little income, Active substance use or history of substance use, Untreated mental health concerns, Having a criminal record except for state-mandated exceptions, History of victimization (e.g., domestic violence, sexual assault, childhood abuse)]	Project Application: Housing First, Question 3B-5b	If none of the above checked = 0 points All other boxes/items checked = 5 points		
Will the project terminate program participant for any of the following reasons? [Failure to participate in supportive services, Failure to make progress on a service plan, Loss of income or failure to increase income, or any other activity not covered in a lease agreement, typically found for unassisted persons in the project's geographic area]	Project Application: Housing First, Question 3B-5c	If none of the above checked = 0 points All other boxes/items checked = 5 points		
Does the project follow a Housing First Approach?	Project Application: Housing First, Question 3B-5d	If YES = 5 points If NO = 0 points		
Does the agency's policies and procedures comport to the Housing First Approach regulation?	NC 504 Housing First Assessment Report (March 2024)	If YES = 5 points If NO = 0 points		
Did the agency submit all of the required documents for the Housing First Assessment?	NC 504 Housing First Assessment Report (March 2024)	If YES = 5 points If NO = 0 points		
Did the agency complete the Housing First Assessment checklist?	NC 504 Housing First Assessment Report (March 2024)	If YES = 5 points If NO = 0 points		
<b>TOTAL ALLOWABLE POINTS</b>		<b>35</b>		
<b>REVIEWER TOTAL</b>			<b>0</b>	

**NC 504 Renewal Scorecard - PSH**

Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
Does the agency have <b>any unresolved</b> HUD Monitoring and/or OIG Audit finding(s) concerning any previous grant term related to this renewal project request? If yes, did the agency provide an explanation?	Project Application: All Projects Recipient Performance Screen Question 2	If YES = enter negative ten (-10) points If NO = 10 points		
Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: All Projects Recipient Performance Screen Question 2b	If response to above questions is NO, enter zero (0) Minimally addresses expectation/requirements: 2.5 Adequately addresses expectations/requirements: 5		
Project Information	Source of Information	Allowable Points	Points Received	Comments
Does the agency draw funds quarterly for your current renewal project?	Project Application: All Projects Recipient Performance Screen Question 3	If YES = 10 points If NO = enter negative ten (-10) points		
If no was selected to question 3, did the organization provide a reasonable explanation for why CoC funds were not drawn quarterly.	Project Application: All Projects Recipient Performance Screen Question 3a	If response to above questions is YES, enter zero (0) Adequately addresses expectations/requirements: 5 points		
Have any funds remained available for recapture by HUD for the most recently expired grant term related to this renewal project request?	Project Application: All Projects Recipient Performance Screen Question 4	If YES = enter negative ten (-10) points If NO = 10 points		
If no was selected to question 4, did organization provide a reasonable explanation for why CoC funds were available for recapture by HUD.	Project Application: All Projects Recipient Performance Screen Question 4a	If response to above questions is NO, enter zero (0) Adequately addresses expectations/requirements: 5 points		
Is your organization, or subrecipient, a victim service provider as defined in 24 CFR 578.3?	Project Application: Screen 3A, Question 7	For Information Purposes Only		
Did the agency provide a description of the project that addresses the entire scope of the proposed project?	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Subpopulations: Did applicant agency identify all populations they intend to serve?	Project Application: Screen 3B, Question 2	For Information Purposes Only		
Is this project 100% Dedicated or Dedicated/Dedicated PLUS? (Definitions are under question)	Project Application: Screen 3C, Question1, 5B	For Information Purposes Only		



**NC 504 Renewal Scorecard - PSH**

Does the applicant agency participate in the CoC?	NC 504 CoC meeting, subcommittee, and workgroup attendance logs (supplemental information)	<p align="center">Does not participate: 0                      Membership pending and/or minimally participates 25%-50% in meetings, workgroups, etc.: 2.5                      Participates in 51%-75% in meetings, workgroups, etc.: 5                      Participates in more than 75% in meetings, workgroups, etc.: 10</p>		
<b>Housing and Supportive Services</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
For all supportive services available to program participants, did the agency indicate who will provide them and how often they will be provided?	Project Application Screen 4A, Question 1 (Chart)	<p align="center">Yes = 5 No = 0</p>		
Did the agency address transportation assistance to program participants to attend mainstream benefit appointments, employment training, or jobs?	Project Application Screen 4A Question 2	<p align="center">Yes = 5 No = 0</p>		
Does the agency conduct annual follow-up with program participants to ensure mainstream benefits are received and renewed?	Project Application Screen 4A Question 3	<p align="center">Yes = 5 No = 0</p>		
Do program participants have access to SSI/SSDI technical assistance provided by the project applicant, subrecipient, or partner agency?	Project Application Screen 4A, Question 4	<p align="center">Yes = 5 No = 0</p>		
Has the staff person providing the technical assistance completed SOAR training in the past 24 months?	Project Application Screen 4A Question 4a	<p align="center">Yes = 5 No = 0</p>		
<b>Housing Type and Location</b>	<b>Source of Information</b>	<b>Allowable Points</b>		<b>Comments</b>
Did the agency specify the housing type/structures including maximum number of Units and Beds available for program participants at the selected housing site?	Project Application Screen 4B Question 1 and 2	<p align="center">Yes =10 No = 0</p>		
Applicant agency reported a higher number of units and beds than the number of households (units), and persons (beds) entered on Screen 5A and Screen 5B.	Project Application: Screen 4B, Question 2a-2b should correlate with Screen 5A and 5B	<p align="center">If Yes = 0 points If No = 10 points</p>		
<b>Project Performance and Utilization</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the agency submit their previous year's Annual Performance Report (APR) on time?	Project Application: All Projects Recipient Performance Screen Question 1	<p align="center">If YES = 5 points If NO = 0 points</p>		
Average Unit Utilization Rate to Date.	APR Q2	<p align="center">&lt;70% = 0 points 70-79% = 1 points 80-90%: 2.5 points &gt;90% = 5 points</p>		

NC 504 Renewal Scorecard - PSH

Length of time between project start date and housing move-in date.	APR Q22c	> 90 days = 0 points 31-89 Days = 2.5 points 30 days or less = 5 points		
Total % of participants with a permanent exit situation/destination.	APR Q23c	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% or no exits (0) reported = 5 points		
<b>Project Performance / Participant Services</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Increases in income: Total % of adults who retained, gained or increased <u>other</u> income from program entry to annual assessment.	APR Q19a1	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points		
Increases in income: Total % of adults who retained, gained or increased <u>earned</u> income from program entry to annual assessment.	APR Q19a1	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points		
Increases in income: Total % of Adults who retained, gained or increased <u>other</u> income from program entry to program exit.	APR Q19a2	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points		
Increases in income: Total % of adults who retained, gained or increased <u>earned</u> Income from program entry to program exit.	APR Q19a2	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points		
Increases in number of non-cash benefits: Total % of adults who Gained or Increased Number of Non-Cash Benefits from program entry to follow up / Total Adults ( <u>Stayers</u> , including those with none at entry).	APR Q20b	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points		
Increases in number of non-cash benefits: Total % of Adults Who Gained or Increased Income from program entry to program exit / Total Adults ( <u>Leavers</u> , including those with none at entry).	APR Q20b	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points		
Increases in enrollments in health insurance: Total % of adults who were Enrolled in Health Insurance from program entry to follow up / Total Adults ( <u>Stayers</u> , including those with no health insurance at program entry).	APR Q21	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points		
Increases in enrollments in health insurance: Total % of adults who were Enrolled in Health Insurance from program entry to program exit / Total Adults ( <u>Leavers</u> , including those with no health insurance at program entry).	APR Q21	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points		
<b>Project Funding and Performance</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>

**NC 504 Renewal Scorecard - PSH**

<p>Does the overall cost in each budget line item seem reasonable for the full scope of the project proposed? (Unit cost/ Bed cost are based on FMR.)</p>	<p>Project Application: Part 6 and Summary Budget</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p>Did the applicant agency document required match of no less than 25% of total assistance requested for this project (excluding leasing costs)?</p>	<p>Project Application Screen 6D</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p>Chronic Underspending: Based on the information provided, has this project demonstrated chronic underspending? <i>Chronic underspending occurs when a renewal project that has not already been reallocated fails to expend 90% or more of its grant funds during each of its three most recently closed out grant years prior to the measurement date OR fails to expend 90% or more of its grant funds during each of its second and third completed grant years.</i></p>	<p>eLOCCS, APR, CoC Quarterly Spending Report, NC-504 Monitoring Report</p>	<p>If YES = 0 points If NO = 10 points</p>		
<p>Chronic Underperformance: Based on the information provided, has this project demonstrated chronic underperformance? <i>Chronic underperformance occurs when a renewal project fails to serve 90% or more of the projected number of households during each of its three most recently completed grant years prior to the measurement date OR fails to serve 85% or more of the projected number of households during each of its first two completed grant years, per its APR. Chronic underperformance can also occur when a renewal project does not consistently meet performance benchmarks in the monitoring process.</i></p>	<p>eLOCCS, APR, CoC Quarterly Spending Report, NC-504 Monitoring Report</p>	<p>If YES = 0 points If NO = 10 points</p>		
<p><b>Inclusion Initiatives</b></p>	<p><b>Source of Information</b></p>	<p><b>Allowable Points</b></p>	<p><b>Points Received</b></p>	<p><b>Comments</b></p>
<p><b>Racial Equity &amp; Inclusion:</b> Agency includes Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities on its Board of Directors, Board Subcommittees or advisory/program planning groups and has clear methods for receiving input from these communities.</p>	<p>Board of Directors List, NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Racial Equity &amp; Inclusion:</b> Agency Board, leadership, and staff have demonstrated efforts to analyze and identify barriers that result in differences in service delivery/outcomes for Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities, have reviewed or revised policies, or received training/technical assistance to improve service delivery.</p>	<p>NC 504 Supplemental Information, Agency Training Logs</p>	<p>If YES = 10 points If NO = 0 points</p>		

**NC 504 Renewal Scorecard - PSH**

<p><b>Improving Assistance to LGBTQ+:</b> Agency has clear policies to ensure respect, safety, and access to programs and services for LGBTQ+, transgender, gender non-confirming, and non-binary individuals and households.</p>	<p>NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency includes persons with lived experience/expertise on its Board of Directors, has clear methods for receiving input from persons with lived experience/expertise. Agency details on how it acts on such input. Agency includes persons with lived experience/expertise in program planning and/or implementation.</p>	<p>Board of Directors List and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency leadership and staff is diverse, representative of the persons it intends to serve, and includes persons with lived experience/expertise in program planning, service delivery and/or program administration.</p>	<p>Organizational Staff list and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Violence Against Women Act (VAWA):</b> Agency has clear policies to ensure confidentiality and compliance with the VAWA, which is a federal law that, in part, provides protections for persons who have experienced domestic violence, dating violence, sexual assault, or stalking, or other unsafe conditions to reduce their likelihood of experiencing homelessness.</p>	<p>Agency Policies and Procedures and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p align="right"><b>TOTAL ALLOWABLE POINTS</b></p>		<p align="center">255</p>		
<p><b>REVIEWER TOTAL</b></p>			<p align="center"><b>0</b></p>	

**NC 504 Scorecard - RRH**

Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
Does the agency have <b>any unresolved</b> HUD Monitoring and/or OIG Audit finding(s) concerning any previous grant term related to this renewal project request? If yes, did the agency provide an explanation?	Project Application: All Projects Recipient Performance Screen Question 2	If YES = enter negative ten (-10) points If NO = 10 points		
Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: All Projects Recipient Performance Screen Question 2b	If response to above questions is NO, enter zero (0) Minimally addresses expectation/requirements: 2.5 Adequately addresses expectations/requirements:5		
Project Information	Source of Information	Allowable Points	Points Received	Comments
Does the agency draw funds quarterly for your current renewal project?	Project Application: All Projects Recipient Performance Screen Question 3	If YES = 10 points If NO = enter negative ten (-10) points		
If no was selected to question 3, did the organization provide a reasonable explanation for why CoC funds were not drawn quarterly.	Project Application: All Projects Recipient Performance Screen Question 3a	If response to above questions is YES, enter zero (0) Adequately addresses expectations/requirements:5		
Have any funds remained available for recapture by HUD for the most recently expired grant term related to this renewal project request?	Project Application: All Projects Recipient Performance Screen Question 4	If YES = enter negative ten (-10) points If NO = 10 points		
If no was selected to question 4, did organization provide a reasonable explanation for why CoC funds were available for recapture by HUD.	Project Application: All Projects Recipient Performance Screen Question 4a	If response to above questions is NO, enter zero (0) Adequately addresses expectations/requirements: 5 points		
Is your organization, or subrecipient, a victim service provider as defined in 24 CFR 578.3?	Project Application: Screen 3A, Question 7	For Information Purposes Only		
Did the agency provide a description of the project that addresses the entire scope of the proposed project?	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Subpopulations: Did applicant agency identify all populations they intend to serve?	Project Application: Screen 3B, Question 2	For Information Purposes Only		

**NC 504 Scorecard - RRH**

Does the applicant agency participate in the CoC?	NC 504 CoC meeting, subcommittee, and workgroup attendance logs (supplemental information)	<p align="center">Does not participate: 0                      Membership pending and/or minimally participates 25%-50% in meetings, workgroups, etc.: 2.5                      Participates in 51%-75% in meetings, workgroups, etc.: 5                      Participates in more than 75% in meetings, workgroups, etc.: 10</p>		
<b>Housing and Supportive Services</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
For all supportive services available to program participants, did the agency indicate who will provide them and how often they will be provided?	Project Application Screen 4A, Question 1 (Chart)	<p align="center">Yes = 5 No = 0</p>		
Did the agency address transportation assistance to program participants to attend mainstream benefit appointments, employment training, or jobs?	Project Application Screen 4A, Question 2	<p align="center">Yes = 5 No = 0</p>		
Does the agency conduct annual follow-up with program participants to ensure mainstream benefits are received and renewed?	Project Application Screen 4A, Question 3	<p align="center">Yes = 5 No = 0</p>		
Do program participants have access to SSI/SSDI technical assistance provided by the project applicant, subrecipient, or partner agency?	Project Application Screen 4A, Question 4	<p align="center">Yes = 5 No = 0</p>		
Has the staff person providing the technical assistance completed SOAR training in the past 24 months?	Project Application Screen 4A, Question 4a	<p align="center">Yes = 5 No = 0</p>		
<b>Housing Type and Location</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the agency specify the housing type/structures including maximum number of Units and Beds available for program participants at the selected housing site?	Project Application Screen 4B Question 1 and 2	<p align="center">Yes = 10 No = 0</p>		

**NC 504 Scorecard - RRH**

Applicant agency reported a higher number of units and beds than the number of households (units), and persons (beds) entered on Screen 5A and Screen 5B.	Project Application: Screen 4B, Question 2a-2b should correlate with Screen 5A and 5B	If Yes = 0 points If No = 10 points		
<b>Project Performance and Utilization</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the agency submit their previous year's Annual Performance Report (APR) on time?	Project Application: All Projects Recipient Performance Screen Question 1	If YES = 5 points If NO = 0 points		
Average Unit Utilization Rate to Date.	APR Q2	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points		
Total % of participants with a permanent exit situation/destination.	APR Q23c	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% or no exits (0) reported = 5 points		
Length of time between project start date and housing move-in date.	APR Q22c	> 90 days = 0 points 31-89 Days = 2.5 points 30 days or less = 5 points		
<b>Project Performance / Participant Services</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Increases in income: Total % of adults who retained, gained or increased <i>other</i> income from program entry to annual assessment.	APR Q19a1	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points		
Increases in income: Total % of adults who retained, gained or increased <i>earned</i> income from program entry to annual assessment.	APR Q19a1	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points		
Increases in income: Total % of Adults who retained, gained or increased <i>other</i> income from program entry to program exit.	APR Q19a2	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points		
Increases in income: Total % of adults who retained, gained or increased <i>earned</i> Income from program entry to program exit.	APR Q19a2	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points		
Increases in number of non-cash benefits: Total % of adults who Gained or Increased Number of Non-Cash Benefits from program entry to follow up / Total Adults ( <i>Stayers</i> , including those with none at entry).	APR Q20b	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points		

NC 504 Scorecard - RRH

<p>Increases in number of non-cash benefits: Total % of Adults Who Gained or Increased Income from program entry to program exit / Total Adults (<i>Leavers</i>, including those with none at entry).</p>	<p>APR Q20b</p>	<p>0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points</p>		
<p>Increases in enrollments in health insurance: Total % of adults who were Enrolled in Health Insurance from program entry to follow up / Total Adults (<i>Stayers</i>, including those with no health insurance at program entry)</p>	<p>APR Q21</p>	<p>0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points</p>		
<p>Increases in enrollments in health insurance: Total % of adults who were Enrolled in Health Insurance from program entry to program exit / Total Adults (<i>Leavers</i>, including those with no health insurance at program entry).</p>	<p>APR Q21</p>	<p>0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points</p>		
<p><b>Project Funding and Performance</b></p>	<p><b>Source of Information</b></p>	<p><b>Allowable Points</b></p>	<p><b>Points Received</b></p>	<p><b>Comments</b></p>
<p>Does the overall cost in each budget line item seem reasonable for the full scope of the project proposed? (Unit cost/ Bed cost are based on FMR.)</p>	<p>Project Application: Part 6 and Summary Budget</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p>Did the applicant agency document required match of no less that 25% of total assistance requested for this project (excluding leasing costs)?</p>	<p>Project Application Screen 6D</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p>Chronic Underspending: Based on the information provided, has this project demonstrated chronic underspending? <i>Chronic underspending occurs when a renewal project that has not already been reallocated fails to expend 90% or more of its grant funds during each of its three most recently closed out grant years prior to the measurement date OR fails to expend 90% or more of its grant funds during each of its second and third completed grant years.</i></p>	<p>eLOCCS, APR, CoC Quarterly Spending Report, NC-504 Monitoring Report</p>	<p>If YES = 0 points If NO = 10 points</p>		



NC 504 Scorecard - RRH

<p>Chronic Underperformance: Based on the information provided, has this project demonstrated chronic underperformance?  <i>Chronic underperformance occurs when a renewal project fails to serve 90% or more of the projected number of households during each of its three most recently completed grant years prior to the measurement date OR fails to serve 85% or more of the projected number of households during each of its first two completed grant years, per its APR. Chronic underperformance can also occur when a renewal project does not consistently meet performance benchmarks in the monitoring process.</i></p>	<p>eLOCCS, APR, CoC Quarterly Spending Report, NC-504 Monitoring Report</p>	<p>If YES = 0 points                  If NO = 10 points</p>		
Inclusion Initiatives	Source of Information	Allowable Points	Points Received	Comments
<p><b>Racial Equity &amp; Inclusion:</b> Agency includes Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities on its Board of Directors, Board Subcommittees or advisory/program planning groups and has clear methods for receiving input from these communities.</p>	<p>Board of Directors List, NC 504 Supplemental Information</p>	<p>If YES = 10 points                  If NO = 0 points</p>		
<p><b>Racial Equity &amp; Inclusion:</b> Agency Board, leadership, and staff have demonstrated efforts to analyze and identify barriers that result in differences in service delivery/outcomes for Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities, have reviewed or revised policies, or received training/technical assistance to improve service delivery.</p>	<p>NC 504 Supplemental Information, Agency Training Logs</p>	<p>If YES = 10 points                  If NO = 0 points</p>		

NC 504 Scorecard - RRH

<p><b>Improving Assistance to LGBTQ+:</b> Agency has clear policies to ensure respect, safety, and access to programs and services for LGBTQ+, transgender, gender non-confirming, and non-binary individuals and households.</p>	<p>NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency includes persons with lived experience/expertise on its Board of Directors, has clear methods for receiving input from persons with lived experience/expertise. Agency details on how it acts on such input. Agency includes persons with lived experience/expertise in program planning and/or implementation.</p>	<p>Board of Directors List and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency leadership and staff is diverse, representative of the persons it intends to serve, and includes persons with lived experience/expertise in program planning, service delivery and/or program administration.</p>	<p>Organizational Staff list and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Violence Against Women Act (VAWA):</b> Agency has clear policies to ensure confidentiality and compliance with the VAWA, which is a federal law that, in part, provides protections for persons who have experienced domestic violence, dating violence, sexual assault, or stalking, or other unsafe conditions to reduce their likelihood of experiencing homelessness.</p>	<p>Agency Policies and Procedures and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>TOTAL ALLOWABLE POINTS</b></p>		<p>255</p>		
<p><b>REVIEWER TOTAL</b></p>			<p><b>0</b></p>	

**NC 504 Renewal Scorecard - TH/RRH**

Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
Does the agency have <b>any unresolved</b> HUD Monitoring and/or OIG Audit finding(s) concerning any previous grant term related to this renewal project request? If yes, did the agency provide an explanation?	Project Application: All Projects Recipient Performance Screen Question 2	If YES = enter negative ten (-10) points If NO = 10 points		
Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: All Projects Recipient Performance Screen Question 2b	If response to above questions is NO, enter zero (0) Minimally addresses expectation/requirements: 2.5 Adequately addresses expectations/requirements:5		
Project Information	Source of Information	Allowable Points	Points Received	Comments
Does the agency draw funds quarterly for your current renewal project?	Project Application: All Projects Recipient Performance Screen Question 3	If YES = 10 points If NO = enter negative ten (-10) points		
If no was selected to question 3, did the organization provide a reasonable explanation for why CoC funds were not drawn quarterly.	Project Application: All Projects Recipient Performance Screen Question 3a	If response to above questions is YES, enter zero (0) Adequately addresses expectations/requirements:5		
Have any funds remained available for recapture by HUD for the most recently expired grant term related to this renewal project request?	Project Application: All Projects Recipient Performance Screen Question 4	If YES = enter negative ten (-10) points If NO = 10 points		
If no was selected to question 4, did organization provide a reasonable explanation for why CoC funds were available for recapture by HUD.	Project Application: All Projects Recipient Performance Screen Question 4a	If response to above questions is NO, enter zero (0) Adequately addresses expectations/requirements: 5 points		
Is your organization, or subrecipient, a victim service provider as defined in 24 CFR 578.3?	Project Application: Screen 3A, Question 7	For Information Purposes Only		
Did the agency provide a description of the project that addresses the entire scope of the proposed project?	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Subpopulations: Did applicant agency identify all populations they intend to serve?	Project Application: Screen 3B, Question 2	For Information Purposes Only		
Does the applicant agency participate in the CoC?	NC 504 CoC meeting, subcommittee, and workgroup attendance logs (supplemental information)	Does not participate: 0 Membership pending and/or minimally participates 25%-50% in meetings, workgroups, etc.:2.5 Participates in 51%-75% in meetings, workgroups, etc.: 5 Participates in more than 75% in meetings, workgroups, etc.: 10		
Housing and Supportive Services	Source of Information	Allowable Points	Points Received	Comments

**NC 504 Renewal Scorecard - TH/RRH**

For all supportive services available to program participants, did the agency indicate who will provide them and how often they will be provided?	Project Application Screen 4A, Question 1 (Chart)	Yes = 5 No = 0		
Did the agency address transportation assistance to program participants to attend mainstream benefit appointments, employment training, or jobs?	Project Application Screen 4A, Question 2	Yes = 5 No = 0		
Does the agency conduct annual follow-up with program participants to ensure mainstream benefits are received and renewed?	Project Application Screen 4A, Question 3	Yes = 5 No = 0		
Do program participants have access to SSI/SSDI technical assistance provided by the project applicant, subrecipient, or partner agency?	Project Application Screen 4A, Question 4	Yes = 5 No = 0		
Has the staff person providing the technical assistance completed SOAR training in the past 24 months?	Project Application Screen 4A, Question 4a	Yes = 5 No = 0		

Housing Type and Location	Source of Information	Allowable Points	Points Received	Comments
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Did the applicant agency provide the funding source for all units and beds available (transitional and/or rapid rehousing) for program participants at the selected housing type and location? <i>To ensure capacity to meet this requirement, the CoC Program requires that Joint TH and PH-RRH applications propose at least twice as many PH-RRH units &amp; beds as TH units &amp; beds.</i>	Project Application: Screen 4B, Question 3 and 4	Meets CoC program requirements = 10 points Does not meet CoC program requirements = 0 points		
Did the agency specify the housing type/structures including maximum number of Units and Beds available for program participants at the selected housing site?	Project Application Screen 4B Question 2 and 4	Yes = 5 No = 0		
Applicant agency reported a higher number of units and beds than the number of households (units), and persons (beds) entered on Screen 5A and Screen 5B.	Project Application: Screen 4B, Question 2a-2b should correlate with Screen 5A and 5B	If Yes = 0 points If No = 5 points		

Project Performance and Utilization	Source of Information	Allowable Points	Points Received	Comments
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Did the agency submit their previous year's Annual Performance Report (APR) on time?	Project Application: All Projects Recipient Performance Screen Question 1	If YES = 5 points If NO = 0 points		
Average Unit Utilization Rate to Date.	APR Q2	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points		
Length of time between project start date and housing move-in date.	APR Q22c	> 90 days = 0 points 31-89 Days = 2.5 points 30 days or less = 5 points		
Total % of participants with a permanent exit situation/destination.	APR Q23c	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% or no exits (0) reported = 5 points		

**NC 504 Renewal Scorecard - TH/RRH**

<b>Project Performance / Participant Services</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Increases in income: Total % of adults who retained, gained or increased <u>other</u> income from program entry to annual assessment.	APR Q19a1	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points		
Increases in income: Total % of adults who retained, gained or increased <u>earned</u> income from program entry to annual assessment.	APR Q19a1	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points		
Increases in income: Total % of Adults who retained, gained or increased <u>other</u> income from program entry to program exit.	APR Q19a2	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points		
Increases in income: Total % of adults who retained, gained or increased <u>earned</u> Income from program entry to program exit.	APR Q19a2	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points		
Increases in number of non-cash benefits: Total % of adults who Gained or Increased Number of Non-Cash Benefits from program entry to follow up / Total Adults ( <u>Stayers</u> , including those with none at entry).	APR Q20b	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points		
Increases in number of non-cash benefits: Total % of Adults Who Gained or Increased Income from program entry to program exit / Total Adults ( <u>Leavers</u> , including those with none at entry).	APR Q20b	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points		
Increases in enrollments in health insurance: Total % of adults who were Enrolled in Health Insurance from program entry to follow up / Total Adults ( <u>Stayers</u> , including those with no health insurance at program entry).	APR Q21	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points		
Increases in enrollments in health insurance: Total % of adults who were Enrolled in Health Insurance from program entry to program exit / Total Adults ( <u>Leavers</u> , including those with no health insurance at program entry).	APR Q21	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points		
<b>Project Funding and Performance</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Does the overall cost in each budget line item seem reasonable for the full scope of the project proposed? (Unit cost/ Bed cost are based on FMR.)	Project Application: Part 6 and Summary Budget	If YES = 10 points If NO = 0 points		
Did the applicant agency document required match of no less that 25% of total assistance requested for this project (excluding leasing costs)?	Project Application Screen 6D	If YES = 10 points If NO = 0 points		

**NC 504 Renewal Scorecard - TH/RRH**

<p>Chronic Underspending: Based on the information provided, has this project demonstrated chronic underspending? <i>Chronic underspending occurs when a renewal project that has not already been reallocated fails to expend 90% or more of its grant funds during each of its three most recently closed out grant years prior to the measurement date OR fails to expend 90% or more of its grant funds during each of its second and third completed grant years.</i></p>	<p>eLOCCS, APR, CoC Quarterly Spending Report, NC-504 Monitoring Report</p>	<p>If YES = 0 points If NO = 10 points</p>		
<p>Chronic Underperformance: Based on the information provided, has this project demonstrated chronic underperformance? <i>Chronic underperformance occurs when a renewal project fails to serve 90% or more of the projected number of households during each of its three most recently completed grant years prior to the measurement date OR fails to serve 85% or more of the projected number of households during each of its first two completed grant years, per its APR. Chronic underperformance can also occur when a renewal project does not consistently meet performance benchmarks in the monitoring process.</i></p>	<p>eLOCCS, APR, CoC Quarterly Spending Report, NC-504 Monitoring Report</p>	<p>If YES = 0 points If NO = 10 points</p>		
<p><b>Inclusion Initiatives</b></p>	<p><b>Source of Information</b></p>	<p><b>Allowable Points</b></p>	<p><b>Points Received</b></p>	<p><b>Comments</b></p>
<p><b>Racial Equity &amp; Inclusion:</b> Agency includes Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities on its Board of Directors, Board Subcommittees or advisory/program planning groups and has clear methods for receiving input from these communities.</p>	<p>Board of Directors List, NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Racial Equity &amp; Inclusion:</b> Agency Board, leadership, and staff have demonstrated efforts to analyze and identify barriers that result in differences in service delivery/outcomes for Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities, have reviewed or revised policies, or received training/technical assistance to improve service delivery.</p>	<p>NC 504 Supplemental Information, Agency Training Logs</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Improving Assistance to LGBTQ+:</b> Agency has clear policies to ensure respect, safety, and access to programs and services for LGBTQ+, transgender, gender non-confirming, and non-binary individuals and households.</p>	<p>NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy</p>	<p>If YES = 10 points If NO = 0 points</p>		

**NC 504 Renewal Scorecard - TH/RRH**

<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency includes persons with lived experience/expertise on its Board of Directors, has clear methods for receiving input from persons with lived experience/expertise. Agency details on how it acts on such input. Agency includes persons with lived experience/expertise in program planning and/or implementation.</p>	<p>Board of Directors List and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency leadership and staff is diverse, representative of the persons it intends to serve, and includes persons with lived experience/expertise in program planning, service delivery and/or program administration.</p>	<p>Organizational Staff list and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p><b>Violence Against Women Act (VAWA):</b> Agency has clear policies to ensure confidentiality and compliance with the VAWA, which is a federal law that, in part, provides protections for persons who have experienced domestic violence, dating violence, sexual assault, or stalking, or other unsafe conditions to reduce their likelihood of experiencing homelessness.</p>	<p>Agency Policies and Procedures and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>		
<p align="right"><b>TOTAL ALLOWABLE POINTS</b></p>		<p align="center">255</p>		
<p align="right"><b>REVIEWER TOTAL</b></p>			<p align="center"><b>0</b></p>	

<b>Agency Name: Family Services of the Piedmont</b>	
<b>Project Information</b>	
<b>Project Name: RRH</b>	
<b>Project Type: Renewal</b>	
<b>Agency's Funding Request: 92.889</b>	
<b>Funding Recommendation by Reviewer:</b>	
<b>Housing First Points Awarded</b>	35
<b>Project Application Points Awarded</b>	199
<b>Total Points</b>	234

Is this renewal project application requesting to consolidate?  
 (All Project - Renewal Grant Consolidation or Renewal Grant Expansion Screen Q1) YES/NO

Is this renewal project application requesting to expand?  
 (All Project - Renewal Grant Consolidation or Renewal Grant Expansion Screen Q1) YES/NO; If yes; note new project grant name.



**NC 504 Renewal Scorecard - Housing First**

<b>Housing First</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Does the project quickly move participants into permanent housing?	Project Application: Housing First, Question 3B-5a	If YES = 5 points If NO = 0 points	5	
Does the project screen out program participants who have the following barriers? [Having too little or little income, Active substance use or history of substance use, Untreated mental health concerns, Having a criminal record except for state-mandated exceptions, History of victimization (e.g., domestic violence, sexual assault, childhood abuse)]	Project Application: Housing First, Question 3B-5b	If none of the above checked = 0 points All other boxes/items checked = 5 points	5	
Will the project terminate program participant for any of the following reasons? [Failure to participate in supportive services, Failure to make progress on a service plan, Loss of income or failure to increase income, or any other activity not covered in a lease agreement, typically found for unassisted persons in the project's geographic area]	Project Application: Housing First, Question 3B-5c	If none of the above checked = 0 points All other boxes/items checked = 5 points	5	
Does the project follow a Housing First Approach?	Project Application: Housing First, Question 3B-5d	If YES = 5 points If NO = 0 points	5	
Does the agency's policies and procedures comport to the Housing First Approach regulation?	NC 504 Housing First Assessment Report (March 2024)	If YES = 5 points If NO = 0 points	5	
Did the agency submit all of the required documents for the Housing First Assessment?	NC 504 Housing First Assessment Report (March 2024)	If YES = 5 points If NO = 0 points	5	Note said renewal not needed
Did the agency complete the Housing First Assessment checklist?	NC 504 Housing First Assessment Report (March 2024)	If YES = 5 points If NO = 0 points	5	
<b>TOTAL ALLOWABLE POINTS</b>			<b>35</b>	
<b>REVIEWER TOTAL</b>			<b>35</b>	

**NC 504 Scorecard - RRH**

Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
Does the agency have <b>any unresolved</b> HUD Monitoring and/or OIG Audit finding(s) concerning any previous grant term related to this renewal project request? If yes, did the agency provide an explanation?	Project Application: All Projects Recipient Performance Screen Question 2	If YES = enter negative ten (-10) points If NO = 10 points	10	
Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: All Projects Recipient Performance Screen Question 2b	If response to above questions is NO, enter zero (0) Minimally addresses expectation/requirements: 2.5 Adequately addresses expectations/requirements:5	0	
Project Information	Source of Information	Allowable Points	Points Received	Comments
Does the agency draw funds quarterly for your current renewal project?	Project Application: All Projects Recipient Performance Screen Question 3	If YES = 10 points If NO = enter negative ten (-10) points	10	
If no was selected to question 3, did the organization provide a reasonable explanation for why CoC funds were not drawn quarterly.	Project Application: All Projects Recipient Performance Screen Question 3a	If response to above questions is YES, enter zero (0) Adequately addresses expectations/requirements:5	0	
Have any funds remained available for recapture by HUD for the most recently expired grant term related to this renewal project request?	Project Application: All Projects Recipient Performance Screen Question 4	If YES = enter negative ten (-10) points If NO = 10 points	10	
If no was selected to question 4, did organization provide a reasonable explanation for why CoC funds were available for recapture by HUD.	Project Application: All Projects Recipient Performance Screen Question 4a	If response to above questions is NO, enter zero (0) Adequately addresses expectations/requirements: 5 points	0	
Is your organization, or subrecipient, a victim service provider as defined in 24 CFR 578.3?	Project Application: Screen 3A, Question 7	For Information Purposes Only		
Did the agency provide a description of the project that addresses the entire scope of the proposed project?	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10	8	Gave an overview of criteria and services provided.
Subpopulations: Did applicant agency identify all populations they intend to serve?	Project Application: Screen 3B, Question 2	For Information Purposes Only		Survivors

**NC 504 Scorecard - RRH**

Does the applicant agency participate in the CoC?	NC 504 CoC meeting, subcommittee, and workgroup attendance logs (supplemental information)	Does not participate: 0 Membership pending and/or minimally participates 25%-50% in meetings, workgroups, etc.: 2.5 Participates in 51%-75% in meetings, workgroups, etc.: 5 Participates in more than 75% in meetings, workgroups, etc.: 10	10	
<b>Housing and Supportive Services</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
For all supportive services available to program participants, did the agency indicate who will provide them and how often they will be provided?	Project Application Screen 4A, Question 1 (Chart)	Yes = 5 No = 0	5	
Did the agency address transportation assistance to program participants to attend mainstream benefit appointments, employment training, or jobs?	Project Application Screen 4A, Question 2	Yes = 5 No = 0	5	
Does the agency conduct annual follow-up with program participants to ensure mainstream benefits are received and renewed?	Project Application Screen 4A, Question 3	Yes = 5 No = 0	5	
Do program participants have access to SSI/SSDI technical assistance provided by the project applicant, subrecipient, or partner agency?	Project Application Screen 4A, Question 4	Yes = 5 No = 0	5	
Has the staff person providing the technical assistance completed SOAR training in the past 24 months?	Project Application Screen 4A, Question 4a	Yes = 5 No = 0	5	
<b>Housing Type and Location</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the agency specify the housing type/structures including maximum number of Units and Beds available for program participants at the selected housing site?	Project Application Screen 4B Question 1 and 2	Yes = 10 No = 0	10	<b>Scattered housing - 25 Units and 43 Beds</b>

**NC 504 Scorecard - RRH**

Applicant agency reported a higher number of units and beds than the number of households (units), and persons (beds) entered on Screen 5A and Screen 5B.	Project Application: Screen 4B, Question 2a-2b should correlate with Screen 5A and 5B	If Yes = 0 points If No = 10 points		25 units and 28 survivors with 43 beds
<b>Project Performance and Utilization</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the agency submit their previous year's Annual Performance Report (APR) on time?	Project Application: All Projects Recipient Performance Screen Question 1	If YES = 5 points If NO = 0 points	5	
Average Unit Utilization Rate to Date.	APR Q2	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points		Started at question 5
Total % of participants with a permanent exit situation/destination.	APR Q23c	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% or no exits (0) reported = 5 points	0	
Length of time between project start date and housing move-in date.	APR Q22c	> 90 days = 0 points 31-89 Days = 2.5 points 30 days or less = 5 points	5	
<b>Project Performance / Participant Services</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Increases in income: Total % of adults who retained, gained or increased <i>other</i> income from program entry to annual assessment.	APR Q19a1	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points	0	50%
Increases in income: Total % of adults who retained, gained or increased <i>earned</i> income from program entry to annual assessment.	APR Q19a1	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points	0	50%
Increases in income: Total % of Adults who retained, gained or increased <i>other</i> income from program entry to program exit.	APR Q19a2	<70% = 0 points 70-79% = 1 points 80-90%: 2.5 points >90% = 5 points	0	0
Increases in income: Total % of adults who retained, gained or increased <i>earned</i> Income from program entry to program exit.	APR Q19a2	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points	0	0
Increases in number of non-cash benefits: Total % of adults who Gained or Increased Number of Non-Cash Benefits from program entry to follow up / Total Adults ( <i>Stayers</i> , including those with none at entry).	APR Q20b	0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points	0	

NC 504 Scorecard - RRH

<p>Increases in number of non-cash benefits: Total % of Adults Who Gained or Increased Income from program entry to program exit / Total Adults (<i>Leavers</i>, including those with none at entry).</p>	<p>APR Q20b</p>	<p>0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points</p>	<p>0</p>	
<p>Increases in enrollments in health insurance: Total % of adults who were Enrolled in Health Insurance from program entry to follow up / Total Adults (<i>Stayers</i>, including those with no health insurance at program entry)</p>	<p>APR Q21</p>	<p>0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points</p>	<p>5</p>	
<p>Increases in enrollments in health insurance: Total % of adults who were Enrolled in Health Insurance from program entry to program exit / Total Adults (<i>Leavers</i>, including those with no health insurance at program entry).</p>	<p>APR Q21</p>	<p>0% = 0 points 1-25% = 1 points 26-50% = 2.5 points 51-100% = 5 points</p>	<p>1</p>	
<p><b>Project Funding and Performance</b></p>	<p><b>Source of Information</b></p>	<p><b>Allowable Points</b></p>	<p><b>Points Received</b></p>	<p><b>Comments</b></p>
<p>Does the overall cost in each budget line item seem reasonable for the full scope of the project proposed? (Unit cost/ Bed cost are based on FMR.)</p>	<p>Project Application: Part 6 and Summary Budget</p>	<p>If YES = 10 points If NO = 0 points</p>	<p>10</p>	<p>Staffing</p>
<p>Did the applicant agency document required match of no less that 25% of total assistance requested for this project (excluding leasing costs)?</p>	<p>Project Application Screen 6D</p>	<p>If YES = 10 points If NO = 0 points</p>	<p>10</p>	<p>Letter provided</p>
<p>Chronic Underspending: Based on the information provided, has this project demonstrated chronic underspending? <i>Chronic underspending occurs when a renewal project that has not already been reallocated fails to expend 90% or more of its grant funds during each of its three most recently closed out grant years prior to the measurement date OR fails to expend 90% or more of its grant funds during each of its second and third completed grant years.</i></p>	<p>eLOCCS, APR, CoC Quarterly Spending Report, NC-504 Monitoring Report</p>	<p>If YES = 0 points If NO = 10 points</p>	<p>10</p>	

NC 504 Scorecard - RRH

<p>Chronic Underperformance: Based on the information provided, has this project demonstrated chronic underperformance?  <i>Chronic underperformance occurs when a renewal project fails to serve 90% or more of the projected number of households during each of its three most recently completed grant years prior to the measurement date OR fails to serve 85% or more of the projected number of households during each of its first two completed grant years, per its APR. Chronic underperformance can also occur when a renewal project does not consistently meet performance benchmarks in the monitoring process.</i></p>	<p>eLOCCS, APR, CoC Quarterly Spending Report, NC-504 Monitoring Report</p>	<p>If YES = 0 points                  If NO = 10 points</p>	<p>10</p>	
<p><b>Inclusion Initiatives</b></p>	<p><b>Source of Information</b></p>	<p><b>Allowable Points</b></p>	<p><b>Points Received</b></p>	<p><b>Comments</b></p>
<p><b>Racial Equity &amp; Inclusion:</b> Agency includes Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities on its Board of Directors, Board Subcommittees or advisory/program planning groups and has clear methods for receiving input from these communities.</p>	<p>Board of Directors List, NC 504 Supplemental Information</p>	<p>If YES = 10 points                  If NO = 0 points</p>	<p>10</p>	<p>Latest Board members people of color.</p>
<p><b>Racial Equity &amp; Inclusion:</b> Agency Board, leadership, and staff have demonstrated efforts to analyze and identify barriers that result in differences in service delivery/outcomes for Black, Brown, Indigenous, and Persons of Color and/or those representing historically marginalized or underserved communities, have reviewed or revised policies, or received training/technical assistance to improve service delivery.</p>	<p>NC 504 Supplemental Information, Agency Training Logs</p>	<p>If YES = 10 points                  If NO = 0 points</p>	<p>10</p>	<p>Information in policies, training provided, diverse Board and staff.</p>

NC 504 Scorecard - RRH

<p><b>Improving Assistance to LGBTQ+:</b> Agency has clear policies to ensure respect, safety, and access to programs and services for LGBTQ+, transgender, gender non-confirming, and non-binary individuals and households.</p>	<p>NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy</p>	<p>If YES = 10 points If NO = 0 points</p>	<p>10</p>	<p>Training provided and LGBTQ+ expert provider.</p>
<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency includes persons with lived experience/expertise on its Board of Directors, has clear methods for receiving input from persons with lived experience/expertise. Agency details on how it acts on such input. Agency includes persons with lived experience/expertise in program planning and/or implementation.</p>	<p>Board of Directors List and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>	<p>10</p>	
<p><b>Inclusion of Persons with Lived Experience/Expertise:</b> Agency leadership and staff is diverse, representative of the persons it intends to serve, and includes persons with lived experience/expertise in program planning, service delivery and/or program administration.</p>	<p>Organizational Staff list and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>	<p>10</p>	
<p><b>Violence Against Women Act (VAWA):</b> Agency has clear policies to ensure confidentiality and compliance with the VAWA, which is a federal law that, in part, provides protections for persons who have experienced domestic violence, dating violence, sexual assault, or stalking, or other unsafe conditions to reduce their likelihood of experiencing homelessness.</p>	<p>Agency Policies and Procedures and NC 504 Supplemental Information</p>	<p>If YES = 10 points If NO = 0 points</p>	<p>10</p>	
<p><b>TOTAL ALLOWABLE POINTS</b></p>		<p>255</p>		
<p><b>REVIEWER TOTAL</b></p>			<p>199</p>	

## Maria Lyons Legrande

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 6:12 PM  
**To:** Shanna Reece  
**Cc:** infoCoC; Cheri Neal; estratford@gmail.com; Denice Norris  
**Subject:** Notice of Reduced FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** Guilford County CoC Appeal Policy 8.2024.pdf; Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; NC504 CoC Reallocation Pol.pdf; TSC-RRH Renewal 2024 HUD CoC Letter.pdf  
**Importance:** High

Date: 9/20/2024

To: Shanna Reece, Executive Director

From: Guilford County CoC System Performance and Evaluation Committee

Re: FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024 Local HUD NOFO Competition. The *Guilford County CoC Appeal Process, Reallocation Policy, and the Rating and Ranking Policy* are attached to this email.

New/Renewal Project Name: Fast Track (RRH)

Project Type: Renewal

Score: 197

Ranking: 6

Annual Renewal Amount (ARA): \$180,957

Funding Amount Requested: \$180,957

Funding Amount Recommended: \$178,867

Reallocation: \$2,090

Rationale: Underspending

The SPE Committee developed priorities, reviewing and ranking projects that:

- Perform well on the Guilford County CoC's SPEC Scorecard, which includes HUD's System Performance Measures and other CoC project measures.
- Focus on serving the homeless subpopulations that have limited housing options (chronic, veterans, unaccompanied youth, families with children, and those experiencing domestic violence).
- Allocate funding based on HUD's estimated ARD, CoC Bonus, and DV Bonus amounts; maximize funding for the CoC by awarding bonus projects; and minimize the possibility of losing funding for renewals by ranking projects in Tier 1 or those that straddle the Tier 1/Tier 2 funding line.

As in past years, HUD requires a performance review and ranking, hence the annual rating process. There is no guarantee that projects with a partial or entire funding request if in Tier 2 will be awarded. *Please be aware this is contingent upon an award from HUD.*

Please submit your agency's acceptance, rejection, or appeal of the recommended amount to the Collaborative Applicant at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) to the attention of Renee Norris, the SPE Committee Chair, by 12:00 p.m. on Tuesday, September 24, 2024. Any agency who wishes to appeal the recommended funding amount should refer to the attached Guilford County CoC Appeals Process Document and follow the directions. If needed, the Appeals Committee will meet and notify the appealing agency of the decision no later than September 30, 2024. Questions may also be directed to Renee by email at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).



Thank you for your active participation in our Guilford County CoC and your partnership in building a robust housing system for all homeless persons in our community.

ATTACHMENTS:

- Guilford County CoC Appeal Process, Reallocation Policy, and the Rating and Ranking Policy

## Maria Lyons Legrande

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 6:06 PM  
**To:** jcox; Daye, Meredith  
**Cc:** Cheri Neal; estratford@gmail.com; Denice Norris; infoCoC  
**Subject:** Notice of Reduced FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** Guilford County CoC Appeal Policy 8.2024.pdf; Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; NC-504 CoC Reallocation Policy 2023 with Approval Dates.pdf; GHA.PSH-Housing Opportunities.2024 HUD CoC Letter.pdf  
**Importance:** High

Date: 9/20/2024

To: James Cox, CEO

From: Guilford County CoC System Performance and Evaluation Committee (SPEC)

Re: FY 2024 Local Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19<sup>th</sup>, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024-2025 Local HUD NOFO Competition. The Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Ranking Policies are attached to this email.

Project Name: Housing Opportunities (PSH)

Project Type: Renewal

Score: 175.0

Ranking: 8

Annual Renewal Amount: \$612,581

Requested Amount: \$612,581

Funding Amount Recommended: \$500,581

Reallocated Amount: \$112,000

Rationale: Underspending

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Thank you for your active participation in our Guilford County CoC and your partnership in building a robust housing system for all homeless persons in our community.

ATTACHMENTS: [Guilford County CoC Appeal Process](#), [Reallocation Policy](#), [Rating & Ranking Policy](#)

## Maria Lyons Legrande

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 6:06 PM  
**To:** ohenry@odm-hp.org; rross@odm-hp.org; Djones@odm-hp.org; Gsekaly@odm-hp.org  
**Cc:** infoCoC; Cheri Neal; estratford@gmail.com; Denice Norris  
**Subject:** Notice of Reduced FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** Guilford County CoC Appeal Policy 8.2024.pdf; Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; NC504 CoC Reallocation Pol.pdf; ODM.PSH.2024 HUD CoC Letter.pdf  
**Importance:** High

Date: 9/20/2024

To: Ryan Ross, Executive Director

From: Guilford County CoC System Performance and Evaluation Committee

Re: FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024 Local HUD NOFO Competition. The *Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Ranking Policies* are attached to this email.

Project Name: Permanent Supportive Housing III

Project Type: Renewal

Score: 187

Ranking: 7

Annual Renewal Amount: \$281,701

Funding Amount Requested: \$257,509

Funding Amount Recommended: \$257,509

Reallocation: \$24,192

Rationale: Voluntary Reallocation by agency

The SPE Committee developed priorities, reviewing and ranking projects that:

- Perform well on the Guilford County CoC's SPEC Scorecard, which includes HUD's System Performance Measures and other CoC project measures.
- Focus on serving the homeless subpopulations that have limited housing options (chronic, veterans, unaccompanied youth, families with children, and those experiencing domestic violence).
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ATTACHMENTS:

- Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Ranking Policies

## **Maria Lyons Legrande**

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 6:00 PM  
**To:** jcox; Daye, Meredith  
**Cc:** Cheri Neal; estratford@gmail.com; Denice Norris; infoCoC  
**Subject:** Notice of Reduced FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** Guilford County CoC Appeal Policy 8.2024.pdf; Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; NC-504 CoC Reallocation Policy 2023 with Approval Dates.pdf; GHA.PSH-Sheltering The Homeless.2024 HUD CoC Letter.pdf  
**Importance:** High

Date: 9/20/2024

To: James Cox, CEO

From: Guilford County CoC System Performance and Evaluation Committee

Re: FY 2024 Local Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19th, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024-2025 Local HUD NOFO Competition. The Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Ranking Policies are attached to this email.

Project Name: Sheltering the Homeless (PSH)

Project Type: Renewal

Score: 170.0

Ranking: 9

Annual Renewal Amount (ARA): \$559,226

Requested Amount: \$559,226

Funding Amount Recommended: \$436,226

Reallocated Amount: \$123,000

Rationale: Underspending

The SPE Committee developed priorities, reviewing and ranking projects that:

- Perform well on the Guilford County CoC's SPEC Scorecard, which includes HUD's System Performance Measures and other CoC project measures.
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- Allocate funding based on HUD's estimated ARD, CoC Bonus, and DV Bonus amounts; maximize funding for the CoC by awarding bonus projects; and minimize the possibility of losing funding for renewals by ranking projects in Tier 1 or those that straddle the Tier 1/Tier 2 funding line.

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ATTACHMENTS: Guilford County CoC Appeal Process, Reallocation Policy, Rating & Ranking Policy

## Maria Lyons Legrande

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 5:55 PM  
**To:** Leroy Wilson  
**Cc:** Cheri Neal; estratford@gmail.com; Denice Norris; infoCoC  
**Subject:** Notice of Accepted FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** Guilford County CoC Appeal Policy 8.2024.pdf; Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; NC504 CoC Reallocation Pol.pdf; SAGSO.RRH.2024 HUD CoC Letter.pdf  
**Importance:** High

Date: 9/20/2024

To: Leroy Wilson, Executive Director

From: Guilford County CoC System Performance and Evaluation Committee

Re: FY 2024 Local Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19<sup>th</sup>, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024 Local Housing Urban Development (HUD) NOFO Competition. The *Guilford County CoC Appeal Process, Reallocation Policy, and the Rating and Ranking Policy* are attached to this email.

New/Renewal Project Name: SAGSO RRH (RRH)

Project Type: Renewal

Score: 215

Ranking: 5

Annual Renewal Amount: \$147,362

Funding Amount Requested: \$147,362

Funding Amount Recommended: \$147,362

The SPE Committee developed priorities, reviewing and ranking projects that:

- Perform well on the Guilford County CoC's SPEC Scorecard, which includes HUD's System Performance Measures and other CoC project measures.
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**Please submit your agency's acceptance, rejection, or appeal of the recommended amount to the Collaborative Applicant at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) to the attention of Renee Norris, the SPE Committee Chair, by 12:00 p.m. on Tuesday, September 24, 2024.** Any agency who wishes to appeal the recommended funding amount should refer to the attached Guilford County CoC Appeals Process Document and follow the directions. If needed, the Appeals Committee will meet and notify the appealing agency of the decision no later than September 30, 2024. Questions may also be directed to Renee by email at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).

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**ATTACHMENTS:**

Guilford County CoC Appeal Process, *Reallocation Policy*, and *Rating and Ranking Policies*

## Maria Lyons Legrande

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 5:55 PM  
**To:** sherea@partnersendinghomelessness.org  
**Cc:** infoCoC; estratford@gmail.com; Denice Norris; Cheri Neal  
**Subject:** Notice of Accepted FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** NC504 CoC Reallocation Pol.pdf; Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; Guilford County CoC Appeal Policy 8.2024.pdf; PEH.HMIS.2024 HUD CoC Letter.pdf  
**Importance:** High

Date: 9/20/2024

To: Shereá Burnett, Executive Director

From: Guilford County CoC System Performance and Evaluation Committee

Re: FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024 Local HUD NOFO Competition. The *Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Ranking Policies* are attached to this email.

Project Name: HMIS Expansion  
Project Type: Renewal  
Score: Not Scored (Per CoC Process)  
Ranking: Not Scored (Per CoC Process)  
Annual Renewal Amount: \$69,721  
Funding Amount Requested: \$154,000  
Funding Amount Recommended: \$69,721

The SPE Committee developed priorities, reviewing and ranking projects that:

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- Focus on serving the homeless subpopulations that have limited housing options (chronic, veterans, unaccompanied youth, families with children, and those experiencing domestic violence).
- Allocate funding based on HUD's estimated ARD, CoC Bonus, and DV Bonus amounts; maximize funding for the CoC by awarding bonus projects; and minimize the possibility of losing funding for renewals by ranking projects in Tier 1 or those that straddle the Tier 1/Tier 2 funding line.

As in past years, HUD requires a performance review and ranking, hence the annual rating process. There is no guarantee that projects with a partial or entire funding request if in Tier 2 will be awarded. *Please be aware this is contingent upon an award from HUD.*

Please submit your agency's acceptance, rejection, or appeal of the recommended amount to the Collaborative Applicant at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) to the attention of Renee Norris, the SPE Committee Chair, by **12:00 p.m. on Tuesday, September 24, 2024**. Any agency who wishes to appeal the recommended funding amount should refer to the attached Guilford County CoC Appeals Process Document and follow the directions. If needed, the Appeals Committee will meet and notify the appealing agency of the decision no later than September 30, 2024. Questions may also be directed to Renee by email at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).

Thank you for your active participation in our Guilford County CoC and your partnership in building a robust housing system for all homeless persons in our community.

ATTACHMENTS:

- Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Ranking Policies

## Maria Lyons Legrande

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 5:55 PM  
**To:** sherea@partnersendinghomelessness.org  
**Cc:** Cheri Neal; estratford@gmail.com; Denice Norris; infoCoC  
**Subject:** Notice of Accepted FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** Guilford County CoC Appeal Policy 8.2024.pdf; Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; NC504 CoC Reallocation Pol.pdf; PEH.CE.2024 HUD CoC Letter.pdf  
**Importance:** High

Date: 9/20/2024

To: Shereá Burnett, Executive Director

From: Guilford County CoC System Performance and Evaluation Committee

Re: FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024 Local HUD NOFO Competition. The *Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Ranking Policies* are attached to this email.

Project Name: Coordinated Intake Expansion (Coordinated Entry)

Project Type: Renewal

Score: Not Scored (Per CoC Process)

Ranking: Not ranked (Per CoC Process)

Annual Renewal Amount: \$149,664

Funding Amount Requested: \$149,664

Funding Amount Recommended: \$149,664

The SPE Committee developed priorities, reviewing and ranking projects that:

- Perform well on the Guilford County CoC's SPEC Scorecard, which includes HUD's System Performance Measures and other CoC project measures.
- Focus on serving the homeless subpopulations that have limited housing options (chronic, veterans, unaccompanied youth, families with children, and those experiencing domestic violence).
- Allocate funding based on HUD's estimated ARD, CoC Bonus, and DV Bonus amounts; maximize funding for the CoC by awarding bonus projects; and minimize the possibility of losing funding for renewals by ranking projects in Tier 1 or those that straddle the Tier 1/Tier 2 funding line.

As in past years, HUD requires a performance review and ranking, hence the annual rating process. There is no guarantee that projects with a partial or entire funding request if in Tier 2 will be awarded. *Please be aware this is contingent upon an award from HUD.*

Please submit your agency's acceptance, rejection, or appeal of the recommended amount to the Collaborative Applicant at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) to the attention of Renee Norris, the SPE Committee Chair, by 12:00 p.m. on Tuesday, September 24, 2024. Any agency who wishes to appeal the recommended funding amount should refer to the attached Guilford County CoC Appeals Process Document and follow the directions. If needed, the Appeals Committee will meet and notify the appealing agency of the decision no later than September 30, 2024. Questions may also be directed to Renee by email at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).

Thank you for your active participation in our Guilford County CoC and your partnership in building a robust housing system for all homeless persons in our community.

ATTACHMENTS:

- Guilford County CoC Appeal Process, Reallocation Policy, and the Rating and Ranking Policy

## **Maria Lyons Legrande**

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 5:58 PM  
**To:** Leroy Wilson  
**Cc:** Cheri Neal; estratford@gmail.com; Denice Norris; infoCoC  
**Subject:** Notice of Accepted FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** Guilford County CoC Appeal Policy 8.2024.pdf; Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; NC504 CoC Reallocation Pol.pdf; SAGSO.PSH-HOME 1.2024 HUD CoC Letter.pdf

Date: 9/20/2024

To: Leroy Wilson, Executive Director

From: Guilford County CoC System Performance and Evaluation Committee

Re: FY 2024 Local Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19<sup>th</sup>, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024 Local Housing Urban Development (HUD) NOFO Competition. The *Guilford County CoC Appeal Process, Reallocation Policy, and the Rating and Ranking Policy* are attached to this email.

Project Name: SAGSO HOME I (PSH)

Project Type: Renewal

Score: 229.5

Ranking: 4

Annual Renewal Amount: \$351,700

Funding Amount Requested: \$351,700

Funding Amount Recommended: \$351,700

The SPE Committee developed priorities, reviewing and ranking projects that:

- Perform well on the Guilford County CoC's SPEC Scorecard, which includes HUD's System Performance Measures and other CoC project measures.
- Focus on serving the homeless subpopulations that have limited housing options (chronic, veterans, unaccompanied youth, families with children, and those experiencing domestic violence).
- Allocate funding based on HUD's estimated ARD, CoC Bonus, and DV Bonus amounts; maximize funding for the CoC by awarding bonus projects; and minimize the possibility of losing funding for renewals by ranking projects in Tier 1 or those that straddle the Tier 1/Tier 2 funding line.

As in past years, HUD requires a performance review and ranking, hence the annual rating process. There is no guarantee that projects with a partial or entire funding request if in Tier 2 will be awarded. *Please be aware this is contingent upon an award from HUD.*

**Please submit your agency's acceptance, rejection, or appeal of the recommended amount to the Collaborative Applicant at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) to the attention of Renee Norris, the SPE Committee Chair, by 12:00 p.m. on Tuesday, September 24, 2024.** Any agency who wishes to appeal the recommended funding amount should refer to the attached Guilford County CoC Appeals Process Document and follow the directions. If needed, the Appeals Committee will meet and notify the appealing agency of the decision no later than September 30, 2024. Questions may also be directed to Renee by email at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).

Thank you for your active participation in our Guilford County CoC and your partnership in building a robust housing system for all homeless persons in our community.

ATTACHMENTS:

Guilford County CoC Appeal Process, *Reallocation Policy*, and *Rating and Ranking Policies*

## **Maria Lyons Legrande**

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**From:** infoCoC  
**Sent:** Thursday, October 3, 2024 3:32 PM  
**To:** becky.hunt@fspcares.org; tom.campbell@fspcares.org  
**Cc:** Cheri Neal; estratford@gmail.com; Denice Norris  
**Subject:** Notice of Accepted FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** FSP.RRH.2024 HUD CoC Letter.pdf  
**Importance:** High

To: Thomas Campbell, President and CEO  
From: Guilford County CoC System Performance and Evaluation Committee (SPEC)  
Re: FY 2024 Local Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19th, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024-2025 Local HUD NOFO Competition. The Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Ranking Policies are attached to this email.

Project Name: Family Service of the Piedmont Victim RRH  
Project Type: Renewal  
Score: 234.0  
Ranking: 2  
Annual Renewal Amount (ARA): \$92,889  
Requested Amount: \$92,889  
Funding Amount Recommended: \$92,889

The SPE Committee developed priorities, reviewing and ranking projects that:

- Perform well on the Guilford County CoC's SPEC Scorecard, which includes HUD's System Performance Measures and other CoC project measures.
- Focus on serving the homeless subpopulations that have limited housing options (chronic, veterans, unaccompanied youth, families with children, and those experiencing domestic violence).
- Allocate funding based on HUD's estimated ARD, CoC Bonus, and DV Bonus amounts; maximize funding for the CoC by awarding bonus projects; and minimize the possibility of losing funding for renewals by ranking projects in Tier 1 or those that straddle the Tier 1/Tier 2 funding line.

As in past years, HUD requires a performance review and ranking, hence the annual rating process. There is no guarantee that projects with a partial or entire funding request if in Tier 2 will be awarded. Please be aware this is contingent upon an award from HUD.

**Please submit your agency's acceptance, rejection or appeal of the recommended amount to the Collaborative Applicant at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) to the attention of Renee Norris, the SPE Committee Chair, by 12:00 p.m. on Monday, October 7, 2024.** Any agency who wishes to appeal the recommended funding amount should refer to the attached Guilford County CoC Appeals Process Document and follow the directions. If needed, the Appeals Committee will meet and notify the appealing agency of the decision no later than October 11, 2024. Questions may also be directed to Renee by email at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).

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ATTACHMENTS: Guilford County CoC Appeal Process, Reallocation Policy, Rating & Ranking Policy



## **Maria Lyons Legrande**

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 6:00 PM  
**To:** Leroy Wilson  
**Cc:** Cheri Neal; estratford@gmail.com; Denice Norris; infoCoC  
**Subject:** Notice of Accepted FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** Guilford County CoC Appeal Policy 8.2024.pdf; Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; NC504 CoC Reallocation Pol.pdf; SAGSO.PSH-HOME 2.2024 HUD CoC Letter.pdf

Date: 9/20/2024

To: Leroy Wilson, Executive Director

From: Guilford County CoC System Performance and Evaluation Committee

Re: FY 2024 Local Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19<sup>th</sup> 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024 Local Housing Urban Development (HUD) NOFO Competition. The *Guilford County CoC Appeal Process, Reallocation Policy, and the Rating and Ranking Policy* are attached to this email.

Project Name: SAGSO RRH-Expansion

Project Type: New

Score: 252.5

Ranking: 12

Annual Renewal Amount: n/a

Funding Amount Requested: \$286,343

Funding Amount Recommended: \$102,626 Reallocated Funds

\$183,717- CoC Bonus

The SPE Committee developed priorities, reviewing and ranking projects that:

- Perform well on the Guilford County CoC's SPEC Scorecard, which includes HUD's System Performance Measures and other CoC project measures.
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Thank you for your active participation in our Guilford County CoC and your partnership in building a robust housing system for all homeless persons in our community.

**ATTACHMENTS:**

Guilford County CoC Appeal Process, *Reallocation Policy*, and *Rating and Ranking Policies*

## Maria Lyons Legrande

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**From:** infoCoC  
**Sent:** Thursday, October 3, 2024 3:34 PM  
**To:** becky.hunt@fspcares.org; tom.campbell@fspcares.org; infoCoC  
**Cc:** Cheri Neal; estratford@gmail.com; Denice Norris  
**Subject:** Notice of Accepted FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** FSP.Joint Project.2024 HUD CoC Letter.pdf  
**Importance:** High

**To:** Thomas Campbell, President and CEO

**From:** Guilford County CoC System Performance and Evaluation Committee (SPEC)

**Re:** FY 2024 Local Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19th, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024-2025 Local HUD NOFO Competition. The Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Ranking Policies are attached to this email.

Project Name: Family Service of the Piedmont Victim RRH

Project Type: New

Score: 266.0

Ranking: 10

Requested Amount: \$533,695

Funding Amount Recommended: \$533,695 – DV Bonus

The SPE Committee developed priorities, reviewing and ranking projects that:

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ATTACHMENTS: Guilford County CoC Appeal Process, Reallocation Policy, Rating & Ranking Policy

## Maria Lyons Legrande

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 6:04 PM  
**To:** Sarah Roethlinger; Jennifer Lewis  
**Cc:** Cheri Neal; infoCoC; estratford@gmail.com; Denice Norris  
**Subject:** Notice of Accepted FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** Guilford County CoC Appeal Policy 8.2024.pdf; Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; NC504 CoC Reallocation Pol.pdf; YF.Hearth.2024 HUD CoC Letter.pdf  
**Importance:** High

Date: 9/20/2024

To: Sarah Roethlinger, Executive Director

From: Guilford County CoC System Performance and Evaluation Committee

Re: FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024 Local HUD NOFO Competition. The *Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Ranking Policies* are attached to this email.

New/Renewal Project Name: HEARTH (Joint TH & PH-RRH)

Project Type: Renewal

Score: 232.5

Ranking: 3

Annual Renewal Amount: \$151,000

Funding Amount Requested: \$151,000

Funding Amount Recommended: \$151,000

The SPE Committee developed priorities, reviewing and ranking projects that:

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ATTACHMENTS:

- Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Ranking Policies

## **Maria Lyons Legrande**

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 6:05 PM  
**To:** kristina@ircgso.org  
**Cc:** Cheri Neal; estratford@gmail.com; Denice Norris; infoCoC  
**Subject:** Notice of Accepted FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** Guilford County CoC Appeal Policy 8.2024.pdf; Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; NC504 CoC Reallocation Pol.pdf; IRC RRH Project.2024 HUD CoC Letter.pdf

Date: 9/20/2024

To: Kristina Singleton, Executive Director

From: Guilford County CoC System Performance and Evaluation Committee (SPEC)

Re: FY 2024 Local Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19th, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024-2025 Local HUD NOFO Competition. The Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Ranking Policies are attached to this email.

Project Name: Interactive Resource Center Rapid Re-Housing 2025

Project Type: New

Score: 204.0

Ranking: 13

Requested Amount: \$554,858

Funding Amount Recommended: \$243,239 - CoC Bonus

The SPE Committee developed priorities, reviewing and ranking projects that:

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There is no guarantee that projects with a partial or entire funding request if in Tier 2 will be awarded. Please be aware this is contingent upon an award from HUD.

**Please submit your agency's acceptance, rejection or appeal of the recommended amount to the Collaborative Applicant at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) to the attention of Renee Norris, the SPE Committee Chair, by 12:00 p.m. on Tuesday, September 24, 2024.** Any agency who wishes to appeal the recommended funding amount should refer to the attached Guilford County CoC Appeals Process Document and follow the directions. If needed, the Appeals Committee will meet and notify the

appealing agency of the decision no later than September 30, 2024. Questions may also be directed to Renee by email at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).

Thank you for your active participation in our Guilford County CoC and your partnership in building a robust housing system for all homeless persons in our community.

ATTACHMENTS: Guilford County CoC Appeal Process, Reallocation Policy, Rating & Ranking Policy

## Maria Lyons Legrande

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 6:10 PM  
**To:** Shanna Reece  
**Cc:** infoCoC; Cheri Neal; estratford@gmail.com; Denice Norris  
**Subject:** Notice of Accepted FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; NC504 CoC Reallocation Pol.pdf; Guilford County CoC Appeal Policy 8.2024.pdf; TSC-RRH Expansion 2024 HUD CoC Letter.pdf  
**Importance:** High

Date: 9/20/2024

To: Shanna Reece, Executive Director

From: Guilford County CoC System Performance and Evaluation Committee

Re: FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024 Local HUD NOFO Competition. The *Guilford County CoC Appeal Process, Reallocation Policy, and Rating and Raking Review Policy*.

New/Renewal Project Name: Fast Track (RRH)Expansion

Project Type: New

Score: 255

Ranking: 11

Annual Renewal Amount (ARA): N/A

Funding Amount Requested: \$192,757

Funding Amount Recommended: \$158,656

The SPE Committee developed priorities, reviewing and ranking projects that:

- Perform well on the Guilford County CoC's SPEC Scorecard, which includes HUD's System Performance Measures and other CoC project measures.
- Focus on serving the homeless subpopulations that have limited housing options (chronic, veterans, unaccompanied youth, families with children, and those experiencing domestic violence).
- Allocate funding based on HUD's estimated ARD, CoC Bonus, and DV Bonus amounts; maximize funding for the CoC by awarding bonus projects; and minimize the possibility of losing funding for renewals by ranking projects in Tier 1 or those that straddle the Tier 1/Tier 2 funding line.

As in past years, HUD requires a performance review and ranking, hence the annual rating process. There is no guarantee that projects with a partial or entire funding request if in Tier 2 will be awarded. *Please be aware this is contingent upon an award from HUD.*

Please submit your agency's acceptance, rejection, or appeal of the recommended amount to the **Collaborative Applicant at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) to the attention of Renee Norris, the SPE Committee Chair, by 12:00 p.m. on Tuesday, September 24, 2024.** Any agency who wishes to appeal the recommended funding amount should refer to the attached Guilford County CoC Appeals Process Document and follow the directions. If needed, the Appeals Committee will meet and notify the appealing agency of the decision no later than September 30, 2024. Questions may also be directed to Renee by email at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).

Thank you for your active participation in our Guilford County CoC and your partnership in building a robust housing system for all homeless persons in our community.



ATTACHMENTS:

- Guilford County CoC Appeal Process, *Reallocation Policy*, and *Rating and Raking Review Policy*.

## Maria Lyons Legrande

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**From:** infoCoC  
**Sent:** Friday, September 20, 2024 6:12 PM  
**To:** Shanna Reece  
**Cc:** infoCoC; Denice Norris; Cheri Neal; estratford@gmail.com  
**Subject:** Notice of Accepted FY 2024 Local Department of Housing and Urban Development (HUD) Continuum of Care Grant Application  
**Attachments:** NC504 CoC Reallocation Pol.pdf; Guilford County CoC Appeal Policy 8.2024.pdf; Guilford County Continuum of Care Rating and Ranking Policy and Procedures 8.2024.pdf; TSC.PSH.2024 HUD CoC Letter.pdf  
**Importance:** High

Date: 9/20/2024

To: Shanna Reece, Executive Director

From: Guilford County CoC System Performance and Evaluation Committee

Re: FY 2024 Local HUD Continuum of Care Grant Application Notification

The System Performance and Evaluation (SPE) Committee of the Guilford County Continuum of Care (CoC) met on September 19, 2024, to review new and renewal project applications and to approve a ranking recommendation of CoC project applicants for the FY 2024 Local HUD NOFO Competition. The *Guilford County CoC Appeal Process, Reallocation Policy, and the Rating and Ranking Policy* are attached to this email.

New/Renewal Project Name: Glenwood Housing II (PSH)

Project Type: Renewal

Score: 242

Ranking: 1

Funding Amount Recommended: \$16,016

The SPE Committee developed priorities, reviewing and ranking projects that:

- Perform well on the Guilford County CoC's SPEC Scorecard, which includes HUD's System Performance Measures and other CoC project measures.
- Focus on serving the homeless subpopulations that have limited housing options (chronic, veterans, unaccompanied youth, families with children, and those experiencing domestic violence).
- Allocate funding based on HUD's estimated ARD, CoC Bonus, and DV Bonus amounts; maximize funding for the CoC by awarding bonus projects; and minimize the possibility of losing funding for renewals by ranking projects in Tier 1 or those that straddle the Tier 1/Tier 2 funding line.

As in past years, HUD requires a performance review and ranking, hence the annual rating process.

It is also important to understand that the CoC could potentially lose funding when renewal projects straddle the line. As stated in the FY 2024 CoC Competition NOFO (page 30):

*"If a project application straddles the Tier 1 and Tier 2 funding line, HUD will conditionally select the project up to the amount of funding that falls within Tier 1. Using the CoC score, and other factors described in section I.B.3.j of this NOFO, HUD may fund the Tier 2 portion of the project. If HUD does not fund the Tier 2 portion of the project, HUD may award the project at the reduced amount based on the amount of funding that falls within Tier 1, provided the project is still feasible with the reduced funding (e.g., is able to continue serving homeless program participants effectively)."*

In short, there is no guarantee that projects with a partial or entire funding request in Tier 2 will be awarded.

Any agency who wishes to appeal the recommended funding amount should consult the attached Guilford County CoC Appeals Process Document and follow the directions. **Appeals should be sent to the Collaborative Applicant at [infoCoC@guilfordcounty.gov](mailto:infoCoC@guilfordcounty.gov) to the attention of Bernita Sims, the SPE Committee Chair, by 12:00 p.m. on Tuesday,**

**September 24, 2024.** If needed, the Appeals Committee will meet and notify the appealing agency of the decision by September 27, 2024. Questions may also be directed to Renee by email.

Thank you for your active participation in our Guilford County CoC and your partnership in building a robust housing system for all homeless persons in our community.

ATTACHMENTS:


- Guilford County CoC Appeal Process, *Reallocation Policy*, and the *Rating and Ranking Policy*

NC-504 CoC	
Local Competition Selection Results	
Field Office:	Greensboro
CoC Number:	NC-504
CoC Name:	Guilford County CoC
Collaborative Applicant (CA) Name:	Guilford County
NC-504 Annual Renewal Demand	\$ 2,612,817
TIER 1 (90% OF ARD)	\$ 2,351,535
TIER 2 (10% OF ARD)	\$ 261,282
CoC BONUS	\$ 426,956
DV BONUS	\$ 533,695
CoC PLANNING	\$ 177,898
TOTAL, IF AWARDED	\$ 3,751,366

#	AGENCY	PROJECT NAME	SCORE	STATUS	RANK	AMOUNT		
						RECOMMENDED FUNDING TYPE	REQUESTED FROM HUD	REALLOCATED FUNDS
1	The Servant Center	Glenwood Housing II	242.0	Accepted	1	Tier 1	\$ 16,016	
2	Family Services of the Piedmont	Victim RRH	234.0	Accepted	2	Tier 1	\$ 92,889	
3	Youth Focus	HEARTH	232.5	Accepted	3	Tier 1	\$ 151,000	
4	Salvation Army of Greensboro	SAGSO Home	229.5	Accepted	4	Tier 1	\$ 351,700	
5	Salvation Army of Greensboro	SAGSO RRH	215.0	Accepted	5	Tier 1	\$ 147,362	
6	The Servant Center	Fast Track RRH	197.0	Reduced Reallocated	6	Tier 1	\$ 178,867	\$ (2,090)
7	Open Door Ministries	PSH III	187.0	Reduced Reallocated	7	Tier 1	\$ 257,509	\$ (24,192)
8	Greensboro Housing Authority	Housing Opportunities	175.0	Reduced Reallocated	8	Tier 1	\$ 500,581	\$ (112,000)
9	Greensboro Housing Authority	Sheltering the Homeless	170.0	Reduced Reallocated	9	Tier 1	\$ 436,226	\$ (123,000)
10	Partners Ending Homelessness	Coordinated Intake	Awarded	Accepted	10	Tier 1	\$ 149,664	
11	Partners Ending Homelessness	HMIS Expansion	Awarded	Accepted	11	Tier 1	\$ 69,721	
12	The Servant Center	Fast Track RRH - Expansion	255.0	Accepted	13	Tier 2	\$ 158,656	\$ 158,656
13	Salvation Army of Greensboro	SAGSO RRH - Expansion	252.5	Accepted	14	Tier 2	\$ 102,626	\$ 102,626
	Salvation Army of Greensboro	SAGSO RRH - Expansion	252.5	Accepted	14	CoC Bonus	\$ 183,717	
14	Interactive Resource Center	New	204.0	Accepted	15	CoC Bonus	\$ 243,239	
15	Family Services of the Piedmont	Victim Joint TH and PH/RRH	266.0	Accepted	12	DV Bonus	\$ 533,695	
16	Guilford County DHHS	Collaborative Applicant / CoC Lead	Awarded	Accepted	Not Ranked	CoC Planning	\$ 177,898	
<b>Total</b>							<b>\$ 3,751,366</b>	<b>\$ -</b>

Category	Req. by Category	Req. v Avail.
Tier 1	\$ 2,351,535	\$ -
Tier 2	\$ 261,282	\$ -
CoC Bonus	\$ 426,956	\$ -
DV Bonus	\$ 533,695	\$ -
CoC Planning	\$ 177,898	\$ -
<b>Total Request</b>	<b>\$ 3,751,366</b>	<b>\$ -</b>

https://www.guilfordcountync.gov/our-county/health-and-human-services/continuum-of-care/grants/fiscal-year-2024-local-hud-nofo-competition



**Guilford County**  
STATE OF NORTH CAROLINA

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- Calendar
- Membership
- CoC Meeting Minutes
- Data
- Grants
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- Volunteer
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- Guilford County Cooling Stations (2024)
- Contact Us

Our County » Health and Human Services » Continuum of Care » Grants »

## FY 2024-2025 HUD Notice of Funding Opportunity (NOFO) Local Competition

Print Feedback Share & Bookmark Font Size

**The NC-504 Approved CoC Consolidated Application and Priority Listings is now available.**

All parts of the approved application are posted here and available to the community for review. Please email [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) for comments and questions.

[FY 2024 NC-504 Approved Consolidated Application](#)

[FY 2024 NC-504 Approved Project Priority Listings](#)

Arrangements will be made to provide technical assistance or review of any or all parts of this announcement, the NC-504 CoC applications process, details, and obligations in a manner that is effective for persons with disabilities or any person with Limited English Proficiency (LEP).


*(Se harán arreglos para brindar asistencia técnica o revisar alguna o todas las partes de este anuncio, el proceso de solicitud del CoC NC-504, los detalles y las obligaciones de una manera que sea efectiva para las personas con discapacidades cualquier persona con dominio limitado del inglés).*

57°F Mostly clear 8:10 PM 10/28/2024

https://www.guilfordcountync.gov/our-county/human-services/continuum-of-care

Membership

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- Data
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Our County » Health and Human Services »

## Continuum of Care

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Membership

**Continuum of Care**  
1203 Maple Street  
Greensboro NC 27405

find us on **facebook**

Email: [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov)

**EVENTS**  
No results found.

The NC-504 Approved CoC Consolidated Application has been posted. Review the Approved Consolidated Application and Approved Priority Listings that include reallocation forms and all New, Renewal and Replacement Project Listing [here](#). [Posted: October 28, 2024]

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https://www.guilfordcountync.gov/home/showpublisheddocument/15454

1 of 648

**Applicant:** Guilford County CoC  
**Project:** NC-504 CoC Registration FY 2024

NC-504  
COC\_REG\_2024\_215109

## 1A. Continuum of Care (CoC) Identification

HUD publishes resources on the HUD gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants, - 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

**1A-1. CoC Name and Number:** NC-504 - Greensboro, High Point/Guilford County CoC

**1A-2. Collaborative Applicant Name:** Guilford County DHHS

**1A-3. CoC Designation:** CA

**1A-4. HMIS Lead:** Partners Ending Homelessness

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https://www.guilfordcountync.gov/home/showpublisheddocument/15442/638657143423300000

1 of 62

**Applicant:** Guilford County CoC  
**Project:** NC-504 CoC Registration FY 2024

NC-504  
COC\_REG\_2024\_215109

## 1A. Continuum of Care (CoC) Identification

**Instructions:**

For guidance on completing the CoC Priority listing, please reference the CoC Priority Listing Detailed Instructions and CoC Priority Listing Navigational Guide on HUD's website. [https://www.hud.gov/program\\_offices/comm\\_planning/coc/competition](https://www.hud.gov/program_offices/comm_planning/coc/competition).

**Collaborative Applicant Name:** Guilford County DHHS

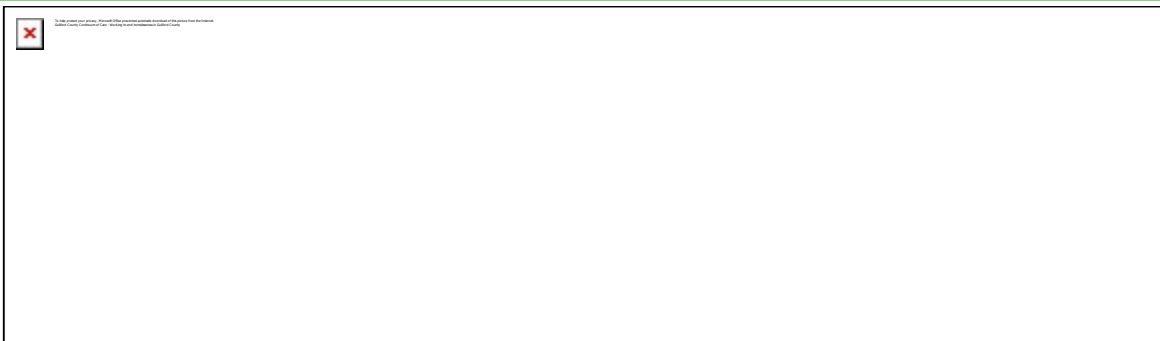
57°F Mostly clear 8:18 PM 10/28/2024

**Emily Lewis**

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**From:** Guilford County Continuum of Care <GuilfordCountyCoC@info.guilfordcountync.gov>  
**Sent:** Monday, October 28, 2024 8:14 PM  
**To:** Emily Lewis  
**Subject:** NC-504 Approved FY-2024 CoC Consolidated Application Posted

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## Guilford County CoC Announcement

### NC-504 Approved FY-2024 CoC Consolidated Application Posted

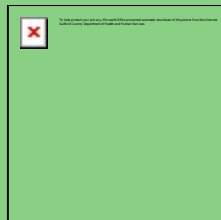
The NC-504 FY-2024 Approved CoC Consolidated Application and Priority Listings has been posted on the [CoC website](#).

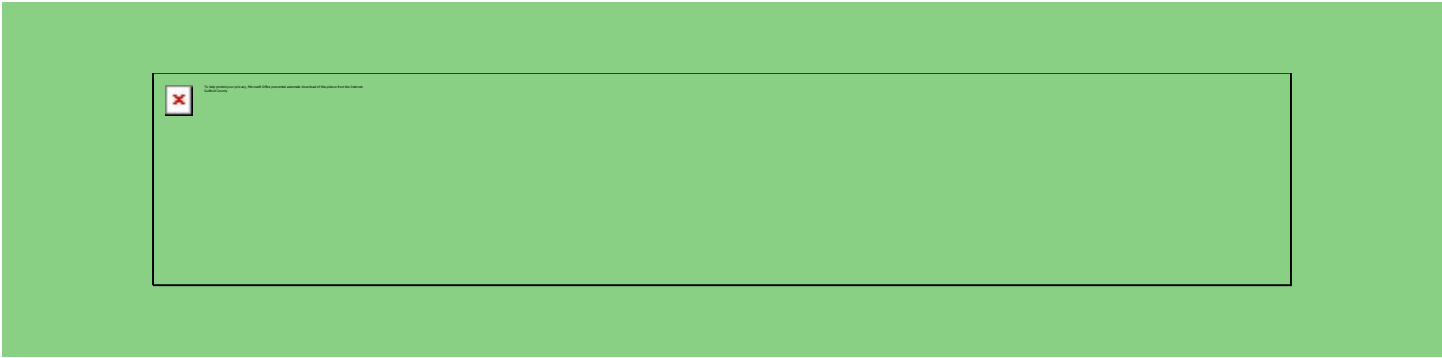
For comments or questions about the Approved Application, please email [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov). The application will be submitted to HUD by October 30, 2024.

Thank you,

The Guilford County CoC Team

**Thank you for your continued commitment to the Guilford County CoC!**





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This service is provided to you at no charge by [Guilford County, NC](#).

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This email was sent to [elewis@guilfordcountync.gov](mailto:elewis@guilfordcountync.gov) using govDelivery Communications Cloud on behalf of: Guilford County, NC · 301 West Market Street, Greensboro, NC 27401





# 2024 HDX Competition Report

This workbook contains summary information about your CoC's data as it was entered into HDX 1.0 and HDX 2.0 for your use as part of the 2024 Competition.

### **To Print this Workbook:**

This document has been configured as printable with preset print areas of relevant sections. To print it, go to "File", then "Print", then select "Print Entire Workbook" or "Print Active Sheets" depending on your needs.

### **To Save This Workbook as a PDF:**

Click the "File" Tab, then click "Save As" or "Save a Copy", then click "Browse" or "More Options" then select "PDF", click "Options", select "Entire Workbook", press "OK", and click "Save". These instructions may change depending on your version of Microsoft Excel.

### **On Accessibility, Navigability, and Printability:**

This workbook attempts to maximize accessibility, navigability, printability, and ease of use. Merged cells have been avoided. All tables and text boxes have been given names. Extraneous rows and columns outside printed ranges have been hidden. Formulas may include references to hidden rows and columns or data tables. For ease of use, these referenced sources have been hidden but can be unhidden by any user at any time. Raw data sources contained in this workbook are named according to the module and fiscal year from which they originate - e.g. "HIC\_2024" is the Housing Inventory Count raw data from Fiscal Year 2024.

### **For Questions:**

If you have questions, please reach out to HUD via the "Ask a Question" page, <https://www.hudexchange.info/program-support/my-question/> and choose "HDX" as the topic.

# 2024 HDX Competition Report

## 2024 Competition Report - Summary

NC-504 - Greensboro, High Point CoC

### HDX Data Submission Participation Information

Government FY and HDX Module Abbreviation	Met Module Deadline*	Data From	Data Collection Period in HDX 2.0
2023 LSA	Yes	Government FY 2023 (10/1/22 - 9/30/23).	November 2023 to January of 2024
2023 SPM	Yes	Government FY 2023 (10/1/22 - 9/30/23).**	February 2024 to March 2024
2024 HIC	Yes	Government FY 2024. Exact HIC and PIT dates will vary by CoC. For most CoCs, it will be last Wednesday in January of 2024.	March 2024 to May 2024
2024 PIT	Yes	Government FY 2024. Exact HIC and PIT dates will vary by CoC. For most CoCs, it will be last Wednesday in January of 2024.	March 2024 to May 2024

1) FY = Fiscal Year

2) \*This considers all extensions where they were provided.

2) \*\*"Met Deadline" in this context refers to FY23 SPM submissions. Resubmissions from FY 2022 (10/1/21 - 9/30/22) were also accepted during the data collection period, but these previous year's submissions are voluntarily and are not required.

## 2024 HDX Competition Report

### 2024 Competition Report - LSA Summary & Usability Status

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### LSA Usability Status 2023

Category	EST AO	EST AC	EST CO	RRH AO	RRH AC	RRH CO	PSH AO	PSH AC	PSH CO
Fully Usable							<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Partially Usable									
Not Usable	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			

#### EST

Category	2021	2022	2023
Total Sheltered Count	1,407	1,284	1,082
AO	821	807	713
AC	463	341	263
CO	117	130	108

#### RRH

Category	2021	2022	2023
Total Sheltered Count	314	326	110
AO	151	123	44
AC	160	195	59
CO	0	0	0

## 2024 HDX Competition Report

### 2024 Competition Report - LSA Summary & Usability Status

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### PSH

Category	2021	2022	2023
Total Sheltered Count	238	219	243
AO	115	115	121
AC	123	105	120
CO	0	0	0

1) Glossary: EST = Emergency Shelter, Save Haven, & Transitional Housing; RRH = Rapid Re-housing; PSH = Permanent Supportive Housing; AO = Persons in Households without Children; AC = Persons in Households with at least one Adult and one Child; CO=Persons in Households with only Children

2) Because people have multiple stays in shelter over the course of a year and stay in different household configurations, a single person can be counted in more than one household type.

Therefore, the sum of the number of people by household type may be greater than the unique count of people.

3) Total Sheltered count only includes those served in HMIS participating projects reported by your CoC.

4) For CoCs that experienced mergers during any of these reporting periods, historical data will include only the original CoCs.

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### Measure 1: Length of Time Persons Remain Homeless

This measures the number of clients active in the report date range across ES, SH (Metric 1.1) and then ES, SH and TH (Metric 1.2) along with their average and median length of time homeless. This includes time homeless during the report date range as well as prior to the report start date, going back no further than the look back stop date or client's date of birth, whichever is later.

Metric 1.1: Change in the average and median length of time persons are homeless in ES and SH projects.

Metric 1.2: Change in the average and median length of time persons are homeless in ES, SH, and TH projects.

a. This measure is of the client's entry, exit, and bed night dates strictly as entered in the HMIS system.

Metric	Universe (Persons)	Average LOT Homeless (bed nights)	Median LOT Homeless (bed nights)
1.1 Persons in ES-EE, ES-NbN, and SH	1,051	93.5	53.0
1.2 Persons in ES-EE, ES-NbN, SH, and TH	1,160	104.4	60.0

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

b. This measure is based on data element 3.917

This measure includes data from each client's Living Situation (Data Standards element 3.917) response as well as time spent in permanent housing projects between Project Start and Housing Move-In. This information is added to the client's entry date, effectively extending the client's entry date backward in time. This "adjusted entry date" is then used in the calculations just as if it were the client's actual entry date.

Metric	Universe (Persons)	Average LOT Homeless (bed nights)	Median LOT Homeless (bed nights)
1.1 Persons in ES-EE, ES-NbN, SH, and PH (prior to "housing move in")	1,232	821.2	266.0
1.2 Persons in ES-EE, ES-NbN, SH, TH, and PH (prior to "housing move in")	1,333	792.1	266.0

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### Measure 2: Returns to Homelessness for Persons who Exit to Permanent Housing (PH) Destinations

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.

Metric	Total # of Persons Exited to a PH Destination (2 Yrs Prior)	Returns to Homelessness in Less than 6 Months (0 - 180 days)		Returns to Homelessness from 6 to 12 Months (181 - 365 days)		Returns to Homelessness from 13 to 24 Months (366 - 730 days)		Number of Returns in 2 Years	
	Count	Count	% of Returns	Count	% of Returns <sup>4</sup>	Count	% of Returns <sup>6</sup>	Count	% of Returns <sup>8</sup>
Exit was from SO	44	2	4.6%	1	2.3%	1	2.3%	4	9.1%
Exit was from ES	459	41	8.9%	13	2.8%	17	3.7%	71	15.5%
Exit was from TH	63	5	7.9%	3	4.8%	2	3.2%	10	15.9%
Exit was from SH	0	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Exit was from PH	202	2	1.0%	5	2.5%	8	4.0%	15	7.4%
<b>TOTAL Returns to Homelessness</b>	<b>768</b>	<b>50</b>	<b>6.5%</b>	<b>22</b>	<b>2.9%</b>	<b>28</b>	<b>3.7%</b>	<b>100</b>	<b>13.0%</b>

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### Measure 3: Number of Homeless Persons

##### Metric 3.1 – Change in PIT Counts

Please refer to PIT section for relevant data.

##### Metric 3.2 – Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

Metric	Value
Universe: Unduplicated Total sheltered homeless persons	1,174
Emergency Shelter Total	1,055
Safe Haven Total	12
Transitional Housing Total	119



## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

This measure is divided into six tables capturing employment and non-employment income changes for system leavers and stayers. The project types reported in these metrics are the same for each metric, but the type of income and universe of clients differs. In addition, the projects reported within these tables are limited to CoC-funded projects.

##### Metric 4.1 – Change in earned income for adult system stayers during the reporting period

Metric	Value
Universe: Number of adults (system stayers)	96
Number of adults with increased earned income	12
Percentage of adults who increased earned income	12.5%

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period

Metric	Value
Universe: Number of adults (system stayers)	96
Number of adults with increased non-employment cash income	19
Percentage of adults who increased non-employment cash income	19.8%

#### Metric 4.3 – Change in total income for adult system stayers during the reporting period

Metric	Value
Universe: Number of adults (system stayers)	96
Number of adults with increased total income	29
Percentage of adults who increased total income	30.2%

#### Metric 4.4 – Change in earned income for adult system leavers

Metric	Value
Universe: Number of adults who exited (system leavers)	36
Number of adults who exited with increased earned income	8
Percentage of adults who increased earned income	22.2%

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### Metric 4.5 – Change in non-employment cash income for adult system leavers

Metric	Value
Universe: Number of adults who exited (system leavers)	36
Number of adults who exited with increased non-employment cash income	10
Percentage of adults who increased non-employment cash income	27.8%

#### Metric 4.6 – Change in total income for adult system leavers

Metric	Value
Universe: Number of adults who exited (system leavers)	36
Number of adults who exited with increased total income	16
Percentage of adults who increased total income	44.4%

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### Measure 5: Number of Persons who Become Homeless for the First Time

This measures the number of people entering the homeless system through ES, SH, or TH (Metric 5.1) or ES, SH, TH, or PH (Metric 5.2) and determines whether they have any prior enrollments in the HMIS over the past two years. Those with no prior enrollments are considered to be experiencing homelessness for the first time.

##### Metric 5.1 – Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS

Metric	Value
Universe: Person with entries into ES-EE, ES-NbN, SH or TH during the reporting period.	989
Of persons above, count those who were in ES-EE, ES-NbN, SH, TH or any PH within 24 months prior to their entry during the reporting year.	183
Of persons above, count those who did not have entries in ES-EE, ES-NbN, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)	806

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

**Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS**

Metric	Value
Universe: Person with entries into ES, SH, TH or PH during the reporting period.	1,190
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	221
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)	969

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### **Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD's Homeless Definition in CoC Program-funded Projects**

Measure 6 is not applicable to CoCs in this reporting period.

#### **Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing**

This measures positive movement out of the homeless system and is divided into three tables: movement off the streets from Street Outreach (Metric 7a.1); movement into permanent housing situations from ES, SH, TH, and RRH (Metric 7b.1); and retention or exits to permanent housing situations from PH (other than PH-RRH).

##### **Metric 7a.1 – Change in SO exits to temp. destinations, some institutional destinations, and permanent housing destinations**

Metric	Value
Universe: Persons who exit Street Outreach	132
Of persons above, those who exited to temporary & some institutional destinations	29
Of the persons above, those who exited to permanent housing destinations	25
% Successful exits	40.9%

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### Metric 7b.1 – Change in ES, SH, TH, and PH-RRH exits to permanent housing destinations

Metric	Value
Universe: Persons in ES-EE, ES-NbN, SH, TH and PH-RRH who exited, plus persons in other PH projects who exited without moving into housing	904
Of the persons above, those who exited to permanent housing destinations	426
% Successful exits	47.1%

#### Metric 7b.2 – Change in PH exits to permanent housing destinations or retention of permanent housing

Metric	Value
Universe: Persons in all PH projects except PH-RRH who exited after moving into housing, or who moved into housing and remained in the PH project	220
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	190
% Successful exits/retention	86.4%

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### System Performance Measures Data Quality

Data coverage and quality will allow HUD to better interpret your SPM submissions.

Metric	All ES, SH	All TH	All PSH, OPH	All RRH	All Street Outreach
Unduplicated Persons Served (HMIS)	1,004	119	272	303	545
Total Leavers (HMIS)	571	68	50	92	69
Destination of Don't Know, Refused, or Missing (HMIS)	110	3	4	0	2
Destination Error Rate (Calculated)	19.3%	4.4%	8.0%	0.0%	2.9%



## 2024 HDX Competition Report

### 2024 Competition Report - SPM Notes

NC-504 - Greensboro, High Point CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### Notes For Each SPM Measure

Note: Cells may need to be resized to accomodate notes with lots of text.

Measure	Notes
Measure 1	No notes.
Measure 2	No notes.
Measure 3	No notes.
Measure 4	No notes.
Measure 5	No notes.
Measure 6	No Notes. Measure 6 was not applicable to CoCs in this reporting period.
Measure 7	No notes.
Data Quality	No notes.

## 2024 HDX Competition Report

### 2024 Competition Report - HIC Summary

NC-504 - Greensboro, High Point CoC

For HIC conducted in January/February of 2024

#### HMIS Bed Coverage Rates

Project Type	Total Year Round, Current Beds	Total Year Round, Current Beds in HMIS or Comparable Database	Total Year Round, Current, Non VSP Beds	Removed From Denominator: OPH EHV <sup>†</sup> Beds or Beds Affected by Natural Disaster*	Adjusted Total Year Round, Current, Non VSP Beds	Adjusted HMIS Bed Coverage Rate for Year Round, Current Beds
ES	390	304	359	0	359	84.7%
SH	6	6	6	0	6	100.0%
TH	61	61	61	0	61	100.0%
RRH	96	96	96	0	96	100.0%
PSH	2,161	352	2,161	0	2,161	16.3%
OPH	0	0	0	0	0	NA
<b>Total</b>	<b>2,714</b>	<b>819</b>	<b>2,683</b>	<b>0</b>	<b>2,683</b>	<b>30.5%</b>

## 2024 HDX Competition Report

### 2024 Competition Report

NC-504 - Greensboro, High Poi

For HIC conducted in January/I

### HMIS Bed Coverage Rates

Project Type	Total Year Round, Current Beds	Total Year Round, Current, VSP Beds in an HMIS-Comparable Database	Total Year Round, Current, VSP Beds	Removed From Denominator: OPH EHV <sup>†</sup> Beds or Beds Affected by Natural Disaster**	Adjusted Total Year Round Current, VSP Beds	HMIS Comparable Bed Coverage Rate for VSP Beds
ES	390	31	31	0	31	100.00%
SH	6	0	0	0	0	NA
TH	61	0	0	0	0	NA
RRH	96	0	0	0	0	NA
PSH	2,161	0	0	0	0	NA
OPH	0	0	0	0	0	NA
<b>Total</b>	<b>2,714</b>	<b>31</b>	<b>31</b>	<b>0</b>	<b>31</b>	<b>100.00%</b>

## 2024 HDX Competition Report

### 2024 Competition Report

NC-504 - Greensboro, High Poi

For HIC conducted in January/I

#### HMIS Bed Coverage Rates

Project Type	Total Year Round, Current Beds	Total Year Round, Current, HMIS Beds and VSP Beds in an HMIS-Comparable Database	Adjusted Total Year Round, Current, Non VSP and VSP Beds	HMIS and Comparable Database Coverage Rate
ES	390	335	390	85.90%
SH	6	6	6	100.00%
TH	61	61	61	100.00%
RRH	96	96	96	100.00%
PSH	2,161	352	2,161	16.29%
OPH	0	0	0	NA
<b>Total</b>	<b>2,714</b>	<b>850</b>	<b>2,714</b>	<b>31.32%</b>

## 2024 HDX Competition Report

### 2024 Competition Report - HIC Summary

NC-504 - Greensboro, High Point CoC

For HIC conducted in January/February of 2024

#### Rapid Re-housing Beds Dedicated to All Persons

Metric	2020	2021	2022	2023	2024
RRH beds available to serve all pops. on the HIC	80	189	172	79	96

1) † EHV = Emergency Housing Voucher

2) \*This column includes Current, Year-Round, Natural Disaster beds not associated with a VSP that are not HMIS-participating. For OPH Beds, this includes beds that are Current, Non-HMIS, and EHV-funded.

3) \*\*This column includes Current, Year-Round, Natural Disaster beds associated with a VSP that are not HMIS-participating or HMIS-comparable database participating. For OPH Beds, this includes beds that are Current, VSP, Non-HMIS, and EHV-funded.

4) Data included in these tables reflect what was entered into HDX 2.0.

5) In the HIC, "Year-Round Beds" is the sum of "Beds HH w/o Children", "Beds HH w/ Children", and "Beds HH w/ only Children". This does not include Overflow ("O/V Beds") or Seasonal Beds ("Total Seasonal Beds").

6) In the HIC, "Current" beds are beds with an "Inventory Type" of "C" and not beds that are Under Development ("Inventory Type" of "U").

7) For historical data: Aggregated data from CoCs that merged are not displayed if HIC data were created separately - that is, only data from the CoC into which the merge occurred are displayed. Additional reports can be requested via AAQ for any CoCs that have been subsumed into other CoCs.

## 2024 HDX Competition Report

### 2024 Competition Report - PIT Summary

NC-504 - Greensboro, High Point CoC

For PIT conducted in January/February of 2024

#### Submission Information

Date of PIT Count	Received HUD Waiver
1/24/2024	Not Applicable

#### Total Population PIT Count Data

Category	2019	2020	2021	2022	2023	2024
PIT Count Type	Sheltered and Unsheltered Count	Sheltered and Unsheltered Count	Sheltered and partial unsheltered count	Sheltered and Unsheltered Count	Sheltered and Unsheltered Count	Sheltered and Unsheltered Count
Emergency Shelter Total	459	359	379	286	367	376
Safe Haven Total	0	0	0	6	5	5
Transitional Housing Total	66	75	40	51	46	50
Total Sheltered Count	525	434	419	343	418	431
Total Unsheltered Count	61	190	63	83	34	234
Total Sheltered and Unsheltered Count*	586	624	482	426	452	665

1) \*Data included in this table reflect what was entered into HDX 1.0 and 2.0. This may differ from what was included in federal reports if the PIT count type was either sheltered only or partial unsheltered count.

2) Aggregated data from CoCs that merged is not displayed if PIT data were entered separately - that is, only data from the CoC into which the merge occurred are displayed. Additional reports can be requested via AAQ for any CoCs that have been subsumed into other CoCs.

3) In 2021, for CoCs that conducted a "Sheltered and partial unsheltered count", only aggregate and not demographic data were collected.

## **2024 HDX Competition Report**

### 2024 Competition Report - PIT Summary

NC-504 - Greensboro, High Point CoC

For PIT conducted in January/February of 2024

# INTERACTIVE RESOURCE CENTER

407 East Washington Street Greensboro NC 27401 336-662-50005

[Deonna@ircgso.org](mailto:Deonna@ircgso.org)

October 15, 2024

1. The Interactive Resource Center's health care organization's commitment for the

**A. Interactive Resource Center Rapid Re-Housing 2025** is as follows:

b. The value of commitment of healthcare resources being provided are

-Congregational Nurse for Behavioral Health - \$75,000 (yearly)

-CSWEI Social Work Interns in partnership with Cone Health - \$890,000 in-kind ROI for the IRC (September-March)

-Family Services of the Piedmont - \$80,000 (yearly)

*-Total value of commitment: \$1, 045,000*

c. Dates services provided

-Congregational Nurse for Behavioral Health – January – December 2025

-CSWEI – January – March 2025; September 2025-March 2026

-Family Services of the Piedmont – January – December 2025

d. Project Eligibility for participants in the **Interactive Resource Center's Rapid Re-Housing 2025** is based on the CoC Program fair housing requirements and is not restricted by the health care service provider. This



program does not discriminate against any individual seeking assistance based on race, color, religion, national origin, sex, age, familial status, or national origin. The IRC's mission, and that of the RRH program, is to provide equal access to housing opportunities for all eligible individuals.

Regards,

Deonna Kelli Sayed

Director of Development

# INTERACTIVE RESOURCE CENTER

## **Partner Services for Health Care and Resource Connection**

### **Congregational Nurse for Behavioral Health**

in collaboration with Cone Health Foundation and Guilford County: position open and being advertised.

### **CSWEI Social Work Intern Program in collaboration with Cone Health Foundation**

September – March

Current number of interns: 6 Bachelor of Social Work and 7 Master of Social Work students

Days of case management at the IRC: Tuesday-Friday

### **Family Services of the Piedmont**

One Nurse practitioner on-site: Wednesday and Thursdays

A Saturday clinic also occurs on the third Saturday from 9 am to noon.

Two Certified Medical Assistants: One is on-site Monday-Friday (9 am – 3 pm); another here Wednesday-Friday (9 am-3 pm).



# INTERACTIVE RESOURCE CENTER

*help & hope for those experiencing homelessness*

June 1, 2012

To Whom It May Concern:

The Congregational Nurse program and the Congregational Social Work Educational Initiative are the Interactive Resource Centers longest-standing partners and the ones that have most materially shaped the development of our program. From the very beginning CSWEI students and faculty have helped us with everything from developing intake and case management forms to doing hands-on case management for people with a broad variety of urgent needs. Since the IRC opened in January 2009 we have assisted over 4,500 homeless and near-homeless people. We could not have done that without our partnership with the CSWEI program.

In addition to the valuable service the CSWEI interns perform for the IRC and its clients, our collaboration has grown to include some other important elements that mean that the CSWEI Program is in and of itself community-based, providing co-located services with the Congregational Nurse Program.

- At the beginning of every academic year all CSWEI students, not just those who will have their placement at the IRC, do their Pre-Service training at the IRC.
- Fran Pearson, CSWEI Project Coordinator, holds undergraduate and graduate classes at the IRC.
- Fran also uses the IRC as her off-campus "home base", which means that she is at the IRC daily.

We are deeply grateful to everyone who has made the Congregational Nurse Program and the Congregational Social Work Educational Initiative Program possible. These extraordinary and groundbreaking programs save lives every day.

Sincerely yours,

Liz Seymour  
Executive Director

John Shore  
Chair, Board of Directors

**Cone Health  
Congregational Nurse Program  
Medication Policies for the Homeless**

1. All homeless clients should be set up with an appointment with Partnership for Health Management for Orange Card.
2. With current Orange Card, clients should be getting meds from Health Serve if established.
3. Congregational Nurse Program ability to assist with purchase of medications depends on gift revenue. It is not the responsibility of Cone Health to purchase meds.
4. **All patients must be listed on the CN medication logs provided. The logs need to be turned in to the office on a monthly basis for us to reconcile charges.**
5. In the interim until TAPM opens up, we can offer RX refill for consecutive months but clients need to be encouraged to get an appointment ASAP. It is not acceptable to utilize the Urgent Care for primary care and the CN Program for medications for convenience.

**A. Cone Outpatient Pharmacy**

1. Can get meds filled for homeless clients who have been seen at Urgent Care, Emergency Room or from a Cone provider if not connected with TAPM yet.
2. Will need:
  - a. Client name
  - b. Client address (use homeless site if needed)
  - c. Birth date
  - d. Phone number
3. Cost of meds is being billed at this point to the CN cost center. In May 2012, we had \$2000 to draw on.
4. **CANNOT PICK UP SCHEDULE II NARCOTICS!!!** Can give the client bus passes to go to Outpatient Pharmacy and show them the Orange Card (will honor). To try to pick up narcotics and transport for client is illegal per Darrell (Outpatient Manager) and places the RN in legal jeopardy.
5. We cannot honor a prescription over \$50 in order to maximize the number we can serve. CN may need to call MD and negotiate for a generic alternative.

**B. Outside Pharmacies**

1. I understand that there are still RX that come from other sources (jail, ADS, etc) that do not interact with Cone provider.
2. We will provide Wal Mart cards but please use sparingly. Again, we cannot approve an individual RX for over \$50. Some recent examples were many hundreds of dollars per prescription that we do not have the resources to honor.
3. Again, a CN **CANNOT PICK UP SCHEDULE II NARCOTICS AND DELIVER TO CLIENT.**

**CONE HEALTH Congregational Nurse Program  
Homeless Pharmacy Stop Gap Medication Assistance  
Policies and Procedures**

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Department	Original Effective Date	Revised Date
Congregational Nurse	June 2012	
Authorization	Subject	Page

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To improve the process of providing Homeless Patients with medications when while waiting to get the orange card, waiting to get Medicaid or waiting to get into a primary care physician. The overall goal is to reduce emergency room visits and worsening of chronic conditions for those who have limited access to health care.

1. The patient must have been seen by a Cone Health Facility within the last 14 days.
2. The patient gives the nurse the prescription
3. The Congregational Nurse gets the Date of Birth and an address for the patient as well as a phone number when available. If no address, please use the Interactive Resource Center as the address.
4. The Congregational Nurse takes the prescription to the Cone Employee Pharmacy and identifies this as a Congregational Nurse prescription.
5. A Congregational Nurse will pick up the prescription 24 hours later.
6. The patient should pick the medication up from the nurse as soon as is feasible.
7. The Congregational Nurse will record the patient name and other information on the Medication Log.
8. Medication Logs will be turned into the Congregational Nurse Program every 30 days. This is required in order to balance our financial records.
9. Patients are eligible for assistance while waiting a reasonable amount of time for an appointment with health serve, for Medicaid eligibility, or orange card receipt.
10. This is a limited process.
11. This procedure will not cover the cost of narcotic pain medications. The Congregational Nurse should not be involved in the receipt of pain medications. The patient is responsible for the prescription and the costs associated with pain medications.
12. This can not be used for ongoing medications for someone who does not take advantage of the Community processes in place to assist those with financial needs in regard to health care.
13. For those not seen at a Cone Health Facility, there will be limited assistance by the use of a WalMart gift card. These will be monitored on a case by case basis. Please use the Medication Log and denote GC beside the date as well as an asterick.

## Important CSWEI Dates

What: Monthly staff meeting

When: 8:00 am -10:00 am on Thursday 9/30, 10/28, 11/18, 12/2

Where: 269 Stone Building

Who attends: All CSWEI interns

### BSW Seminar

When: 8:00-9:45 am

Wednesdays: 9/15, 9/29, 10/13, 10/27, 11/10, 11/17, 12/1

Where: 174 Stone Building

### MSW Seminar

When: 10:30-12:30

Where: 174 Stone Building

Thursdays and Fridays

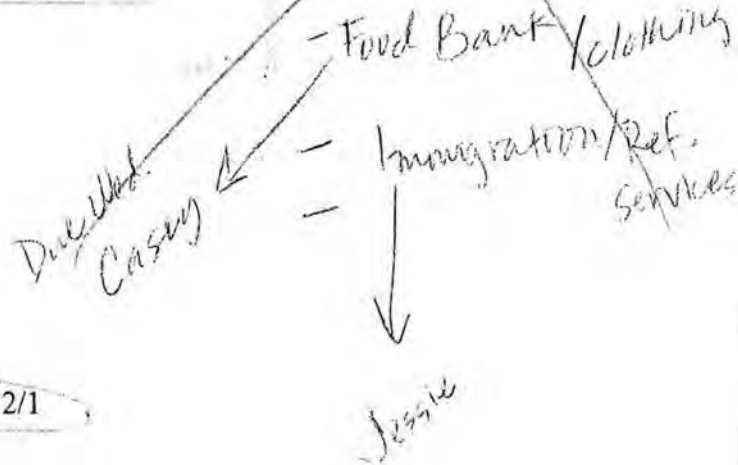
9/23 THR, 10/8 FRI, 10/21 THR, 11/4 THR, 11/12 FRI, 11/19 FRI, 12/3 FRI

\*\*Capstone dates: 10/8 [Multicultural Competence], 11/12 [Indirect Practice], 12/10 [Direct Practice]. \*\*Dates are negotiable

Mandatory JMSW Agency Fair: October 29, 2010 from 10-12 @ UNCG

Community Dental Clinic: Friday 11/5 and Saturday 11/6

- job services
- housing
- medical / med. ass.
- churches (EAP firm)
- consumer credit (cous)
- SA treatment programs (cald. / adm serv.) (bridge way)





THE JOINT  
**MASTER OF SOCIAL WORK**  
PROGRAM



THE UNIVERSITY OF NORTH CAROLINA AT GREENSBORO

**2010 - 2011 JMSW FIELD INSTRUCTION CALENDAR  
(ADVANCED YEAR STUDENTS)**

Thursday, August 12, 2010	9:00 a.m. - 5:00 p.m.	<b>Field Instructor Training Elliott University Center (EUC), Alexander Room #055 UNCG Campus</b>
Wednesday, August 25	9:00 a.m. - 12 noon	<b>Field Instruction Orientation AND FIRST DAY OF FIELD (ALL students, field instructors and faculty liaisons attend) Student Memorial-Union Exhibit Hall NCA &amp; T Campus</b>
Friday, September 17		<b>Student Learning Contract Due</b>
Friday, October 29	10:00 a.m. - 12:00 p.m.	<b><u>Agency Fair</u> Elliott University Center (EUC) Cone Ballroom A/B #136 UNCG Campus</b>
October 11-12		<b>FALL BREAK</b>
November 24-26		<b>THANKSGIVING BREAK</b>
Friday, December 3		<b>LAST DAY OF FIELD INSTRUCTION for FALL SEMESTER</b>
		<b>FIELD EVALUATIONS DUE</b>
Thursday, December 9	9:00 a.m. - 5:00 p.m.	<b>Field Instructor Training</b>

Friday, December 10

Stallings Ballroom-B  
NCA & T Campus

FINAL GRADES DUE

Wednesday, January 12, 2011

FIELD INSTRUCTION BEGINS

March 8-12

SPRING BREAK

April 22

SPRING HOLIDAY

Thursday, April 21

LAST DAY OF FIELD  
INSTRUCTION  
AND

9:00 a.m. – 11:00 a.m.

End of the Year Celebration  
Location: TBA

FINAL EVALUATIONS DUE

Wednesday, April 27

FINAL GRADES DUE

**NOTE TO STUDENTS:** Faculty liaisons will provide dates, times and meeting location for Seminar Class.



**Memorandum of Understanding  
Between  
Interactive Resource Center  
And  
Family Service of the Piedmont, Inc.**

The purpose of this Memorandum of Understanding (MOU) between Interactive Resource Center (IRC) and Family Service of the Piedmont (Agency) is to form a partnership/collaborative whereby Agency provides primary medical care services within IRC facilities.

**WITNESSETH:**

WHEREAS, IRC offers space within its facility to Agency; and

WHEREAS, Agency offers primary medical care and coordination of care to clients of IRC who are unable to pay for said services and meet eligibility criteria; and

WHEREAS, both parties have made a commitment to collaborate in providing services to Agency clients.

THEREFORE, IRC agrees to:

1. Provide office space to Agency adequate to operate a primary care clinic;
2. Provide infrastructure support such as telephone service and other utilities;
3. Provide access to IT spaces as needed by authorized Agency personnel for the purpose of ensuring Agency IT infrastructure functionality;
4. Provide Agency personnel access to clinic office space as needed.

Agency agrees to:

1. Provide primary medical services for eligible clients of IRC at IRC's facility at 407 E. Washington Street in Greensboro.
2. With client permission, coordinate care with IRC Case Managers or other staff as designated. Permission will be in the form of a consent to release information to communicate between IRC and Agency; and
3. Provide IRC with clinic schedules

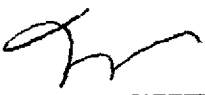
Each party hereto recognizes the expertise and value of the other, and agrees to work together for the good of all clients within our respective services areas.

IN WITNESS WHEREOF, IRC and the Agency have executed the MOU with an effective date of the 1<sup>st</sup> of January, 2016.

**INTERACTIVE RESOURCE CENTER**

By:   
\_\_\_\_\_  
Michelle Kennedy, Executive Director

**FAMILY SERVICE OF THE PIEDMONT, INC. (Agency)**

By:   
\_\_\_\_\_  
Thomas F. Campbell/President/CEO

**Memorandum of Understanding  
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**INTERACTIVE RESOURCE CENTER**

By:  \_\_\_\_\_  
Michelle Kennedy, Executive Director

**FAMILY SERVICE OF THE PIEDMONT, INC. (Agency)**

By: \_\_\_\_\_  
Thomas F. Campbell/President/CEO



## Healthcare Formal Agreements

RE: The Servant Center's Rapid Rehousing Program (Fast Track) Expansion

To Whom it May Concern:

The Servant Center operates the largest Rapid Rehousing (RR) program in Guilford County, N.C. called Fast Track. The Servant Center has requested an expansion from HUD to enable us to serve additional persons from the COC's By-Name list which currently has more than 200 individuals waiting for Rapid Rehousing services. This expansion will focus on those that are medically fragile.

The Servant Center's Rapid Rehousing staff work with clients to overcome obstacles to housing stability including health, mental health and substance abuse issues. Staff refer clients to many community partners to address these issues including:

- Triad Health Project: HIV and AID services
- Cone Community Health: primary care for un or under insured individuals
- VA: healthcare, mental health services, and in and outpatient substance abuse services
- Family Service of the Piedmont: DV and mental health counseling
- Daymark: out and in patient substance abuse services
- Guilford County Department of Public Health: children's vaccinations
- Guilford County Behavioral Health: outpatient mental health

In addition to these partnerships, The Servant Center has three formal agreements (see attached) with healthcare systems that benefit our RR program.

- (1) The Servant Center has a contract with Cone Health System to fund the County's only dedicated SOAR (SSI/SSDI, Outreach, Access, and Recovery) staff who are employed by The Servant Center. Our RR staff routinely refer their disabled clients to our SOAR program. In addition to helping the client file for SSI/SSDI, SOAR staff will also help the client to file for Medicaid and Food Stamps as needed. This is a per-application contract, but in fiscal year 23-24 Cone paid \$76,000 for SOAR services.

The other two contracts are with the VA Healthcare system and are veteran specific. The Servant Center manages the Guilford County Veteran By-Name list and facilitates the weekly meetings with GPD providers, RR providers, PSH providers and VA staff. Last year, 28% of the Fast Track Rapid Rehousing clients were veterans.

- (2) The Servant Center has a contract with the VA Health System (Health Care for Homeless Veterans – HCHV) for the operation of a transitional housing program, called Servant House. This program has 21 beds under the VA's Hospital to Housing model. This program specifically serves disabled veterans who are experiencing homelessness. This is a per night grant, and the VA paid \$362,176 last program year. The Fast Track program often serves clients referred from Servant House and the VA Social Worker and VASH case managers work closely with RR staff to house all the veterans on their case load and to ensure they are connected to VA healthcare, mental health services and substance abuse services.
- (3) The Servant Center also has a grant with the VA Health System under HCHV to provide housing stability case management to veterans who were housed but are at risk of returning to homelessness. We have referred exited RR clients to this program and those clients have been stabilized and were able to remain in housing. The grant is for \$169,495 for a two year period.

Sincerely,

  
Shanna T. Reece



### Housing Leveraging Commitment

RE: The Servant Center's Rapid Rehousing Program (Fast Track) Expansion

To Whom it May Concern:

The Servant Center is a faith-based nonprofit that operates the largest Rapid Rehousing program in Guilford County, N.C. called Fast Track. The Servant Center has requested an expansion from HUD to enable us to serve additional persons from our By-Name list which currently has more than 200 individuals waiting for Rapid Rehousing services. This expansion will focus on those that are medically fragile.

Our RR program is largely funded by HUD, NC DHHS (ESG) and City of Greensboro (ESG); however, we do have some private funding from Lincoln Financial, Bank of America and private donations to support the program. The program is expected to serve 275 people over the course of the program year. It is estimated that private funds will support 11% of the total clients expected to be served by Fast Track.

See estimated budget below:

Donations	\$ 12,854.00
HUD/ESG	\$ 421,119.00
Bank of America	\$ 7,500.00
Lincoln Financial	\$ 22,000.00
<b>Total Budget</b>	<b>\$ 463,473.00</b>
<b>Non-HUD Amt Leveraged</b>	<b>\$ 42,354.00</b>

A copy of the grant award from Lincoln Financial and Bank of America is attached. The Servant Center commits to providing \$42,354 in private donations to support the Rapid Rehousing program. This funding will be available during the project's period of performance.

The Servant Center will continue to seek non-HUD resources to expand its Fast Track program.

Sincerely,

Shanna T. Reece

The Moses H. Cone Memorial Hospital Operating Corporation d/b/a Cone Health  
Contract for Services  
with The Servant Center, Inc.

This Contract for Services (the "Contract") is entered into by and between The Servant Center ("TSC") and The Moses H. Cone Memorial Hospital Operating Corporation d/b/a Cone Health ("Cone Health"). The term of this Contract shall begin on October 1, 2024, and shall continue through September 30, 2025. This Contract will automatically renew for successive one (1) year periods unless either party provides sixty days' notice of nonrenewal. This Contract may be terminated at any time by either party without cause upon sixty (60) days' prior written notice.

TSC and Cone Health desire to assist patients of Cone Health (and its affiliates) in applying for and obtaining social security benefits for the purpose of obtaining Medicaid disability benefits ("SSI/SS DI").

The specific terms of this Contract are as follows:

1. Cone Health will refer patients to TSC for assistance in completing the Social Security benefits application.
2. TSC agrees to accept and process Social Security applications and conduct necessary follow-up activities associated with the completion of such applications.
3. TSC agrees to provide ongoing training/education to Cone Health staff regarding the referral process as requested by Cone Health.
4. By the fifth day of each month during the term of this Contract, TSC will provide a report which shall include the following information for cases pending from the prior month:
  1. Client Name
  2. Medical Record #
  3. Interview Date
  4. Referral Source
  5. Date Claim Filed
  6. Current Status of Case - Pending, Approved or Denied
    - a. Initial
    - b. Reconsideration
  7. Denial or Approval Dates
5. Cone Health shall pay TSC a fee for each "Successful Application" by TSC during the preceding month. For purposes of this Contract, the term "Successful Application" shall mean an SSI/SSDI application completed by TSC on behalf of a Patient. TSC shall submit monthly invoices to Cone Health in accordance with Section 6 hereof. The fee schedule is as follows:
  - a. SOAR – For clients who are homeless and filed under The Substance Abuse and



Mental Health Service Administration's SOAR (SSI/SSDI, Outreach, Access, and Recovery) model, the fee per submission will be \$1,600 per submission.

- b. For clients who are not filed under the SOAR model, the fee per initial submission will be \$700 per submission.
  - c. The fee for reconsiderations for SOAR and non-SOAR claims will be \$350 per submission.
6. The Servant Center will submit monthly invoices which will include:
    1. Patient Name
    2. Medical Record Number
    3. Proof of Application Submitted to the Social Security Administration
  7. Invoices are expected to be paid by Cone Health to TSC within 30 days of receipt.
  8. The parties shall simultaneously execute a Business Associate Agreement, incorporated herein in full as Exhibit A. Any breach of the Business Associate Agreement by TSC shall be grounds for immediate termination of this Contract by Cone Health.
  9. TSC represents and warrants that it is not (i) currently excluded, debarred, or otherwise ineligible to participate in the Federal health care programs as defined in 42 U.S.C. § 1320a-7b(f) (the "Federal health care programs"); (ii) convicted of a criminal offense related to the provision of health care items or services but has not yet been excluded, debarred, or otherwise declared ineligible to participate in the Federal health care programs; and (iii) under investigation or otherwise aware of any circumstances which may result in it being excluded from participation in the federal health care programs. This shall be an ongoing representation and warranty during the term of this Contract and TSC shall immediately notify Cone Health of any change in the status of the representation and warranty set forth in this Section. Any breach of this Section shall give Cone Health the right to terminate this Contract immediately for cause.
  10. As and to the extent required by law, upon the written request of the Secretary of Health and Human Services, the Comptroller General or any of their duly authorized representatives, each party shall make available, as may be applicable, those contracts, books, documents and records necessary to verify the nature and extent of the costs of providing services under this Contract. Such inspection shall be available for up to four (4) years after the rendering of such services. If a party is requested to disclose books, documents or records pursuant to this Section for any purpose, the party shall notify the other party of the nature and scope of such request, and the party shall make available, upon written request of the other party, all such books, documents or records. If a party carries out any of the duties of this Contract through a subcontract with a value of \$10,000.00 or more over a twelve (12) month period with a related individual or organization, such party agrees to include this requirement in any such subcontract. This section is included pursuant to and is governed by the requirements to 42 U.S.C. § 1395x(v)(l) and the regulations thereto.

11. Any notice required or desired to be given in respect to this Contract shall be deemed to be given upon the earlier of (i) actual delivery to the intended recipient or its agent; or (ii) upon the third business day following deposit in the United States mail, postage prepaid, certified or registered mail, returned receipt requested. Any such notice shall be delivered to the respective addresses set out on the signature page hereof.
12. Neither party shall assign this Contract or any interest therein unless the other party agrees in writing to such assignment.
13. The parties are performing services and duties under this Contract as independent contractors and not as employees, agents, partners, or joint venturers.
14. This Contract shall be governed by the laws of the state of North Carolina.
15. This Contract may be signed by the parties in counterparts, each of which shall be deemed an original, and all of which together shall constitute one and the same instrument.
16. No delay or failure to require performance of any provision of this Contract shall constitute a waiver of that provision as to that or any other instance. Any waiver granted by a party must be in writing to be effective and shall apply solely to the specific instance expressly stated.

In witness whereof, each party to this agreement has caused the agreement to be executed by its duly authorized office the date and year set forth herein,

The Moses H. Cone Memorial Hospital  
Operating Corporation d/b/a Cone Health

Signed by:  
Jason Nelms  
84401A8E7A6D84FC...  
Jason Nelms, Vice President, Revenue Cycle

8/27/2024

The Servant Center

Signed by:  
Shanna T. Reece  
776BF9C5E07845A...  
Shanna T. Reece, Executive Director

8/27/2024

**EXHIBIT A**  
**BUSINESS ASSOCIATE AGREEMENT**

This Business Associate Agreement (the “Agreement”) is made effective the 27th day of August 2024, by and between **Cone Health**, as defined below and hereinafter referred to as “Covered Entity,” and **The Servant Center** hereinafter referred to as “Business Associate” (individually, a “Party” and collectively, the “Parties”).

WITNESSETH:

WHEREAS, Cone Health is an organized health care arrangement comprised of The Moses H. Cone Memorial Hospital Operating Corporation, Alamance Regional Medical Center, Inc. and other affiliated providers under common control with them, including without limitation Moses Cone Medical Services, Inc., Moses Cone Physician Services, Inc., Moses Cone Affiliated Physicians, Inc., and ARMC Physicians Care, Inc.; and

WHEREAS, the Parties wish to enter into a Business Associate Agreement to ensure compliance with the Privacy and Security Rules and the Breach Notification Rule of the Health Insurance Portability and Accountability Act of 1996 (“HIPAA Privacy and Security Rules”) (45 C.F.R. Parts 160 and 164); and

WHEREAS, the Health Information Technology for Economic and Clinical Health (“HITECH”) Act of the American Recovery and Reinvestment Act of 2009, Pub. L. 111-5, modified the HIPAA Privacy and Security Rules (hereinafter, all references to the “HIPAA Privacy and Security Rules” include all amendments thereto set forth in the HITECH Act and any accompanying regulations); and

WHEREAS, the Parties have entered into a written or oral arrangement or arrangements (the “Underlying Agreements”) whereby Business Associate will provide certain services to Covered Entity that require Business Associate to create, receive, maintain, or transmit Protected Health Information on Covered Entity’s behalf, and accordingly Business Associate may be considered a “business associate” of Covered Entity as defined in the HIPAA Privacy and Security Rules; and

WHEREAS, Business Associate and Covered Entity wish to comply with the HIPAA Privacy and Security Rules, and Business Associate wishes to honor its obligations as a Business Associate to Covered Entity.

THEREFORE, in consideration of the Parties’ new or continuing obligations under the Underlying Agreements, and for other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree to the provisions of this Agreement.

Except as otherwise defined herein, any and all capitalized terms in this Agreement shall have the definitions set forth in the HIPAA Privacy and Security Rules. In the event of an inconsistency between the provisions of this Agreement and mandatory provisions of the HIPAA Privacy and Security Rules, the HIPAA Privacy and Security Rules in effect at the time shall control. Where provisions of this Agreement are different than those mandated by the HIPAA Privacy and Security Rules, but are nonetheless permitted by the HIPAA Privacy and Security Rules, the provisions of this Agreement shall control.

I. PERMITTED USES AND DISCLOSURES BY BUSINESS ASSOCIATE

a. Business Associate may use or disclose Protected Health Information to perform functions, activities, or services for, or on behalf of, Covered Entity as specified in the Underlying Agreements,

provided that such use or disclosure would not violate the HIPAA Privacy and Security Rules if done by Covered Entity.

b. Business Associate may use Protected Health Information in its possession for its proper management and administration and to fulfill any present or future legal responsibilities of Business Associate, provided that such uses are permitted under state and federal confidentiality laws.

c. Business Associate may disclose Protected Health Information in its possession to third parties for the purposes of its proper management and administration or to fulfill any present or future legal responsibilities of Business Associate, provided that:

1. the disclosures are required by law; or
2. Business Associate obtains reasonable assurances from the third parties to whom the Protected Health Information is disclosed that the information will remain confidential and be used or further disclosed only as required by law or for the purpose for which it was disclosed to the third party, and that such third parties will notify Business Associate of any instances of which they are aware in which the confidentiality of the information has been compromised or breached.

d. When accessing, using, or disclosing Protected Health Information, or when requesting Protected Health Information from another covered entity or business associate, Business Associate will make reasonable efforts to limit PHI to the minimum necessary to accomplish the intended purpose of the access, use, disclosure, or request. Should the amount of Protected Health Information needed by Business Associate change over the course of the Underlying Agreements, the parties will make the necessary adjustments. Business Associate will also take measures to ensure that its workforce members and subcontractors only have access to the minimum Protected Health Information necessary to perform their duties under this Agreement. Such measures include periodically reviewing the access rights of those accessing the Protected Health Information to verify they are appropriate, keeping and reviewing audit logs of such access, and terminating access as appropriate.

## II. OBLIGATIONS AND ACTIVITIES OF BUSINESS ASSOCIATE

a. Business Associate agrees not to use or further disclose Protected Health Information other than as permitted or required by this Agreement or the Underlying Agreements or as required by law. Business Associate further agrees not to take any action that, if done by Covered Entity, would constitute information blocking prohibited by 45 C.F.R. Part 171.

b. Business Associate agrees to use appropriate safeguards and to comply, where applicable, with 45 C.F.R. Part 164, Subpart C with respect to Electronic Protected Health Information, to prevent use or disclosure of Protected Health Information other than as provided for by this Agreement. Specifically, Business Associate will:

1. implement the administrative, physical, and technical safeguards set forth in 45 C.F.R. §§ 164.308, 164.310, and 164.312 that reasonably and appropriately protect the confidentiality, integrity, and availability of any Protected Health Information that it creates, receives, maintains, or transmits on behalf of Covered Entity, and, in accordance with 45 C.F.R. § 164.316, implement and maintain reasonable and appropriate policies and procedures to enable it to comply with the requirements outlined in 45 C.F.R. §§ 164.308, 164.310, and 164.312; and

2. report to Covered Entity any Security Incident that does not rise to the level of a Breach of Unsecured Protected Health Information, and any use or disclosure of Protected Health Information that is not provided for by this Agreement but that does not rise to the level of a Breach, of which Business Associate becomes aware. The report shall be made as soon as practical, and in any event within twenty (20) days of Business Associate's discovery of the Security Incident or the impermissible use or disclosure.

c. Business Associate shall require each subcontractor that creates, receives, maintains, or transmits Protected Health Information on its behalf to enter into a business associate agreement containing the same restrictions on access, use, and disclosure of Protected Health Information as those applicable to Business Associate under this Agreement. Furthermore, to the extent that Business Associate provides Electronic Protected Health Information to a subcontractor, Business Associate shall require such subcontractor to comply with all applicable provisions of 45 C.F.R. Part 164, Subpart C. Business Associate agrees to disclose to subcontractors who create, receive, maintain, or transmit Protected Health Information on behalf of Business Associate only that Protected Health Information which is necessary to perform the services required under the Underlying Agreements. Business Associate will monitor compliance by its subcontractors and, if necessary, terminate the arrangements as required under 45 C.F.R. § 164.504(e)(1)(iii).

d. Business Associate agrees to comply with any requests for restrictions on certain disclosures of Protected Health Information to which Covered Entity has agreed in accordance with 45 C.F.R. § 164.522 of which Business Associate has been notified by Covered Entity.

e. If Business Associate maintains a designated record set on behalf of Covered Entity, at the request of Covered Entity, Business Associate agrees to make available Protected Health Information required for Covered Entity to respond to an individual's request for access to his or her Protected Health Information in accordance with 45 C.F.R. § 164.524 and 45 C.F.R. Parts 170 and 171 and the requirements set forth therein. If Business Associate maintains Protected Health Information in an electronic designated record set, it agrees to make such Protected Health Information available electronically to Covered Entity or, upon Covered Entity's specific request, to the applicable individual or to a person or entity specifically designated by such individual in accordance with 45 C.F.R. § 164.524 and 45 C.F.R. Parts 170 and 171. Business Associate shall provide such access within ten (10) business days of Business Associate's receipt of such request; however, if Business Associate determines, in accordance with 45 C.F.R. § 171.204, that it is infeasible to provide the requested access, it shall provide to Covered Entity in writing the reason(s) why the request is infeasible within five (5) business days of receipt of the request.

f. If Business Associate maintains a designated record set on behalf of Covered Entity, at the request of Covered Entity, Business Associate agrees to make available Protected Health Information required for amendment by Covered Entity in the time and manner requested by Covered Entity for purposes of Covered Entity's compliance with the requirements of 45 C.F.R. § 164.526.

g. Business Associate agrees to document any disclosures of Protected Health Information, and to make such documentation available to Covered Entity for purposes of Covered Entity's compliance with the accounting of disclosures requirements set forth in 45 C.F.R. § 164.528.

h. If Business Associate is to carry out one or more of Covered Entity's obligations under 45 C.F.R. Part 164, Subpart E, Business Associate shall comply with the requirements of Subpart E that apply to Covered Entity in the performance of such obligation(s).

i. Business Associate agrees that it will make its internal practices, books, and records relating to the use and disclosure of Protected Health Information received from, or created or received by Business Associate on behalf of, Covered Entity, available to the Secretary, in a time and manner designated by the Secretary, to enable the Secretary to determine Business Associate's or Covered Entity's compliance with the HIPAA Privacy and Security Rules. Business Associate also shall cooperate with the Secretary and, upon the Secretary's request, pursuant to 45 C.F.R. § 160.310, shall disclose Protected Health Information to the Secretary to enable the Secretary to investigate and review Business Associate's or Covered Entity's compliance with the HIPAA Privacy and Security Rules.

j. Should Business Associate transmit PHI over public or wireless networks or store PHI on mobile devices, portable backup media, or in the cloud, Business Associate shall provide for encryption of PHI in transmission and/or at rest.

k. During the term of this Agreement, Business Associate, at its sole cost and expense shall provide cyber liability insurance coverage in the minimum amount of \$1,000,000. If such insurance is on a "claims made" basis, and such coverage is later terminated or converted to "occurrence" coverage (or vice versa), the Business Associate shall also acquire "prior acts" or "tail" coverage (as applicable) in the above amount covering all periods during which this Agreement is or has been in force. The Business Associate shall deliver a copy of the policy or policies, or at the election of the Covered Entity, a certificate or certificates, reflecting such coverage and shall instruct and obtain the consent of such insurer or insurers to provide prior written notice to the Covered Entity (equal to notice given to Business Associate) of the non-renewal, cancellation, proposed cancellation or material change in such insurance for any cause. The Business Associate shall provide the Covered Entity with notice of any breaches, claims, or events that could reasonably be anticipated to give rise to a claim under the Business Associate's cyber liability insurance coverage. The cyber liability insurance policy shall be issued by an insurance company which has an AM Best rating of no less than "A-" and which shall be licensed to conduct business in the State of North Carolina. The Covered Entity shall not be required to provide such insurance nor shall the Covered Entity be liable for the payment of any premiums on such insurance.

l. Business Associate represents and warrants that it will provide appropriate training about privacy and security safeguards to its workforce members and will require the same of its subcontractors who use, disclose, access, or maintain Protected Health Information. Business Associate further represents and warrants that it has appropriate policies and procedures addressing proper privacy and security practices in compliance with the HIPAA Privacy and Security Rules.

m. Neither Business Associate, nor its subcontractors or agents, will create, receive, transmit, maintain, disclose, access, or otherwise handle Protected Health Information outside of the United States without the express prior written consent of Covered Entity. If the foregoing restriction is violated, Covered Entity will have an immediate right of termination and a right of recourse and recovery against Business Associate due to irreparable harm, including entitlement to an injunction without bond. Business Associate, its subcontractors, and its agents will be jointly and severally liable for any violation of this restriction, and Business Associate will fully indemnify Covered Entity for any damages, liability, costs, or fees (including reasonable attorneys' fees) incurred by Covered Entity related thereto. Business Associate, on behalf of itself and its subcontractors and agents, acknowledges that it is subject to the laws of the United States, to the jurisdiction of the Secretary of Health and Human Services, and to the jurisdiction and venue of the courts and agencies of the United States.

n. The following persons are the contacts at Business Associate designated for privacy and security:

Privacy Contact	Security Contact
Name: Shanna T. Reece	Name: Shanna T. Reece
Title: Executive Director	Title: Executive Director
Phone Number: 336-275-8585 x 504	Phone Number: 336-275-8585 x 504
Email: sreece@theservantcenter.org	Email: sreece@theservantcenter.org
Address: 1417 Glenwood Avenue, Greensboro, NC 27403	Address: 1417 Glenwood Avenue, Greensboro, NC 27403

III. BUSINESS ASSOCIATE’S MITIGATION AND BREACH NOTIFICATION OBLIGATIONS

a. Business Associate agrees to mitigate, to the extent practicable, any harmful effect that is known to Business Associate of a use or disclosure of Protected Health Information by Business Associate in violation of the requirements of this Agreement. In addition, Business Associate will take appropriate measures in response to a privacy and security incident, including, but not limited to, education, disciplinary action, and issuing new or revising existing processes and safeguards.

b. Following the discovery of a Breach, Business Associate shall notify Covered Entity of such Breach without unreasonable delay and in no case later than ten (10) calendar days after discovery of the Breach, and shall assist in Covered Entity’s breach analysis process, including risk assessment, if requested. A Breach shall be treated as discovered by Business Associate as of the first day on which such Breach is known to Business Associate or, through the exercise of reasonable diligence, would have been known to Business Associate. The Breach notification shall be provided to Covered Entity in the manner specified in 45 C.F.R. § 164.410(c) and shall include the information set forth therein to the extent known. If, following the Breach notification, Business Associate learns additional details about the Breach, Business Associate shall notify Covered Entity promptly as such information becomes available. If notification to a third party is required under the HIPAA Privacy and Security Rules is required, the parties will cooperate in issuing any required notices, including determining who should give the notice, and will comply with the notification requirements relating to the individual, the media, and the Secretary. In any case, Business Associate will not issue any notices relating to Breach of the Protected Health Information without first notifying the Chief Privacy Officer of the Covered Entity at least five (5) business days in advance.

c. Business Associate will allow reasonable access to its data center(s), or related locations, by Covered Entity, its agents and subcontractors, for the purpose of identifying, collecting, assessing and/or providing to regulators and law enforcement potentially relevant digital evidence in connection with any suspected or actual unauthorized use or disclosure of Protected Health Information.

d. Business Associate shall bear all of Covered Entity’s costs arising from any Breach under the HIPAA Privacy and Security Rules and resultant notifications, if applicable, when the Breach arises from Business Associate’s negligence, willful misconduct, violation of law, violation of the Underlying Agreements, or violation of this Agreement.

e. These duties are in addition to any duties that Business Associate may have under the HIPAA Privacy and Security Rules.

#### IV. OBLIGATIONS OF COVERED ENTITY

a. Upon request of Business Associate, Covered Entity shall provide Business Associate with the notice of privacy practices that Covered Entity produces in accordance with 45 C.F.R. § 164.520.

b. Covered Entity shall provide Business Associate with any changes in, or revocation of, permission by an individual to use or disclose Protected Health Information, if such changes or revocation could reasonably be expected to affect Business Associate's permitted or required uses and disclosures.

c. Covered Entity shall notify Business Associate of any restriction on the use or disclosure of Protected Health Information to which Covered Entity has agreed in accordance with 45 C.F.R. § 164.522, and Covered Entity shall inform Business Associate of the termination of any such restriction, and the effect that such termination shall have, if any, upon Business Associate's use and disclosure of such Protected Health Information.

#### V. TERM AND TERMINATION

a. Term. This Agreement shall be effective as of the date first written above, and shall terminate upon the later of the following events: (i) in accordance with Section V.c., when all of the Protected Health Information provided by Covered Entity to Business Associate or created or received by Business Associate on behalf of Covered Entity is returned to Covered Entity or destroyed (and a certificate of destruction is provided) or, if such return or destruction is infeasible, when protections are extended to such information; or (ii) upon the expiration or termination of the last of the Underlying Agreements.

b. Termination. Upon either Party's knowledge of a material breach by the other Party of its obligations under this Agreement, the non-breaching Party shall, within twenty (20) days of that determination, notify the breaching Party, and the breaching Party shall have thirty (30) days from receipt of that notice to cure the breach or end the violation. If the breaching Party fails to take reasonable steps to effect such a cure within such time period, the non-breaching Party may terminate this Agreement and the Underlying Agreements without penalty.

Where either Party has knowledge of a material breach by the other Party and determines that cure is infeasible, prior notice is not required, and the non-breaching Party shall terminate the portion of the Underlying Agreements affected by the breach without penalty.

c. Effect of Termination.

1. Except as provided in paragraph 2 of this subsection c., upon termination of this Agreement, the Underlying Agreements or upon request of Covered Entity, whichever occurs first, Business Associate shall return or destroy all Protected Health Information received from Covered Entity, or created or received by Business Associate on behalf of Covered Entity. This provision shall apply to Protected Health Information that is in the possession of subcontractors of Business Associate. Neither Business Associate nor its subcontractors shall retain copies of the Protected Health Information except as required by law.

2. In the event that Business Associate determines that returning or destroying the Protected Health Information is infeasible, Business Associate shall provide within ten (10) days



to Covered Entity notification of the conditions that make return or destruction infeasible. Business Associate and its applicable subcontractors shall extend the protections of this Agreement to such Protected Health Information and limit further uses and disclosures of such Protected Health Information to those purposes that make the return or destruction infeasible, for so long as Business Associate and its applicable subcontractors maintain such Protected Health Information.

## VI. MISCELLANEOUS

a. Indemnification. Each Party shall indemnify and hold the other harmless from and against all claims, liabilities, judgments, fines, assessments, penalties, awards, or other expenses, of any kind or nature whatsoever, including, without limitations, attorneys' fees, expert witness fees, and costs of investigation, litigation or dispute resolution, relating to or arising out of any breach of this Agreement by that Party or its subcontractors or agents or Breach under the HIPAA Privacy and Security Rules caused by that Party or its subcontractors or agents.

b. No Rights in Third Parties. Except as expressly stated herein or in the HIPAA Privacy and Security Rules, the Parties to this Agreement do not intend to create any rights in any third parties.

c. Survival. The obligations of Business Associate under Section V.c. of this Agreement shall survive the expiration, termination, or cancellation of this Agreement, the Underlying Agreements, and/or the business relationship of the Parties, and shall continue to bind Business Associate, its agents, employees, contractors, successors, and assigns as set forth herein. Furthermore, the Parties' indemnification obligations pursuant to Section VI.a. of this Agreement shall survive the expiration, termination, or cancellation of this Agreement, the Underlying Agreements, and/or the business relationship of the Parties, and shall continue to bind the Parties, their agents, employees, contractors, successors, and assigns as set forth herein.

d. Amendment. The Parties agree that this Agreement will be amended automatically to conform to any changes in the HIPAA Privacy and Security Rules as are necessary for each of them to comply with the current requirements of the HIPAA Privacy and Security Rules and the Health Insurance Portability and Accountability Act, unless a particular statutory or regulatory provision requires that the terms of this Agreement be amended to reflect any such change. In those instances where an amendment to this Agreement is required by law, the Parties shall negotiate in good faith to amend the terms of this Agreement within sixty (60) days of the effective date of the law or final rule requiring the amendment. If, following such period of good faith negotiations, the Parties cannot agree upon an amendment to implement the requirements of said law or final rule, then either Party may terminate this Agreement and the Underlying Agreements upon ten (10) days written notice to the other Party. Except as provided above, this Agreement may be amended or modified only in a writing signed by the Parties.

e. Assignment. Neither Party may assign its respective rights and obligations under this Agreement without the prior written consent of the other Party.

f. Independent Contractor. None of the provisions of this Agreement are intended to create, nor will they be deemed to create, any relationship between the Parties other than that of independent parties contracting with each other solely for the purposes of effecting the provisions of this Agreement and any other agreements between the Parties evidencing their business relationship. Nothing in this Agreement creates or is intended to create an agency relationship.

g. Governing Law. To the extent this Agreement is not governed exclusively by the HIPAA Privacy and Security Rules or other provisions of federal statutory or regulatory law, it will be governed by

and construed in accordance with the laws of the state in which Covered Entity has its principal place of business.

h. No Waiver. No change, waiver, or discharge of any liability or obligation hereunder on any one or more occasions shall be deemed a waiver of performance of any continuing or other obligation, or shall prohibit enforcement of any obligation, on any other occasion.

i. Interpretation. Any ambiguity of this Agreement shall be resolved in favor of a meaning that permits Covered Entity and Business Associate to comply with the HIPAA Privacy and Security Rules.

j. Severability. In the event that any provision of this Agreement is held by a court of competent jurisdiction to be invalid or unenforceable, the remainder of the provisions of this Agreement will remain in full force and effect.

k. Notice. Any notification required in this Agreement shall be made in writing to the representative of the other Party who signed this Agreement or the person currently serving in that representative's position with the other Party.

l. Certain Provisions Not Effective in Certain Circumstances. The provisions of this Agreement relating to the HIPAA Security Rule shall not apply to Business Associate if Business Associate does not receive, create, maintain, or transmit any Electronic Protected Health Information from or on behalf of Covered Entity.

m. Entire Agreement. This Agreement constitutes the entire understanding of the Parties with respect to the subject matter hereof and supersedes all prior agreements, oral or written. In the event of any inconsistency between this Agreement and any other agreement between the Parties concerning the use and disclosure of Protected Health Information and the Parties' obligations with respect thereto, the terms of this Agreement shall control.

n. Ownership. Any Protected Health Information provided by Covered Entity to Business Associate, and any Protected Health Information created, received, maintained, transmitted, used, requested, disclosed, or accessed by Business Associate in Covered Entity's name or on Covered Entity's behalf, will be the sole property of Covered Entity at all times.

o. Counterparts. This Agreement may be executed in one or more counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same Agreement.

IN WITNESS WHEREOF, the Parties have executed this Agreement as of the day and year written above.

**Covered Entity:**

**Cone Health**

Signed by:  
By: Jason Nelms  
84401A88A6D84FC...

Name: Jason Nelms

Title: Vice President, Revenue Cycle

**Business Associate:**

Signed by:  
**The Servant Center**

By: Shanna T. Reece  
7788F9C5E07845A...

Name: Shanna T. Reece

Title: Executive Director



1. Recipient/Grantee Name and Address: Servant Center, Inc. 1417 Glenwood Avenue Greensboro, North Carolina 27403-3533		2. Award Date: 10/01/2024	3. Action: Continuation
5. Recipient Unique Entity ID Number (UEI): XPMNLCCD4G69		4. Project Period: From 10/01/2023 to 09/30/2026 Budget Period: From 10/01/2024 to 09/30/2025	
7. Unique Federal Award Identification Number (FAIN): SCIP197-4599-659-PD-24		6. Recipient IRS/Vendor Number: 661834197	
9. Amount of Federal Funds Obligated by this Action: See original grant agreement for this FAIN		10. Total Amount of Federal Funds Obligated: See original grant agreement for this FAIN	11. Total Amount of Federal Award: See original grant agreement for this FAIN
12. Budget Approved by the VA: Yes - 10/01/2024	13. Total Approved Cost Sharing/Matching: N/A	14. Supplement Number: 0	
15. Is this a Research & Development Award: N		16. Indirect Cost Rate: If applicable, up to 15% de minimis or as negotiated and previously approved. See 2 C.F.R. § 200.414.	
17. Project Title: VA Homeless Providers Grant and Per Diem Program			
18. Statutory Authority for Grant: 38 U.S.C. §§ 2011, 2012; P.L. 114-315 § 701.			
19. Method of Payment: Automated Clearing House			
20. Award Description: VA's Homeless Providers Grant and Per Diem (GPD) Program awards per diem funding to the organization identified above to support Veterans experiencing homelessness achieve residential stability by providing transitional supportive housing under the Bridge Housing model (6 beds), Clinical Treatment model (0 beds), Low Demand model (0 beds), Service Intensive model (0 beds) and Hospital to Housing model (15 beds), for a total of 21 beds for homeless Veterans or for Veterans at risk of becoming homeless as described in the grant application.			
21. VA Contact: Chelsea Watson, National Director, VA Grant and Per Diem Program Office, GPDgrants@va.gov			
<b>AGENCY APPROVAL</b>		<b>GRANTEE ACCEPTANCE</b>	
		By signing in Box 24, I certify that I reviewed all 3 pages and agree to comply with all the terms and conditions of this agreement.	
		23. Name and title of authorized grantee official <i>Shanna T. Reece, Executive Director</i>	
		24. Signature of authorized grantee official <i>Shanna T. Reece</i>	
22. Name, title, signature of VA awarding official			



FAIN Number:

Award Date: See page 1

In accepting a Department of Veterans Affairs (VA) award, the grantee (or recipient) assumes legal, financial, administrative and programmatic responsibility for administering the award. All applicable appropriations, laws, statutes, rules, regulations (e.g., 38 C.F.R. part 61, 2 C.F.R. part 200), Notice of Funding Opportunity (NOFO) requirements, Executive Orders governing assistance awards, statutory and national policy requirements (e.g., 2 C.F.R. § 200.300 and 41 U.S.C. § 4712) and these terms and conditions are hereby incorporated into this award by reference. While VA may provide grantees with reminder notices regarding award requirements, the absence of receiving such notice does not relieve grantees of responsibility to meet all applicable award requirements. Under this agreement, the grantee agrees to provide what is outlined in the grant award and application along with any modifications that have occurred or will occur as a result of official changes approved by the VA GPD Program Office.

By submitting a grant application with a signed SF-424 and by accepting this agreement, the recipient and its executives, as defined in 2 C.F.R. § 170.315, certify that the recipient's policies are in compliance with all applicable Federal laws, and relevant Executive guidance. The applicant's signature on the SF-424, including electronic signature, constitutes a binding offer by the applicant and constitutes agreement to the terms and conditions. Furthermore, by drawing or otherwise obtaining funds for the award from the grant payment system or other payment process, the recipient accepts the terms and conditions of the award and agrees to perform in accordance with the requirements of the award.

#### 1. Continuation Award Amendments

- a) In the original grant agreement, in the section titled "Terms related to non-Construction funding," item e) is updated to state:
  - i. If applicable, the grantee will ensure that no more than 25% of the awarded beds for adult participants are occupied at any one time by people not being served by the GPD grant. If applicable, this also applies to any portion of the GPD beds that received capital grant funding.
- b) In the original grant agreement, in the section titled "Period of Availability of Funds," item c) is updated to state:
  - i. Expenditures for staff costs that are obligated during the award budget period may be charged to the award up to 120 days after the award expiration date. Grant monies are available for administrative closeout activities, which are limited to activities such as the preparation of final reports. No other staff costs may be obligated and expended for closeout activities.
- c) In the original grant agreement, in the section titled "Publication for Professional Audiences," an additional paragraph is added to state:
  - i. The grantee will not use VA's name or any of its components, except in factual publicity and with the prior approval of VA, which approval shall not be unreasonably withheld. Such factual publicity shall not imply that the involvement of VA serves as an endorsement of the general policies, activities, or products of the grantee. Where the publicity references VA, publicity will be accompanied by a disclaimer to the effect that no VA endorsement is intended. Any publicity (meaning any efforts to communicate broadly to the public for any purpose) released by the grantee concerning this agreement or the program shall be subject to prior approval by VA. The grantee shall not publish any data regarding the program without the prior written consent of VA, regardless of whether such data has been publicly disclosed by any other person, unless otherwise required by law, provided that notice of such disclosure will be made to VA if permitted by law.
- d) In the original grant agreement, in the section titled "Seal/Logo," the paragraph is updated to state:
  - i. The grantee may not use VA's logo, seals, flags, and other symbols without a written determination by VA that the proposed use by the grantee advances the aims, purposes, and mission of VA. VA approval is not guaranteed but will not be unreasonably withheld.
- e) A new term is added (per 38 C.F.R. part 50 as amended on 03/04/2024). The new term is entitled: Equal Treatment for Faith-Based Organizations and Activities:



U.S. Department  
of Veterans Affairs

Veterans Grant Program  
Award Continuation Sheet  
Grant Agreement

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- i. Grantees must comply with the requirements of 38 C.F.R. § 61.64 and 38 C.F.R. part 50.
- ii. A faith-based organization that participates in this program retains its independence from the Government and may continue to carry out its mission consistent with religious freedom and conscience protections in Federal law.
- iii. A faith-based organization may not use direct Federal financial assistance from VA to support or engage in any explicitly religious activities except when consistent with the Establishment Clause and any other applicable requirements.
- iv. An organization receiving Federal financial assistance may not, in providing services funded by VA, or in their outreach activities related to such services, discriminate against a program beneficiary or prospective program beneficiary on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

**Application for Federal Assistance SF-424**

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		<b>* If Revision, select appropriate letter(s):</b> _____ <b>* Other (Specify):</b> _____	
<b>* 3. Date Received:</b> _____		<b>4. Applicant Identifier:</b> _____			
<b>5a. Federal Entity Identifier:</b> _____			<b>5b. Federal Award Identifier:</b> _____		
<b>State Use Only:</b>					
<b>6. Date Received by State:</b> _____		<b>7. State Application Identifier:</b> _____			
<b>8. APPLICANT INFORMATION:</b>					
<b>* a. Legal Name:</b> <input type="text" value="The Servant Center, Inc."/>					
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <input type="text" value="56-1834197"/>			<b>* c. UEI:</b> <input type="text" value="XPMNLCCD4G69"/>		
<b>d. Address:</b>					
<b>* Street1:</b> <input type="text" value="1417 Glenwood Avenue"/>					
<b>Street2:</b> _____					
<b>* City:</b> <input type="text" value="Greensboro"/>					
<b>County/Parish:</b> _____					
<b>* State:</b> <input type="text" value="NC: North Carolina"/>					
<b>Province:</b> _____					
<b>* Country:</b> <input type="text" value="USA: UNITED STATES"/>					
<b>* Zip / Postal Code:</b> <input type="text" value="274033533"/>					
<b>e. Organizational Unit:</b>					
<b>Department Name:</b> _____			<b>Division Name:</b> _____		
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>					
<b>Prefix:</b> _____		<b>* First Name:</b> <input type="text" value="Shanna"/>			
<b>Middle Name:</b> _____					
<b>* Last Name:</b> <input type="text" value="Reece"/>					
<b>Suffix:</b> _____					
<b>Title:</b> _____					
<b>Organizational Affiliation:</b> _____					
<b>* Telephone Number:</b> <input type="text" value="336-275-8585 x 504"/>		<b>Fax Number:</b> _____			
<b>* Email:</b> <input type="text" value="sreece@theservantcenter.org"/>					

Application for Federal Assistance SF-424

\* 9. Type of Applicant 1: Select Applicant Type:

M: Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

\* 10. Name of Federal Agency:

Department of Veterans Affairs

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

\* 12. Funding Opportunity Number:

VA-GPD-PDO-FY2024

\* Title:

GPD Per Diem Only Grant

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

\* 15. Descriptive Title of Applicant's Project:

Servant House: 21 bed GPD program with 16 Hospital to Housing beds and 5 Bridge beds.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts If needed.

17. Proposed Project:

\* a. Start Date:

\* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="362,176.00"/>
* b. Applicant	<input type="text" value="69,539.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="7,750.00"/>
* f. Program Income	<input type="text" value="3,000.00"/>
* g. TOTAL	<input type="text" value="442,465.00"/>



\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

- Yes
- No

If "Yes", provide explanation and attach

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:  \* First Name:   
 Middle Name:   
 \* Last Name:   
 Suffix:

\* Title:

\* Telephone Number:  Fax Number:


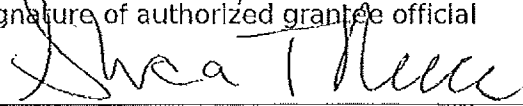
\* Email:

\* Signature of Authorized Representative:

\* Date Signed:





1. Recipient/Grantee Name and Address: Servant Center, Inc. 1417 Glenwood Avenue Greensboro, North Carolina 27403-3533		2. Award Date: 09/30/2023	3. Action: New
5. Recipient Unique Entity ID Number (UEI): XPMNLCCD4G69		4. Project Period: From 10/01/2023 to 09/30/2025 Budget Period: From 10/01/2023 to 09/30/2025	
7. Unique Federal Award Identification Number (FAIN): SCIP197-6009-659-CM-24		6. Recipient IRS/Vendor Number: 561834197	
9. Amount of Federal Funds Obligated by this Action: \$169,495		10. Total Amount of Federal Funds Obligated: \$0	11. Total Amount of Federal Award: \$169,495.00
12. Budget Approved by the VA: Yes - 09/30/2023		13. Total Approved Cost Sharing/Matching: N/A	14. Supplement Number: 0
15. Is this a Research & Development Award: N		16. Indirect Cost Rate: If applicable, 10% de minimis or as negotiated and previously approved. See 2 C.F.R. § 200.414.	
17. Project Title: VA Homeless Providers Grant and Per Diem Program			
18. Statutory Authority for Grant: 38 U.S.C. §§ 2013; P.L. 114-315 §§ 701, 712.			
19. Method of Payment: Automated Clearing House			
20. Award Description: VA's Homeless Providers Grant and Per Diem (GPD) Program awards funding to the organization identified above to provide a total of 40.00 case management hours per week to improve the retention of housing by Veterans who are at risk of becoming homeless or who were previously homeless and are transitioning to permanent housing as described in the grant application.			
21. VA Contact: Chelsea Watson, National Director, VA Grant and Per Diem Program Office, GPDgrants@va.gov			
<b>AGENCY APPROVAL</b>		<b>GRANTEE ACCEPTANCE</b>	
22. Name, title, signature of VA awarding official   Chelsea Watson, MSPH National Director, Grant & Per Diem Program		By signing in Box 24, I certify that I reviewed all 13 pages and agree to comply with all the terms and conditions of this agreement.	
		23. Name and title of authorized grantee official Shanna T. Reece, Executive Director	
		24. Signature of authorized grantee official 	



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In accepting a Department of Veterans Affairs (VA) award, the grantee (or recipient) assumes legal, financial, administrative and programmatic responsibility for administering the award. All applicable appropriations, laws, statutes, rules, regulations (e.g., 38 C.F.R. part 61, 2 C.F.R. part 200), Notice of Funding Opportunity (NOFO) requirements, Executive Orders governing assistance awards, statutory and national policy requirements (e.g., 2 C.F.R. § 200.300 and 41 U.S.C. § 4712) and these terms and conditions are hereby incorporated into this award by reference. While VA may provide grantees with reminder notices regarding award requirements, the absence of receiving such notice does not relieve grantees of responsibility to meet all applicable award requirements. Under this agreement, the grantee agrees to provide what is outlined in the grant award and application along with any modifications that have occurred or will occur as a result of official changes approved by the VA GPD Program Office.

By submitting a grant application with a signed SF-424 and by accepting this agreement, the recipient and its executives, as defined in 2 C.F.R. § 170.315, certify that the recipient's policies are in compliance with all applicable Federal laws, and relevant Executive guidance. The applicant's signature on the SF-424, including electronic signature, constitutes a binding offer by the applicant and constitutes agreement to the terms and conditions. Furthermore, by drawing or otherwise obtaining funds for the award from the grant payment system or other payment process, the recipient accepts the terms and conditions of the award and agrees to perform in accordance with the requirements of the award.

#### **1. Terms related to non-Construction funding**

- a) The grantee agrees to comply with government-wide certifications required of Federal grant recipients as evidenced by maintaining an active registration in the System for Award Management (SAM). The grantee agrees to comply with applicable requirements regarding SAM and applicable restrictions on subawards to first-tier subrecipients that do not acquire and provide a UEI. The grantee will work with VA to ensure that all subrecipients have a current account on SAM. The details of grantee obligations are posted on the SAM website at [www.SAM.gov](http://www.SAM.gov). Help resources are available at [www.FSD.gov](http://www.FSD.gov). SAM and Universal Identifier Requirements are hereby incorporated by reference into this grant agreement. For details, see 2 C.F.R. part 25 Appendix A).
- b) The grantee certifies that the application, and information submitted as a part of the application, are in accordance with the applicable requirements in 38 C.F.R. part 61 and 2 C.F.R. part 200.
- c) The grantee will create and operate the grant in accordance with the application it has submitted and will comply with the definitions and performance metrics, or other program monitoring requirements, as outlined in the NOFO published on February 3, 2023, and referenced here and elsewhere in this grant agreement.
  - i. The grantee must comply with eligibility requirements described in the NOFO, including requirements for eligible participants, eligible services and/or eligible activities. Grantees must avoid duplication of activities.
  - ii. The grantee must implement a low barrier approach to providing services to Veterans, which generally means service occurs on the same day from the point of identification or referral to the GPD project, or within no more than 72 hours, as described in the NOFO.
  - iii. The grant must engage in the local coordinated entry process and the by name list as appropriate.
  - iv. A grantee who does not meet performance measures, does not maintain occupancy or caseloads, exceeds expected lengths of Veteran-service or who otherwise performs or appears to perform less than satisfactorily (e.g., as a result of a risk assessment or due to information regarding the organization's financial stability or management standards) may



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be subject to additional conditions of award or remedies for noncompliance (2 C.F.R. §§ 200.208, 200.339). Additional conditions or remedies for noncompliance may include but are not limited to increased reporting or monitoring, reductions to allowed costs or activities, withholding, suspension or termination.

- v. All grantees must participate in HMIS and in their local coordinated entry system.
- vi. All projects must be able to start serving Veterans as of October 1, 2023. Failure to initiate services to Veterans and to meet the minimum caseload requirements no later than 180 days after the start of the award start date may indicate a failure to comply with the terms and conditions of award. VA may impose specific conditions or remedies for noncompliance, including termination of the grant, at any point during the grant period (2 C.F.R. § 200.208, 200.339). Terminations and other performance matters may impact future award decisions (§ 200.206).
- d) If applicable, the grantee will furnish to Veterans the level of care for which such application is made and in conformance with the standards of care prescribed by VA, annual VA inspections (38 C.F.R. § 61.65) and all applicable Federal, State and local laws, codes, regulations and ordinances (38 C.F.R. § 61.80).
- e) If applicable, the grantee will ensure that not more than 25% of the grant awarded beds are occupied at any one time by non-Veterans. If applicable, this also applies to any portion of the GPD beds that received capital grant funding.
- f) Grantees will ensure staff supported by grant funds are trained annually regarding suicide prevention and how to address situations in which Veterans demonstrate suicidal ideation. Standard operating procedures are to be developed on suicide prevention in consultation with your local VA medical facility. VA training is available at: [https://www.va.gov/EMPLOYEEEDUCATION/ees\\_vha\\_train.asp](https://www.va.gov/EMPLOYEEEDUCATION/ees_vha_train.asp). Suicide Prevention Coordinator locator (for in-person training) is available at: <https://www.veteranscrisisline.net/get-help/local-resources>.
- g) Grantees will ensure staff supported by grant funds who provide services to Veterans are trained annually regarding equity and inclusion. Standard operating procedures are to be developed on nondiscrimination of any individuals based on factors including but not limited to race, color, religion, sex, gender identity, gender expression, sex characteristics, sexual orientation, pregnancy, national origin, disability, age, genetic information, marital status, parental status or political affiliation. VA training is available at: [https://www.va.gov/EMPLOYEEEDUCATION/ees\\_vha\\_train.asp](https://www.va.gov/EMPLOYEEEDUCATION/ees_vha_train.asp).
- h) The grantee agrees that it is responsible for the use of grant funds provided by VA. In accordance with 2 C.F.R. §§ 200.339-340, VA may terminate this award or take other action if the grantee fails to comply with any one of the terms and conditions of this award, whether stated in a Federal statute, regulation or assurance application; or no longer effectuates the program goals or VA priorities.
- i) Consistent with § 200.206, VA will monitor grantees for a satisfactory record of executing programs or activities under any VA or non-VA Federal grant, cooperative agreement or procurement award. VA will monitor grantees for integrity and business ethics. VA may make or continue a grant if it is determined that any non-satisfactory information identified is not relevant to the current VA award under consideration or if there are specific conditions that can appropriately mitigate the effects of the non-Federal entity's risk in accordance with § 200.208. VA may impose specific conditions of award (§ 200.208) and/or remedies for noncompliance (§ 200.339), including termination of the grant to a recipient who does not fully meet these standards. In general, there is no single



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triggering event that mandates that VA take a particular enforcement action. Usually, enforcement actions (singly or in combination) will escalate in severity based on the demonstrated unwillingness or inability of the grantee to take corrective action. However, there may be instances in which termination is the most appropriate first course of action and is necessary to protect the interests of the Government and the public.

- j) The grantee agrees to comply with the organizational audit requirements of 2 C.F.R. part 200, Subpart F, Audit Requirements and further understands and agrees that funds may be withheld, or other related requirements may be imposed, if outstanding audit issues (if any) from Subpart F (and any other audits of VA grant funds) are not satisfactorily and promptly addressed.
- k) Grant funds may be used only for the purposes in the grantee's approved application and allocated as directed in 2 C.F.R. part 200, Subpart E. The grantee shall not undertake any work or activities that are not described in the grant application, or that use staff, equipment or other goods or services paid for with VA grant funds, without prior written approval from VA.
- l) The grantee agrees to comply with applicable requirements of the Federal Funding Accountability and Transparency Act of 2006 (FFATA), including requirements on executive compensation and implementing requirements found at 2 C.F.R. parts 25 and 170. For example, grantees must report first-tier subawards of \$30,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the grantee and first-tier subrecipients of award funds for the preceding fiscal year. Bonuses to any individuals utilizing Federal funds must also conform to the reporting requirements and be approved in advance by the agency in writing. The details of grantee obligations, which derive from the FFATA, are posted on the FFATA Subaward Reporting System (FSRS) website at <https://www.fsrs.gov/>.
- m) Reporting of Matters Related to Recipient Integrity and Performance: If the total value of your currently active grants, cooperative agreements and procurement contracts from all Federal awarding agencies exceeds \$10,000,000 for any period of time during the period of performance of this Federal award, then you as the recipient during that period of time must maintain the currency of information reported to SAM that is made available in the designated integrity and performance system (currently the Federal Awardee Performance and Integrity Information System (FAPIIS)) about civil, criminal or administrative proceedings. This is a statutory requirement under P.L. 110-417 § 872, as amended (41 U.S.C. § 2313). See Appendix XII of 2 C.F.R. part 200 for full details.
- n) The grantee must take reasonable measures to safeguard protected personally identifiable information (PII) and other information designated as sensitive consistent with applicable Federal, State, local and tribal laws regarding privacy and obligations of confidentiality. Grantees must not include PII in communications with VA unless it is necessary to do so and unless measures are taken to encrypt or to otherwise protect the communication. No PII regarding program participants may be submitted to the GPD Program Office through the program's electronic grants management system. For definitions and requirements, see 2 C.F.R. part 200 (e.g., § 200.1 Definitions, § 200.303 Internal controls).
- o) The grantee certifies that it will use VA grant funds for projects that meet domestic content procurement preferences specified in the Build America, Buy America Act, P.L. 117-58 § 70914. Domestic content procurement preference means all iron, steel, manufactured products and construction materials used in the project are produced in the United States. Manufactured products must be manufactured in the United States and the cost of the components of the manufactured product that are mined, produced or manufactured in the United States must be greater than 55 percent of the total cost of all components of the manufactured product. For



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construction materials, all manufacturing processes for the construction materials must occur in the United States. GPD transitional housing grants are not infrastructure projects. Therefore, generally, infrastructure costs are not allowed, including but not limited to costs for acquisition, renovation, construction or other changes to buildings or real property. However, consistent with Federal-wide initiatives (e.g., Executive Order 14005, OMB memos M-21-26 & M-22-11 and P.L. 117-58), if written prior approval is received from the GPD Program Office for Infrastructure costs, then GPD grantees must ensure domestic preference for those infrastructure activities (consistent with P.L. 117-58 and 2 C.F.R. § 200.322). Information about Made In America policies is available at <https://www.madeinamerica.gov/>.

## 2. Standard Requirements

- a) Standards for financial management require that a recipient's financial system control and account for Federal funds and cost sharing under the award and produce financial reports.
  - i. States must expend and account for funds under the award in accordance with State laws and procedures that apply to the expenditure of and the accounting for the State's own funds.
  - ii. In addition, the State's and other non-Federal entity's financial management systems, including records documenting compliance with Federal statutes, regulations and the terms and conditions of the Federal award, must be sufficient to permit:
    - Preparation of the reports required under the award; and
    - Tracing of funds to a level of expenditures adequate to establish that award funds are used according to the Federal statutes, regulations and terms of the award for the purposes for which the grant was made.
  - iii. States must comply with the cash management standards in 31 C.F.R. part 205, the Department of the Treasury's implementation of the Cash Management Improvement Act of 1990 (31 U.S.C. § 6503, as amended by P.L. 101-453 § 5).
  - iv. VA must make prompt payments to recipients for allowable reimbursable costs. The recipient must promptly refund any balances of unobligated cash that VA has paid and that is not authorized to be retained by the recipient. OMB Circular A-129 and 2 C.F.R. part 200 (e.g., §§ 200.305, 200.346) govern unreturned amounts that become delinquent debts.
- b) The financial management system must enable recipients to meet the following requirements: 2 C.F.R. §§ 200.300-346; 400-476; and 500-512.
  - i. Financial Reporting. For financial reports required by the award, recipients must provide accurate, current and complete financial information about the Federally assisted activities. If subawards are executed under the award, recipients must have reasonable procedures for ensuring the receipt of financial reports from each subrecipient in sufficient time to allow the recipient to prepare reports.
  - ii. Accounting Records. Recipients must maintain records that adequately identify the sources of funds for Federally assisted activities and the purposes for which funds are to be used. The records must contain information about the award and any subaward, including authorizations, obligations, un-obligated balances, assets, liabilities, outlays or expenditures and any program income. The accounting records must be supported by source documentation, such as cancelled checks, paid bills, payrolls and time and attendance records.



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- iii. Program Income: Program income must be deducted from total allowable costs to determine the net allowable costs. Program income must be used to reduce the Federal costs rather than to increase the funds available to the project. See 2 C.F.R. § 200.307.
- iv. Internal Control. Recipients must maintain effective control over and accountability for all cash, real and personal property and other assets under the award. Recipients must adequately safeguard all of these assets and ensure that they are used only for authorized purposes.
- v. Budget Control. Recipients must be able to compare actual expenditures or outlays with the approved budget.
- vi. Allowable Costs. Recipients must have established procedures for determining reasonableness, allocability and allowability of costs in accordance with the applicable Federal cost principles, program regulations, program NOFO and other Federal requirements, including 2 C.F.R. part 200 Subpart E. As stated in the funding opportunity, indirect costs, as defined in § 200.412-415, are allowable if supported by a Federally Negotiated Indirect Cost Rate Agreement or if supported by a certification of de minimis indirect cost rate declaring a rate of up to 10% of modified total direct costs as described in § 200.414. Otherwise, all requested costs must be direct costs.
- vii. Cash Management. Consistent with 2 C.F.R. § 200.305, recipients must have procedures for minimizing the time elapsing between the transfer of any advance payments of funds under the award and disbursement of the funds for direct program costs and the proportionate share of any allowable indirect or facilities and administrative costs. Recipients must ensure that the timing and amount of any payments to subrecipients under the award conform to this standard.
- viii. Requirement for Performance Data. In comparing actual expenditures or outlays with budget amounts, as required, recipients must relate financial information to performance data. For this purpose, VA will accept estimates based on available documentation.
- ix. Review of Financial Management System. VA may review the recipient's financial management system at any time to determine whether it complies with the requirements of this provision.
- x. Conflict of Interest. In accordance with 2 C.F.R. § 200.112 and consistent with § 200.318(c), grantees must disclose to VA in writing any potential conflict of interest that may affect VA grant awards. As required in the NOFO, such conflicts of interest must be disclosed to GPD immediately and again annually thereafter. Grantees must establish safeguards to prohibit personnel from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain (per SF-424B assurances with which your organization certified compliance via [www.SAM.gov](http://www.SAM.gov)).

### 3. Period of Availability of Funds

- a) The project and budget periods for this award are indicated in box 4 on page 1 of this grant agreement. The recipient may charge to the award only allowable costs resulting from obligations incurred during the budget period.
- b) VA does not allow pre-award costs to be charged to the grant unless otherwise stated in the NOFO. If pre-award costs are allowed by the NOFO and if they are requested in the application, then this grant agreement constitutes VA's written approval of the requested pre-award costs. All requirements related to pre-award costs apply (e.g., 2 C.F.R. § 200.458).



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- c) Expenditures for staff costs that are obligated during the award budget period may be charged to the award up to 120 days after the award expiration date. Grant monies are available for closeout activities, which is limited to the preparation of final reports. No other staff costs may be obligated and expended for closeout activities.

#### **4. Publication for Professional Audiences**

Any publications or articles resulting from the award must acknowledge the support of the VA and will include a disclaimer of official endorsement as follows: "This [article] was funded [In part] by a grant from the United States Department of Veterans Affairs. The opinions, findings and conclusions stated herein are those of the author[s] and do not necessarily reflect those of the United States Department of Veterans Affairs." The recipient must ensure that this disclaimer is included on all brochures, flyers, posters, billboards or other graphic artwork produced under the terms of the award.

#### **5. Seal/Logo**

The VA seal may not be used by recipients without the express written permission of VA.

#### **6. Post-award Requirements for Closeout**

- a) The Program Office will provide recipients with information regarding final report due dates and where to send the final reports. VA will notify the recipient in writing of any changes to the reporting requirements before the project period end date. Copies of any required forms and instructions for their completion are included with the award and are provided to each recipient by VA.
- b) Recipients must submit, within 120 calendar days after the project period end date of the award, all final financial, performance and other reports as required by the terms and conditions of the award. VA may approve written requests for extensions by the recipient. Requirements include:
- i. Unless VA authorizes an extension, a recipient must liquidate all obligations incurred under the award not later than 120 calendar days after the project period end date.
  - ii. VA must make prompt payments to recipients for allowable reimbursable costs under the award being closed out. The recipient must promptly refund any balances of un-obligated cash that VA has advanced or paid and that is not authorized to be retained by the recipient. See OMB Circular A-129 and 2 C.F.R. § 200.346, Collection of Amounts Due, for requirements regarding unreturned amounts that become delinquent debts.
  - iii. When authorized by the award, VA must make a settlement for any upward or downward adjustments to the Federal share of costs after closeout reports are received, not to exceed the amount of the award. Unless otherwise prohibited by statute or regulation.
  - iv. The recipient must account for any real and personal property acquired with Federal funds or received from the Federal Government in accordance with applicable rules, regulations and laws.
  - v. In the event a final audit has not been performed before the closeout of the award, VA will retain the right to recover an appropriate amount after fully considering the recommendations on disallowed costs resulting from the final audit.
  - vi. The recipient agrees that it will submit annual financial status reports to VA using the SF-425 Federal Financial Report form, not later than 120 days after the end of each grant year. The final report shall be submitted not later than 120 days following the end of the award period. Failure to provide this report in accordance with 2 C.F.R. § 200.344 and with the terms and



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conditions of the Federal Award, will result in VA proceeding to closeout with the information available within one year of the period of performance end date and will result in VA reporting the grantee's material failure to comply with the terms and conditions of the award to the OMB-designated integrity and performance system (currently FAPIIS).

#### **7. Retention and Access Requirements for Records**

- a) The recipient must maintain financial records, supporting documents, statistical records and all other records pertinent to an award for a period of three years from the date of submission of the final expenditure report. For awards that are renewed quarterly or annually, these same records must be maintained from the date of the submission of the quarterly or annual financial report as authorized by VA.
- b) The only exceptions are the following:
  - i. If any litigation, claim or audit is started before the expiration of the three-year period, the records must be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.
  - ii. Records for real property and equipment acquired with Federal funds must be retained for three years after final disposition.
  - iii. When records are transferred to or maintained by VA the three-year retention requirement is not applicable to the recipient.

#### **8. Timely and Unrestricted Access and Protection from Retaliation**

- a) VA, the Inspector General, Comptroller General or any of their duly authorized representatives have the right of timely and unrestricted access to any books, documents, papers or other records of recipients and subrecipients that are pertinent to the award, in order to make audits, examinations, excerpts, transcripts and copies of such documents. This right also includes timely and reasonable access to a recipient's and subrecipient's personnel for the purpose of interview and discussion related to such documents. The rights of access are not limited to the required retention period but must last as long as records are retained.
- b) Employees of grantees are protected from retaliation for making a protected disclosure related to certain types of wrongdoing. 41 U.S.C. § 4712. Among other entities, the VA Office of the Inspector General (OIG) is authorized to receive such disclosures. The OIG maintains a toll-free number (1-800-488-8244) for receiving disclosures, including those concerning gross mismanagement of a Federal contract or grant, fraud, waste of federal funds, abuse of authority under grants and cooperative agreements, substantial and specific danger to public health and safety or violations of any law, rule or regulation related to a Federal contract or grant. Information also may be submitted by web form on the OIG Hotline website at <https://www.va.gov/oig/hotline> or by mail to VA Inspector General Hotline (53H), 810 Vermont Ave., NW, Washington, DC 20420. Such reports are treated as sensitive material and submitters may decline to give their names if they choose to remain anonymous.

#### **9. Federal Debt Status**

The recipient may not be delinquent in the repayment of any Federal debt. Examples of relevant debt include delinquent payroll or other taxes, audit disallowances and benefits that were overpaid (OMB Circular A-129). The recipient must notify VA immediately if the recipient becomes delinquent during the





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project period. VA cannot release award funds until the recipient provides documentation showing a repayment plan has been accepted by the Internal Revenue Service and payments have been made.

### 10. Nondiscrimination Policies

Federal laws prohibit discrimination in housing programs and activities. These obligations extend to recipients of Federal financial assistance, including subrecipients. Grantees must stay informed and compliant with applicable laws. For example, the recipient must execute the project (e.g., productions, workshops, programs) in accordance with the following laws, as applicable. Grantees who are unsure how a specific law applies to their particular facility should seek advice from their legal counsel.

- a) **Title VI of the Civil Rights Act of 1964**, as amended, provides that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied benefits of or be subject to discrimination under any program or activity receiving Federal financial assistance. Title VI also extends protection to persons with limited English proficiency (42 U.S.C. § 2000d et seq.).
- b) **Title IX of the Education Amendments of 1972** provides that no person in the United States shall, on the basis of sex or blindness, be excluded from participation in, be denied benefits of or be subject to discrimination under any education program or activity receiving Federal financial assistance (20 U.S.C. § 1681 and 1684 et seq.).
- c) **Section 504 of the Rehabilitation Act of 1973**, as amended, provides that no otherwise qualified individual with a disability in the United States, shall, solely by reason of his/her disability, be excluded from participation in, be denied benefits of or be subject to discrimination under any program or activity receiving Federal financial assistance (29 U.S.C. § 794).
- d) **The Age Discrimination Act of 1975** provides that no person in the United States shall, on the basis of age, be excluded from participation in, be denied benefits of or be subject to discrimination under any program or activity receiving Federal financial assistance (42 U.S.C. § 6101 et seq.).
- e) **The Americans with Disabilities Act of 1990 (ADA)**, as amended, prohibits discrimination on the basis of disability in employment (Title I), State and local government services (Title II), places of public accommodation and commercial facilities (Title III) (42 U.S.C. § 12101-12213).
- f) **The Fair Housing Act of 1968 (FHA)**, as amended, as codified in 42 U.S.C. § 3601, protects persons "seeking housing assistance, or engaging in other housing-related activities." The GPD Program is a transitional housing program for Veterans experiencing homelessness. The Department of Housing and Urban Development (HUD), the agency charged with overseeing the FHA, has explicitly declared that sex includes gender identity and sexual orientation (HUD Memorandum). Grantees must ensure that they are informed of and comply with all State, local and Federal housing laws, as many States and cities have added explicit protections against discrimination based on sexual orientation and gender identity.

### 11. Environmental and Preservation Policies

- a) The National Environmental Policy Act of 1969 (NEPA), as amended, applies to any Federal funds that would support an activity that may have environmental implications. VA has concluded that activities undertaken pursuant to the GPD non-capital grant program are categorically excluded from further NEPA analysis. If in the future, the GPD Program is amended or revised in such a way



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to permit activities that may impact the environment, or if the grant is a GPD capital grant, VA may ask you to respond to specific questions or provide additional information in accordance with NEPA. If there are environmental implications, we will determine whether a categorical exclusion may apply, to undertake an environmental assessment or to issue a "finding of no significant impact," pursuant to applicable regulations and 42 U.S.C. § 4321 et seq.

- b) The National Historic Preservation Act of 1966, as amended, applies to any Federal funds that would support either the planning or major renovation of any structure eligible for or on the National Register of Historic Places, in accordance with 54 U.S.C. § 306108. This law also applies to project activities, such as new construction and renovation, that would affect such properties. VA has concluded that activities undertaken pursuant to the GPD non-capital grant program would not impact historic properties. If in the future, the GPD Program is amended or revised to permit activities such as renovation or construction of structures, or if the grant is a GPD capital grant, VA will consult with your State Historic Preservation Officer and other consulting parties, as appropriate, to address potential impacts to historic properties. Any design, renovation or construction plans must be submitted to GPD for review and approval prior to undertaking any such activities. You may be asked to provide additional information on your project to ensure compliance with the NHPA (54 U.S.C. § 300101-307108).

## 12. Debarment and Suspension

- a) You must comply with requirements regarding debarment and suspension in 2 C.F.R. part 180, Subpart C.
- b) There are circumstances under which we may receive information concerning your fitness to carry out a project and administer Federal funds, for instance:
- i. Conviction of, or a civil judgment for, the commission of fraud, embezzlement, theft, forgery, making false statements;
  - ii. Any other offense indicating a lack of business integrity or business honesty that seriously and directly affects your present responsibility; and/or
  - iii. Any other cause of so serious or compelling a nature that it affects an organization's present responsibility.
- c) In these circumstances, we may need to act quickly to protect the interest of the government by suspending your funding while we undertake an investigation of the specific facts. We may coordinate our suspension actions with other Federal agencies that have an interest in our findings. A suspension may result in debarment from receiving Federal funding for up to three years.

## 13. The Drug Free Workplace Act

- a) The Drug Free Workplace Act requires you to publish a statement about your drug-free workplace program. You must give a copy of this statement to each employee (including consultants and temporary personnel) who will be involved in award-supported activities at any site where these activities will be carried out.
- b) You must maintain on file the place(s) where work is being performed under this award (i.e., street address, city, State and zip code). You must notify VA's Program Office of any employee convicted of a violation of a criminal drug statute that occurs in the workplace (41 U.S.C. § 8101 et seq. and 38 C.F.R. part 48).



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#### 14. Lobbying

- a) You may not conduct lobbying, as defined in the statutes and regulations listed below, within your Federally supported project. In addition, you may not use Federal funds for lobbying specifically to obtain awards. For definitions and other information on these restrictions, refer to the following:
- b) No part of the money appropriated by any enactment of Congress shall, in the absence of express authorization by Congress, be used directly or indirectly to pay for any personal service, advertisement, telegram, telephone, letter, printed or written matter or other device, intended or designed to influence in any manner a Member of Congress, a jurisdiction or an official of any government, to favor, adopt or oppose, by vote or otherwise, any legislation, law, ratification, policy or appropriation, whether before or after the introduction of any bill, measure or resolution proposing such legislation, law, ratification, policy or appropriation; but this shall not prevent officers or employees of the United States or of its departments or agencies from communicating to any such Member or official, at his request, or to Congress or such official, through the proper official channels, requests for any legislation, law, ratification, policy or appropriations which they deem necessary for the efficient conduct of the public business, or from making any communication whose prohibition by this section might, in the opinion of the Attorney General, violate the Constitution or interfere with the conduct of foreign policy, counter-intelligence, intelligence or national security activities (18 U.S.C. § 1913. Lobbying with appropriated moneys).
- c) 2 C.F.R. § 200.450 - "Lobbying." This regulation clarifies that lobbying is an unallowable project cost. Costs incurred in attempting to improperly influence either directly or indirectly, an employee or officer of the executive branch of the Federal Government to give consideration or to act regarding a Federal award or a regulatory matter are unallowable. Improper influence means any influence that induces or tends to induce a Federal employee or officer to give consideration or to act regarding a Federal award or regulatory matter on any basis other than the merits of the matter. See 2 CFR 200.450 for additional restrictions.
- d) P.L. 101-121 § 319, codified at 31 U.S.C. § 1352, prohibits the use of Federal funds in lobbying members and employees of Congress, as well as employees of Federal agencies, with respect to the award or amendment of any Federal grant, cooperative agreement, contract or loan. While non-Federal funds may be used for such activities, they may not be included in your project budget, and their use must be disclosed to the awarding Federal agency. Disclosure of lobbying activities by long-term employees (employed or expected to be employed for more than 130 days) is, however, not required. In addition, the law exempts from definition of lobbying certain professional and technical services by applicants and awardees.
- e) We strongly advise you to review these regulations carefully published at 38 C.F.R. part 45 and found at [www.ecfr.gov](http://www.ecfr.gov).
- f) Except for Federally required restrictions on lobbying, the grantee may not place any restrictions on subrecipients that limit the right or ability of the subrecipients or their agents to contract or otherwise conduct business with the Federal government.

#### 15. Site Visits

The grantor, through authorized representatives, has the right, at all reasonable times, to make site visits to review project accomplishments and to provide such technical assistance as may be required. If any site



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visit is made by the grantor on the premises of the recipient, a subrecipient or a contractor, the recipient shall provide, and shall require its subrecipients and contractors to provide, all reasonable facilities and assistance for the safety and convenience of the government representatives in the performance of their duties. All site visits and evaluations shall be performed in such a manner that will not unduly interfere with or delay the work.

#### **16. Trafficking in Persons**

- a) This government-wide award term implements Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. § 7104), located at 2 C.F.R. part 175.
- b) In accordance with the statutory requirement, in each agency award under which funding is provided to a private entity, section 106(g) of the TVPA, as amended, requires the agency to include a condition that authorizes the agency to unilaterally terminate the award, without penalty, if the recipient or a subrecipient:
  - i. Engages in severe forms of trafficking in persons during the period of time that the award is in effect;
  - ii. Procures a commercial sex act during the period of time that the award is in effect; or
  - iii. Uses forced labor in the performance of the award or subawards under the award.
  - iv. Full text of the award term is provided at 2 C.F.R. § 175.15.

#### **17. Prompt Payment Act**

Federal funds may not be used by the recipient for the payment of interest penalties to contractors when bills are paid late nor may interest penalties be used to satisfy cost sharing requirements. Obligations to pay such interest penalties will not be obligations of the United States.

#### **18. Veteran Definition**

The recipient acknowledges section 701 of the Jeff Miller and Richard Blumenthal Veterans Health Care and Benefits Improvement Act of 2016 (P.L. 114-315) amended 38 U.S.C. § 2002 and adding 38 U.S.C. § 2002(b) to define the term "Veteran" for purposes of §§ 2011, 2012, 2013, 2044 and 2061, as a person who served in the active military, naval air or space service, regardless of length of service, and who was discharged or released therefrom. Under section 2002(b), the term "Veteran" excludes a person who "(A) received a dishonorable discharge from the Armed Forces; or (B) was discharged or dismissed from the Armed Forces by reason of the sentence of a general court-martial." In addition, the length of service restrictions under 38 U.S.C. § 5303A do not apply, per 38 U.S.C. § 5303A(b)(3)(F).

#### **19. Payments**

- a) Per 2 C.F.R. § 200.305(b)(3) and 38 C.F.R. part 61, reimbursement for services rendered will be the method of payment. Grantees must disclose any other sources of income that may defray the cost of grant activities. Payments will be paid in accordance with 2 C.F.R. part 200 and 38 C.F.R. part 61.
- b) Grantees will submit requests for payment via one of two methods. The first is through the U.S. Department of Veterans Affairs Vendor Inquiry System (VIS) and the second is through the U.S. Department of Health and Human Services (HHS) Payment Management System. GPD will notify grantees of which of the two methods of payment to use and how to enroll.
- c) Grantees are required to submit properly prepared and fully documented payment requests within 30 days of the end of each month. Grantees who are unsure if their submission is properly prepared



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and fully documented should submit early to allow time for review and resubmission no later than 30 days after the end of each month. If circumstances dictate, grantees may also, upon approval by the GPD Program Office, submit requests as frequently as required to meet needs to disburse funds for program purposes.

- d) If applicable, unobligated balances must be returned or written prior approval must be received from the GPD Program Office to carry forward an unobligated balance to a future funding period. At VA's discretion, unobligated balances or carryover amounts may be used to offset future funding as appropriate, in accordance with 2 C.F.R. § 200.308(e)(3).

## **20. Performance Metrics and/or Monitoring Requirements**

- a) The grantee will have a liaison appointed from a nearby VA medical facility to provide oversight and monitor services provided to Veterans in the program. VA will complete regular monitoring evaluations of each grantee to include, at a minimum, a quarterly review of the grantee's performance, helping Veterans attain or maintain housing stability, adequate income support and self-sufficiency as identified in each application. Monitoring may also include a financial review of the agency's income and expenses as they relate to this project to ensure payment is accurate and to ensure compliance with program requirements. The grantee will be expected to demonstrate adherence to the grantee's proposed program concept, as described in the grantee's application. All grantees are subject to audits conducted by VA or its representative.
- b) The grantee will be assessed based on their ability to meet critical performance measures and required minimum performance metrics/targets set for the initial funding year of this award. VA may, at its discretion, update these measures and/or targets at any point prior to or during the project period. As applicable, each grantee's performance will be measured against the commitment provided in the application regarding critical performance measures identified in the NOFO.
- c) In addition, the grantee must meet program requirements defined by the regulations and the applicable NOFO. Performance goals, indicators and targets are incorporated here by reference. Performance goals also are detailed in the regulations, NOFO, the application and/or the Grant Recipient Guide on the GPD provider website.

## **21. Electronic Signature**

If the GPD Program Office identifies discrepancies or concerns with any electronic or scanned signature provided, VA reserves the right to request that the document be resubmitted with a true ink signature.

# 8/16/2024 Local Competition Release

The screenshot shows the homepage of the Continuum of Care website. The left sidebar contains navigation links: Membership, CoC Meeting Minutes, Data, Grants, Get Help, Volunteer, Newsletter, Guilford County Cooling Stations (2024), and Contact Us. The main content area features a header with the text "Our County > Health and Human Services > Continuum of Care". Below this is a large blue button labeled "Get Help" and a smaller blue button labeled "Data". A central blue button labeled "Membership" is also present. To the right, there is contact information: "Continuum of Care", "1203 Maple Street", "Greensboro NC 27405", a Facebook link, and an email address "infoCoC@guilfordcountync.gov". An "EVENTS" section lists "CoC Monthly Membership Meeting" on "09/12/2024 9:30 AM - 11:00 AM". A prominent red and white announcement reads "FY 2024-25 Notice of Funding Opportunity (NOFO) Competition Information", stating that the NC 504 Collaborative Applicant has released the FY 2024- FY 2024 Local HUD NOFO Competition Notice, posted Friday, August 16, 2024, with a link to click for details.

The screenshot shows a specific page on the Continuum of Care website titled "FY 2024-2025 HUD Notice of Funding Opportunity (NOFO) Local Competition". The page header includes the Guilford County logo and navigation links: Services, Our County, Business, Get Connected, and How Do I... The left sidebar contains navigation links: Continuum of Care, About, Community Events & Assessments, Calendar, Membership, CoC Meeting Minutes, Data, Grants, Get Help, Volunteer, Newsletter, Guilford County Cooling Stations (2024), and Contact Us. The main content area features a large blue button labeled "Get Help" and a smaller blue button labeled "Data". Below this is a central blue button labeled "Membership". To the right, there is contact information: "Continuum of Care", "1203 Maple Street", "Greensboro NC 27405", a Facebook link, and an email address "infoCoC@guilfordcountync.gov". An "EVENTS" section lists "CoC Monthly Membership Meeting" on "09/12/2024 9:30 AM - 11:00 AM". The main text of the page reads: "The Guilford County Continuum of Care Collaborative Applicant/CoC Lead has released the HUD-NOFO Local Competition Notice. Finalized application information and additional documents will be provided below as they become available:". Below this text are several links: "FY 2024-2025 HUD NOFO Local Competition (Public Notice)", "FY 2024-2025 Local NOFO Competition Supporting Documentation Instructions & Cover Letter", "2024 HUD NOFO Local Competition Timeline", "FY 2024-2025 HUD NOFO Competition Notice", and "2024 HUD NOFO Local Competition Scorecards for Renewal/Expansion and New Applicants". A bolded statement reads: "Applications deadline is Thursday, September 5, 2024 by 11:59pm EST". Below this, it says: "Please complete the project application in e-Snaps, but **do not submit**. Download a PDF copy of the draft completed project application and submit with supplemental documents via zip file".

Continuum of Care | Guilford Co. | FY 2024-2025 HUD Notice of Funding Opportunity

<https://www.guilfordcountync.gov/our-county/health-and-human-services/continuum-of-care/grants/fiscal-year-2024-local-hud-nofo-competition>

**Please complete the project application in e-Snaps, but *do not submit*. Download a PDF copy of the draft completed project application and submit with supplemental documents via zip file via email to [infoCoC@ Guilfordcountync.gov](mailto:infoCoC@ Guilfordcountync.gov).**

Arrangements will be made to provide technical assistance or review of any or all parts of this announcement, the NC 504 CoC Applications process, details, and obligations in a manner that is effective for persons with disabilities or any person with Limited English Proficiency (LEP)

(Se harán arreglos para brindar asistencia técnica o revisar alguna o todas las partes de este anuncio, el proceso de solicitud del CoC NC 504, los detalles y las obligaciones de una manera que sea efectiva para las personas con discapacidades o cualquier persona con dominio limitado del inglés).

**INFORMATION FROM THE HUD OFFICE**

[HUD CoC Competition Page](#)

[FY 2024 Continuum of Care \(CoC\) Program Project Application Frequently Asked Questions \(FAQs\)](#)

HUD will release ARD Report at a further date. The full report is available here: FY2024 CoC Estimated ARD Report (Document forthcoming)

e-Snaps is open for project applications and the portal can be accessed at <https://esnaps.hud.gov/>.

**Project applications must be submitted via email by 11:59pm on Thursday, September 5, 2024 to be considered for this grant cycle.**

New projects may be funded through reallocation of renewal projects or the CoC Bonus for the eligible activities:

- Permanent Housing – Permanent Supportive Housing
- Permanent Housing – Rapid Rehousing
- Transitional Housing

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Continuum of Care | Guilford Co. | FY 2024-2025 HUD Notice of Funding Opportunity

<https://www.guilfordcountync.gov/our-county/health-and-human-services/continuum-of-care/grants/fiscal-year-2024-local-hud-nofo-competition>

- Transitional Housing
- Joint Transitional Housing/Rapid Rehousing
- Supportive Services Only – Coordinated Entry
- Homeless Management Information System (Dedicated HMIS project for the costs at [24 CFR 578.32\(a\)\(4\)](#)) that may only be carried out by the HMIS Lead

New projects may also be funded through a Domestic Violence Bonus specific to services for homeless survivors of domestic violence, dating violence, sexual assault, or stalking for these eligible activities:

- Permanent Housing – Rapid Rehousing
- Joint Transitional Housing/Rapid Rehousing
- Supportive Services Only – Coordinated Entry (one application only)

**INFORMATION FROM THE NC 504 COLLABORATIVE APPLICANT**

[NC 504 Rating and Ranking Policy](#) | [NC 504 Reallocation Policy](#) | [NC 504 Appeals Policy](#)

The Collaborative Applicant will be hosting office hours regarding the NOFO Application on Thursday, August 22, 2024 at 10:30am via [Microsoft Teams](#). For additional information, please email [infoCoC@ Guilfordcountync.gov](mailto:infoCoC@ Guilfordcountync.gov).

The Guilford County CoC Collaborative Applicant Team will be requesting responses for the NC 504 FY 2024- FY 2025 Consolidated NOFO Application from CoC members. Please be on the lookout for an upcoming announcement. Thank you in advance for your partnership and collaboration!

To obtain the recording of and PowerPoint from the Guilford County CoC Grants 101 Workshop, please visit the [CoC Member Portal](#) or email [infoCoC@ Guilfordcountync.gov](mailto:infoCoC@ Guilfordcountync.gov).

**Letter of Intent (LOI)**

[FY 2024-2025 Letter of Intent \(LOI\)](#) are extended until Monday, August 19, 2024 at 3:00pm

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Continuum of Care | Guilford Co. | Grants | Guilford County, NC

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- Contact Us

Our County's Health and Human Services Continuums of Care

## Grants

The Guilford County Continuum of Care (Guilford CoC) coordinates funding efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness.

### Current Year Grant Information

**[FY 2024-25 HUD Notice of Funding Opportunity \(NOFO\) Local Competition](#)**

The Guilford County Continuum of Care Collaborative Applicant/CoC Lead has released information pertaining to the Fiscal Year 2024-2025 HUD NOFO and Local Competition process. All information is available [here](#).

**[Local ESG RFA \(FY 2024-2025\)](#)**

The Guilford County Continuum of Care (CoC) Lead has released the Local Emergency Solutions


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Continuum of Care | Guilford Co. | FY 2024-2025 HUD Notice of Funding Opportunity | 638594436053406462

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 **GUILFORD COUNTY CONTINUUM OF CARE**  
Working to End Homelessness in Guilford County

**Fiscal Year 2024-2025 HUD NOFO LOCAL COMPETITION**  
(U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT NOTICE OF FUNDING OPPORTUNITY)

*This document is Guilford County CoC's notice of public solicitation for new project applications and renewal project applications in response to the Department of Housing and Urban Development's Notice of Funding Opportunity.*

**Date of Notice**  
August 16, 2024

**Purpose**  
The purpose of this notice is to solicit applications for the Department of Housing and Urban Development's (HUD) annual Notice of Funding Opportunity (NOFO) from non-profits and local units of government who are interested in providing housing-related programs and services to individuals and/or families who are experiencing homelessness in Guilford County, North Carolina. Approved applications will be part of a Consolidated Application for Continuum of Care Homeless Assistance Funding, which will be submitted by the Guilford County Continuum of Care's Collaborative Applicant (NC 504) pursuant to the requirements of the 2024-2025 NOFO.

**Description**  
The CoC Program (24 CFR part 578) is designed to promote community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, States, and local governments to quickly re-house homeless individuals, families, persons fleeing domestic violence, and youth, while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless individuals; and to optimize self-sufficiency among those experiencing homelessness.

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The FY2024 2025 NOFO was released on July 31, 2024. The NOFO sets forth the competition rules and processes. This notice summarizes the highlights of the NOFO and includes the local funding processes, deadlines, policies, and procedures. Additional guidance will be shared as HUD issues.

**Funding Amount and Availability**  
 The NC-504 estimated Annual Renewal Demand (ARD) is **\$2,612,817**. Additional funding will be available for a **DV Bonus** of up to 15% of the CoC's Preliminary Pro-Rata Need (PPRN), for **CoC Bonus** up to 12% of the Final Pro-Rata Need (FPRN), and for the annual CoC Planning grant at 5% of the FPRN or \$50,000, whichever is greater. HUD has not certified the exact funding available for the FY 2024 Competition currently. For further information and updates, please see the HUD Exchange website at: [http://www.hud.gov/program\\_offices/comm\\_planning/coc/competition](http://www.hud.gov/program_offices/comm_planning/coc/competition)

**Eligibility**  
 The CoC will accept applications from any member organizations who meet both HUD's eligibility criteria as described in Part 3 of the HUD NOFO and who complete all the CoC's application requirements, including the submission of required documentation and a complete application. **This program requires agency matching of 25% of funds which must come from other sources.**

**Project Applicants (McKinney-Vento Act, 24 CFR 578.13, 24 CFR 3.100)**  
 Eligible project applicants for the CoC Program Competition are found at 24 CFR 578.15 and in the Act and include nonprofit organizations, states, local governments, instrumentalities of state and local governments, Indian Tribes and TDHE (as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103) (TDHEs)). Public housing agencies, as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion. For-profit entities are ineligible to apply for grants or to be subrecipients of grant funds. All applicants **must** have an active registration with SAM.gov (<https://www.sam.gov/SAM>) before submitting their applications. Part III of the NOFO

**Project Types**  
 All projects are considered either "renewal" or "new" projects, and each category has several sub-types with additional criteria and/or considerations. Both victim and non-victim agencies are eligible to apply for the DV Bonus funds, if the project will serve victims of domestic violence. **Each CoC may only submit one new SSO-CE DV Bonus project; however, there is no limit on the number of PH-RRH and Joint TH/PH-RRH DV Bonus projects CoCs may submit.** Section III.B of the NOFO covers the rules for project eligibility in detail.

**Renewal Projects**  
 Awards made under the CoC Program are eligible for renewal with FY 2024 CoC Program funds if they are currently in operation and expire in CY 2025 (the period from January 1, 2025, through December 31, 2025) and eligible FY 2025 renewal projects must have an expiration date in CY 2026 (between January 1, 2026, and December 31, 2026). Projects renewed under the FY 2024 CoC Program Competition NOFO are renewable as set forth in 24 CFR 578.33 to continue ongoing leasing, operating, supportive services, rental assistance, HMIS, and project administrative costs. See III.B.4.c of the HUD CoC NOFO for more information.

**Special types of renewal project applications include:**

- *Expansion Project* - See Section III.B.4.a.(6) of the HUD CoC NOFO.
- *DV Bonus Funds* - See Section I.B.2.b.(6) of the HUD CoC NOFO.
- *Consolidation Projects* - See Sections III.B.a.(7) of the HUD CoC NOFO.

**New Projects**  
 CoCs may submit new projects created through reallocation, CoC Bonus, or a combination of reallocation and CoC Bonus, new DV Bonus projects. See Sections III.B.4.a.(3) of the HUD CoC NOFO.

**Special types of and funding options for new projects include:**

- *CoC Bonus Projects*
- *Domestic Violence, Dating Violence, Sexual Assault, and Stalking Bonus (DV Bonus)*
- *Transition Grant*

See Section I.B.2.b.(30) of the HUD CoC NOFO for more information.

Continuum of Care | Guilford Co. x FY 2024-2025 HUD Notice of Funding Opportunity x 638594436053406462

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**Please refer to the FY 2024-2025 CoC NOFO for more information.**

**Reallocation**  
Reallocation is a process that CoCs use to shift funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's ARD. Refer to Section I.B.3 a. and Section III.B.4 a (3), (4), and (5) of the HUD CoC NOFO for new project reallocations. Refer to Sections III.C.4 a. and b. of the HUD CoC NOFO for the project eligibility and project quality thresholds established by HUD. Refer to Section I.B.24 of the HUD CoC NOFO for more information regarding transitional grant reallocations.

**Project Ranking Process**  
HUD requires that all projects be ranked and prioritized in a two-tiered list. Tier 1 will be the top local priority projects. Tier 2 will be lower priority projects. Either new or renewal projects may be ranked in Tier 1 or Tier 2. The placement of each project on the priority list will be determined through a multi-stage process including review by the Guilford County CoC System Performance and Evaluation Committee (SPEC) and the Guilford County CoC Board of Directors, prior to review by the Guilford County CoC voting membership. Based on the highly competitive nature of the grant program, ranking of each project will be critical in determining the likelihood of funding. Projects ranked in Tier 2 have a low probability of funding.

Renewal projects will be reviewed and ranked through the CoC process based on performance. New project proposals will be reviewed in reference to organizational capacity, strategic priority, project approach and design, and cost effectiveness and ranked through the CoC process.

**How to Apply**  
Organizations intending to submit an application for the FY2024-2025 CoC Local Notice of Funding Opportunity (NOFO) must submit a complete project application drafted in e-Snaps, but do not submit and supplemental documents via email at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov) no later than 11:59pm on Thursday, September 5, 2024. All complete applications received by these deadlines will be reviewed. Late applications will not be reviewed absent extreme mitigating circumstances.

As prescribed by HUD, a single, consolidated submission of all selected and ranked projects in Guilford County will be submitted to HUD by the NC 504 Collaborative Applicant, upon approval by the SPEC, CoC Board, and CoC Membership. Funding will be derived from federal funds and is subject to funding availability.

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Continuum of Care | Guilford Co. x FY 2024-2025 HUD Notice of Funding Opportunity x 638594436053406462

https://www.guilfordcountync.gov/home/showpublisheddocument/15269/638594436053406462

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bility under the NOFO. The Consolidated Application deadline is October 30, 2024, by 8:00 p.m. EST.

**Deadline for submission:**  
**Project Application** – Please complete application in e-Snaps, but do not submit. Download the PDF and submit in a zip file with supplemental documents no later than 11:59 PM on Thursday, September 5, 2024, via email at [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).

**How to Obtain Further Information**  
Please direct all inquiries concerning this local NOFO Competition to:

Cheri Neal  
CoC Program Manager  
Guilford County Department of Health & Human Services  
Phone: (336) 641-7196  
Email: [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov)

3

All parts of the 2024-2025 CoC Consolidated Application will be publicly posted and available to the community for inspection.

Arrangements will be made to provide technical assistance or review of any or all parts of this announcement, the NC-504 CoC applications process, details, and obligations in a manner that is effective for persons with disabilities or any person with Limited English Proficiency (LEP). (Se harán arreglos para brindar asistencia técnica o revisar alguna o todas las partes de este anuncio, el proceso de solicitud del CoC NC-504, los detalles y las obligaciones de una manera que sea efectiva para las personas con discapacidades o cualquier persona con dominio limitado del inglés).

The local Guilford County CoC competition, timeline, and application details are available as part of the local NOFO Competition packet and on the Guilford County CoC website at <https://www.guilfordcountync.gov/our-county/human-services/continuum-of-care/grants>.

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Continuum of Care | Guilford Co. | FY 2024-2025 HUD Notice of Funding Opportunity | 638594437637953160

https://www.guilfordcountync.gov/home/showpublisheddocument/15273/638594437637953160

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1. **Eligible Housing**  
 a. **Assessing Potential for the Organization**  
 b. **Housing Eligibility**  
 c. **Multi-Level Assistance Projects & Other Housing Elements**

**How to Obtain Further Information**  
 Please direct all inquiries concerning this Local HUD Notice of Funding Opportunity to:

Office Lead  
 Guilford County Department of Health & Human Services  
 CAC Program Manager/Collection Specialist of the CAC  
 Email: [hhscac@guilfordcountync.gov](mailto:hhscac@guilfordcountync.gov)  
 Phone: 336-339-1100

**2024-2025 HUD HUD Local Competition Grant Information**

Agency Name: \_\_\_\_\_  
 Nature of Project (Selected Project or New Project): \_\_\_\_\_  
 Project Type:  
 Permanent Supportive Housing (PSH)  
 Homelessness Entry  
 New "Rapid Re-Housing" Project  
 Transitional Services (including SHS) and Coordinated Entry  
 Other: \_\_\_\_\_  
 Estimated Housing Units: \_\_\_\_\_

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Continuum of Care | Guilford Co. | FY 2024-2025 HUD Notice of Funding Opportunity | 638594437637953160

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**Proposed Funding Amount:** \_\_\_\_\_  
**Name and Contact Information of Agency Contact Person:** \_\_\_\_\_  
**Name and Contact Information of the Person Responsible for Preparing the Application for a Grant:** \_\_\_\_\_

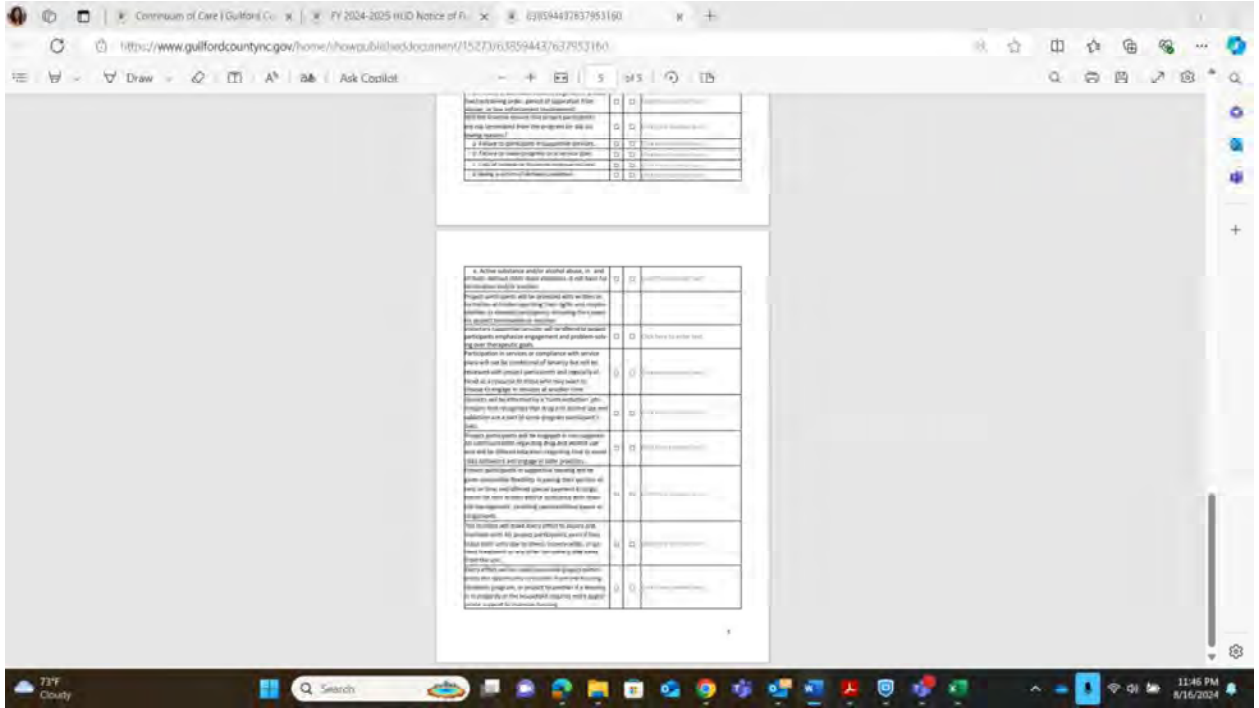
Agency Name and Contact Information  
 The Agency Name and Contact Information of the Agency Contact Person and the Agency Responsible for Preparing the Application for a Grant must be provided in the Agency Information section of the application. The Agency Name and Contact Information of the Agency Contact Person and the Agency Responsible for Preparing the Application for a Grant must be provided in the Agency Information section of the application.

**HOUSING FIRST ASSESSMENT (New Applicants Only)**

New applicants complete the Housing First Assessment form below and return the completed assessment via email to [hhscac@guilfordcountync.gov](mailto:hhscac@guilfordcountync.gov) with the project application. Additionally, please include a complete copy of the Agency's Operational Plan, Internal and External Policies with the completed assessment for each of the Grantee's funded projects.

HOUSING FIRST ASSESSMENT	YES	NO	COMMENTS/RECOMMENDATION
The Grantee will follow a "Housing First" approach that is evidenced in the agency's operating policies and procedures and related documents?	<input type="checkbox"/>	<input type="checkbox"/>	Provide a project plan.
The Grantee will provide these participants and housing from the external from the Coordinated Entry System?	<input type="checkbox"/>	<input type="checkbox"/>	Provide a project plan.
The Grantee/ Programs or projects that conduct point assessments referred through operational entry (PE) will work through the CAC process to ensure that these individuals or families have access to housing (not service alone)?	<input type="checkbox"/>	<input type="checkbox"/>	Provide a project plan.
Are people with disabilities offered equal opportunities to participate in the grantee's operations, whether they are people with disabilities, and living in homes, that accommodate disabilities?	<input type="checkbox"/>	<input type="checkbox"/>	Provide a project plan.
The Grantee will comply with HUD Equal Access and Choice Housing rules?	<input type="checkbox"/>	<input type="checkbox"/>	Provide a project plan.
The Grantee will ensure that program participants are not assessed and rated on the following: a. Housing status or in arrears b. Active or history of substance use or mental illness c. Being in a prior homelessness intervention d. History of domestic violence (e.g., lack of police involvement or the period of separation from spouse, or an individual assessment)	<input type="checkbox"/>	<input type="checkbox"/>	Provide a project plan.
Will the Grantee ensure that project participants are not terminated from the program for not being "ready"?	<input type="checkbox"/>	<input type="checkbox"/>	Provide a project plan.

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	A	B	C	D	E
	PROJECT APPLICATION: HOUSING FIRST	Source of Information	Allowable Points	Points Received	Comments
1	Does the project quickly move participants into permanent housing?	Project Application: Housing First, Question 38-5a	If YES = 5 points If NO = 0 points		
2	Does the project screen out program participants who have the following barriers? [Having too little or little income, Active substance use or history of substance use, Untreated mental health concerns, Having a criminal record except for state-mandated exceptions, History of victimization (e.g., domestic violence, sexual assault, childhood abuse)]	Project Application: Housing First, Question 38-5b	If none of the above checked = 0 points All other boxes/items checked = 5 points		
3	Will the project terminate program participant for any of the following reasons? [Failure to participate in supportive services, Failure to make progress on a service plan, Loss of income or failure to increase income, or any other activity not covered in a lease agreement, typically found for unassisted persons in the project's geographic area]	Project Application: Housing First, Question 38-5c	If none of the above checked = 0 points All other boxes/items checked = 5 points		
4	Does the project follow a Housing First Approach?	Project Application: Housing First, Question 38-5d	If YES = 5 points If NO = 0 points		
5	Does the agency's policies and procedures comport to the Housing First Approach regulation?	NC 504 Housing First Assessment Report - New Agency/Supplemental Information	If YES = 5 points If NO = 0 points		
6	Did the agency submit all of the required documents for the Housing First Assessment?	NC 504 Housing First Assessment Report - New Agency/Supplemental Information	If YES = 5 points If NO = 0 points		
7	Did the agency complete the Housing First Assessment checklist?	NC 504 Housing First Assessment Report - New Agency/Supplemental Information	If YES = 5 points		

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A3 Does the agency have any unresolved HUD Monitoring and/or OIG Audit finding(s) concerning any previous grant term related to this renewal project request? If yes, did the agency provide an explanation?

PROJECT DESCRIPTION: PROJECT INFORMATION	Source of Information	Allowable Points	Points Received	Comments
Did the agency submit their previous year's Annual Performance Report (APR) on time?	Project Application: All Projects Recipient Performance Screen Question 1	If YES = 5 points If NO = 0 points		
Does the agency have any unresolved HUD Monitoring and/or OIG Audit finding(s) concerning any previous grant term related to this renewal project request? If yes, did the agency provide an explanation?	Project Application: All Projects Recipient Performance Screen Question 2	If YES = 0 points If NO = 5 points		
Does the agency draw funds quarterly for your current renewal project? If no, did the agency provide a reasonable explanation?	Project Application: All Projects Recipient Performance Screen Question 3	If YES = 5 points If NO = 0 points		
Have any funds remained available for recapture by HUD for the most recently expired grant term related to this renewal project request?	Project Application: All Projects Recipient Performance Screen Question 4	If YES = 0 points If NO = 4 points		
Is your organization, or subrecipient, a victim service provider defined in 24 CFR 578.3?	Project Application: Screen 3A, Question 7	If YES = 0 points If NO = 5 points		
Will this project include replacement reserves in the Operating budget?	Project Application: Screen 3A, Question 8	If YES = 0 points If NO = 5 points		
<b>Did the agency provide a description of the project that addresses the entire scope of the proposed project?</b> Note: Provide a detailed description of the scope of the project including the target population(s) to be served, project plan for addressing the identified housing and supportive service needs, anticipated project outcome(s), coordination with other organizations (e.g., federal, state, nonprofit), and how the CoC Program funding will be used.	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		

Cover Sheet Housing First Renewal PSH Renewal-RRH Renewal-Joint TH-PH-RRH

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B7

Agency Name:				
Project Information				
Project Name:				
Project Type:				
Agency's Funding Request:				
Funding Recommendation by Reviewer:				
	Housing First Points Awarded			
	Project Application Points Awarded			
	Total Points	0		

Cover Sheet Housing First Renewal PSH Renewal-RRH Renewal-Joint TH-PH-RRH

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A2 Did the agency submit their previous year's Annual Performance Report (APR) on time?

PROJECT DESCRIPTION	Source of Information	Allowable Points	Points Received	Comments
Did the agency submit their previous year's Annual Performance Report (APR) on time?	Project Application: All Projects Recipient Performance Screen Question 1	If YES = 5 points If NO = 0 points	5	
Does the agency have any unresolved HUD Monitoring and/or OIG Audit finding(s) concerning any previous grant term related to this renewal project request? If yes, did the agency provide an explanation?	Project Application: All Projects Recipient Performance Screen Question 2	If YES = 0 points If NO = 5 points	5	
Does the agency draw funds quarterly for your current renewal project? If no, did the agency provide a reasonable explanation?	Project Application: All Projects Recipient Performance Screen Question 3	If YES = 5 points If NO = 0 points	5	
Have any funds remained available for recapture by HUD for the most recently expired grant term related to this renewal project request?	Project Application: All Projects Recipient Performance Screen Question 4	If YES = 0 points If NO = 5 points	5	
Is your organization, or subrecipient, a victim service provider defined in 24 CFR 578.37?	Project Application: Screen 3A, Question 7	Yes/NO	0	
Will this project include replacement reserves in the Operating budget?	Project Application: Screen 3A, Question 8	If YES = 0 points If NO = 5 points	5	
Did the agency provide a description of the project that addresses the entire scope of the proposed project? <b>Note:</b> Provide a detailed description of the scope of the project including the target population(s) to be served, project plan for addressing the identified housing and supportive service needs, anticipated project outcome(s), coordination with other organizations (e.g., federal, state, nonprofit), and how the CoC Program funding will be used.	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10	10	
<b>Subpopulations:</b> Did applicant agency identify all populations they intend to serve? a. Youth (under age 25) b. Families c. Survivors: Persons who have experienced trauma or a lack of safety due to domestic violence, dating violence, sexual assault, stalking, human trafficking, or other dangerous traumatic or life threatening conditions. d. Substance Use	Screen 3B, Question 2	Not specified: 0 One (1) population: 2.5 Two (2) populations: 5	10	

Cover Sheet Housing First Renewal PSH Renewal-RRH Renewal-Joint TH-PH-RRH

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B2 Project Application: All Projects Recipient Performance Screen Question 1

PROJECT INFORMATION:	Source of Information	Allowable Points	Points Received	Comments
Did the agency submit their previous year's Annual Performance Report (APR) on time?	Project Application: All Projects Recipient Performance Screen Question 1	If YES = 5 points If NO = 0 points		
Does the agency have any unresolved HUD Monitoring and/or OIG Audit finding(s) concerning any previous grant term related to this renewal project request? If yes, did the agency provide an explanation?	Project Application: All Projects Recipient Performance Screen Question 2	If YES = 0 points If NO = 5 points		
Does the agency draw funds quarterly for your current renewal project? If no, did the agency provide a reasonable explanation?	Project Application: All Projects Recipient Performance Screen Question 3	If YES = 5 points If NO = 0 points		
Have any funds remained available for recapture by HUD for the most recently expired grant term related to this renewal project request?	Project Application: All Projects Recipient Performance Screen Question 4	If YES = 0 points If NO = 5 points		
Is your organization, or subrecipient, a victim service provider defined in 24 CFR 578.37?	Project Application: Screen 3A, Question 7	If YES = 0 points If NO = 5 points		
Will this project include replacement reserves in the Operating budget?	Project Application: Screen 3A, Question 8	If YES = 0 points If NO = 5 points		
Did the agency provide a description of the project that addresses the entire scope of the proposed project? <b>Note:</b> Provide a detailed description of the scope of the project including the target population(s) to be served, project plan for addressing the identified housing and supportive service needs, anticipated project outcome(s), coordination with other organizations (e.g., federal, state, nonprofit), and how the CoC Program funding will be used.	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
<b>Subpopulations:</b> Did applicant agency identify all populations they intend to serve? a. Youth (under age 25) b. Families c. Survivors: Persons who have experienced trauma or a lack of safety due to domestic violence, dating violence, sexual assault, stalking, human trafficking, or other dangerous traumatic or life threatening conditions. d. Substance Use	Screen 3B, Question 2	Not specified: 0 One (1) population: 2.5 Two (2) populations: 5		

Cover Sheet Housing First Renewal PSH Renewal-RRH Renewal-Joint TH-PH-RRH

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B10 =SUM(B8:B9)

Agency Name:	
<b>Project Information</b>	
Project Name:	
Project Type:	
Agency's Funding Request:	
Funding Recommendation by Reviewer:	
Housing First Points Awarded	
Project Application Points Awarded	
Total Points	
<b>Project Expansion Applications Only (Not Scored/Informational Only)</b>	
Is this a 'Project Expansion' of an eligible renewal project? (Project Application Screen 3C, Question 1)	Yes/No
Will this project increase the number of program participants? (Project Application: Screen 3C, Question 2)	Yes/No
Will this project provide additional supportive services to program participants? (Project Application: Screen 3C, Question 3)	Yes/No
Will this project bring existing facilities up to government health or safety standards? (Project Application: Screen 3C, Question 4)	Yes/No
<b>New Project Funding Type</b> Select Type (place 'X' in appropriate row)	
Bonus (TH/RRH, RRH, PSH, or SSO-CE)	
DV Bonus (TH/RRH, RRH, or SSO-CE)	
New Project created through reallocated funds (any project type)	

Cover Sheet Housing First New-PSH New-PH-RRH New-TH-PH-RRH New-SSO-CE New-HMIS

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PROJECT APPLICATION: HOUSING FIRST	Source of Information	Allowable Points	Points Received	Comments
Does the project quickly move participants into permanent housing?	Project Application: Housing First, Question 2B-3a	If YES = 5 points If NO = 0 points		
Does the project screen out program participants who have the following barriers? (Having too little or little income, active substance use or history of substance use, Untreated mental health concerns, Having a criminal record except for state-mandated exceptions, history of victimization (e.g., domestic violence, sexual assault, childhood abuse))	Project Application: Housing First, Question 3B-3b	If none of the above checked = 0 points All other boxes/items checked = 5 points		
Will the project terminate program participants for any of the following reasons? (Failure to participate in supportive services, Failure to make progress on a service plan, Loss of income or failure to increase income, or any other activity not covered in a lease agreement, typically found for unassisted persons in the project's geographic area)	Project Application: Housing First, Question 3B-3c	If none of the above checked = 0 points All other boxes/items checked = 5 points		
Does the project follow a Housing First Approach?	Project Application: Housing First, Question 3B-3d	If YES = 3 points If NO = 0 points		
Does the agency's policies and procedures comport to the Housing First Approach regulation?	NC 304 Housing First Assessment Report - New Agency/Supplemental Information	If YES = 5 points If No = 0 points		
Did the agency submit all of the required documents for the Housing First Assessment?	NC 304 Housing First Assessment Report - New Agency/Supplemental Information	If YES = 5 points If No = 0 points		
Did the agency complete the Housing First Assessment checklist?	NC 304 Housing First Assessment Report - New Agency/Supplemental Information	If YES = 5 points If NO = 0 points		
<b>TOTAL ALLOWABLE POINTS</b>		25		
<b>REVIEWER TOTAL FOR THIS PROJECT PROPOSAL</b>			0	

Cover Sheet Housing First New-PSH New-PH-RRH New-TH-PH-RRH New-SSO-CE New-HMIS

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A3 Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in leveraging Federal, State, local and private sector funds?

Project Application: Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
1 Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in effectively utilizing Federal funds and performing the activities proposed in the application?	Project Application: Screen 28, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
2 Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in leveraging Federal, State, local and private sector funds?	Project Application: Screen 28, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
3 Did the applicant agency describe the organization's (and subrecipient(s) if applicable) financial management?	Project Application: Screen 28, Question 3	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
4 Are there any unresolved HUD monitoring or OIG audit findings for any HUD grants (including ESG) under the organization?	Project Application: Screen 28, Question 4	If YES = enter negative ten (-10) points If NO = 10 points		
5 Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: Screen 28, Question 4a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
<b>Project Application: Project Information</b>				
6 Will funds requested in this new project application replace state or local government funds (24 CFR 578.87 (a))?	Project Application: Screen 2A, Question 8	If YES = 0 points If NO = 5 points		
7 Did the applicant agency provide a description that addresses the entire scope of the proposed project?	Project Application: Screen 3B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
8 Did the applicant agency provide a timeline for rapid implementation for the proposed project in the chart from the date of the execution of the grant agreement?	Project Application: Screen 3B, Question 2	Timeline Does Not Address Expectations: 0 Timeline Minimally Addresses Expectations: 2.5 Timeline Adequately Addresses Expectations: 5 Timeline Exceeds Expectations: 10		
9 Did the applicant agency identify all populations they intend to	Project Application: For Information Purposes Only		0	

Cover Sheet Housing First New-PSH New-PH-RRH New-TH-PH-RRH New-SO-CE New-HMIS

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B37 NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy

Project Application: Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
1 Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in effectively utilizing Federal funds and performing the activities proposed in the application?	Project Application: Screen 28, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
2 Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in leveraging Federal, State, local and private sector funds?	Project Application: Screen 28, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
3 Did the applicant agency describe the organization's (and subrecipient(s) if applicable) financial management?	Project Application: Screen 28, Question 3	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
4 Are there any unresolved HUD monitoring or OIG audit findings for any HUD grants (including ESG) under the	Project Application: Screen 28, Question 4	If YES = enter negative ten (-10) points If NO = 10 points		
5 Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: Screen 28, Question 4a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
<b>Project Application: Project Information</b>				
6 Will funds requested in this new project application replace state or local government funds (24 CFR 578.87 (a))?	Project Application: Screen 2A, Question 8	If YES = 0 points If NO = 5 points		
7 Did the applicant agency provide a description that addresses the entire scope of the proposed project?	Project Application: Screen 2B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
8 Did the applicant agency provide a timeline for rapid implementation for the proposed project in the chart from the date of the execution of the grant agreement?	Project Application: Screen 3B, Question 2	Timeline Does Not Address Expectations: 0 Timeline Minimally Addresses Expectations: 2.5 Timeline Adequately Addresses Expectations: 5 Timeline Exceeds Expectations: 10		

Cover Sheet Housing First New-PSH New-PH-RRH New-TH-PH-RRH New-SO-CE New-HMIS

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B37 NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy

Project Application: Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in effectively utilizing federal funds and performing the activities proposed in the application?	Project Application: Screen 2B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in leveraging federal, state, local and private sector funds?	Project Application: Screen 2B, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) financial management?	Project Application: Screen 2B, Question 3	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Are there any unresolved HUD monitoring or OIG audit findings for any HUD grants (including ESG) under the organization?	Project Application: Screen 2B, Question 4	If YES = enter negative ten (-10) points If NO = 10 points		
Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: Screen 2B, Question 4a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
Project Application: Project Information	Source of Information	Allowable Points	Points Received	Comments
Will funds requested in this new project application replace state or local government funds (24 CFR 378.87 (h))?	Project Application: Screen 3A, Question 8	If YES = 0 points If NO = 5 points		

Cover Sheet | Housing First | New-PSH | New-PH-RRH | **New-TH-PH-RRH** | New-SSO-CE | New-HMIS

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2024 NCRG New Applicant Scorecard (1) - Protected... - Saved to this PC

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B27 NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy

Project Application: Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in effectively utilizing federal funds and performing the activities proposed in the application?	Project Application: Screen 2B, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in leveraging federal, state, local and private sector funds?	Project Application: Screen 2B, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) financial management?	Project Application: Screen 2B, Question 3	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Are there any unresolved HUD monitoring or OIG audit findings for any HUD grants (including ESG) under the organization?	Project Application: Screen 2B, Question 4	If YES = enter negative ten (-10) points If NO = 10 points		
Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: Screen 2B, Question 4a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		

Cover Sheet | Housing First | New-PSH | New-PH-RRH | **New-TH-PH-RRH** | New-SSO-CE | New-HMIS

Ready 73°F Cloudy Search 11:52 PM 8/16/2024

AutoSave 2024 NOFO New Applicant Scorecard (1) - Protected... Saved to this PC

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PROTECTED VIEW Be careful—files from the Internet can contain viruses. Unless you need to edit, it's safer to stay in Protected View. Enable Editing

B28 NC 504 Supplemental Information, Non-Discrimination Policy and Equal Access Policy


Project Application: Experience of Applicant, Subrecipient(s) and Other Partners	Source of Information	Allowable Points	Points Received	Comments
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in effectively utilizing federal funds and performing the activities proposed in the application?	Project Application: Screen 28, Question 1	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s) if applicable) experience in leveraging Federal, State, local and private sector funds?	Project Application: Screen 28, Question 2	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Did the applicant agency describe the organization's (and subrecipient(s), if applicable) financial management?	Project Application: Screen 28, Question 3	Does Not Address Expectations/Requirements: 0 Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5 Exceeds Expectations/Requirements: 10		
Are there any unresolved HUD monitoring or HUD audit findings for any HUD grants (including ESG) under the organization?	Project Application: Screen 28, Question 4	If YES - enter negative ten (-10) points If NO - 10 points		
Did the applicant agency describe the unresolved monitoring or audit findings?	Project Application: Screen 28, Question 4a	If response to above question is NO, enter zero (0) Minimally Addresses Expectations/Requirements: 2.5 Adequately Addresses Expectations/Requirements: 5		
Project Application: Project Information	Source of Information	Allowable Points	Points Received	Comments

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Continuum of Care (Guilford, C) | IV 2524-2025 HUD Notice of Funding Opportunity | 53839074346110000

https://www.guilfordcountync.gov/home/show.do?document/15249/62859074346110000

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**GUILFORD COUNTY CONTINUUM OF CARE**  
Working to End Homelessness in Guilford County

**Guilford County Continuum of Care (NC 504)  
Rating and Ranking Policy and Procedure**

**Overview**

The Department of Housing and Urban Development (HUD) requires Continuum of Care to rank all projects being recommended for funding into two tiers as part of the Consolidated Application's Priority Listing. Tier 1 is defined by HUD in the Notice of Funding Opportunity (NOFO) as a percentage of a Continuum of Care's (CoC) Annual Renewal Demand (ARD) approved by HUD. Tier 1 projects traditionally maintain existing funding in the NOFO competition provided the CoC's Consolidated Application is properly submitted and meets the minimum threshold score established by HUD. The amount of funding available in Tier 2 is the difference between Tier 1 and the CoC's ARD plus any amount available for all bonus projects. Tier 2 projects must compete nationally for funding and are therefore at risk of not being awarded.

Renewal projects are those with existing CoC funded grant agreements, as noted on the approved HUD Grant Inventory Worksheet (GIW). New projects are those applying for the first time in an open competition period. Project applications are ordered from highest to lowest ranking in the CoC's Priority Listing, and in accordance with HUD's two-tier system as outlined in the NOFO. CoC's that score high enough on their NOFO may be awarded Bonus Funds and/or Domestic Violence Bonus Funds. Both types of Bonus Funds are awarded by HUD based on a competitive national rating and ranking process.

Projects are ranked according to their assigned score in the Priority Listing in two Tiers as outlined below, except for projects supporting the CoC infrastructure (i.e. HMIS, SSO-CE)

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Continuum of Care | Guilford Co. | FY 2024-2025 HUD Notice of F... | 2024 Letter of Intent for the CoC... | 63859425533245855

https://forms.office.com/Pages/ResponsePage.aspx?id=1Gow\_2d43uA4F-vp8R0X3j4yM73NC3yE1pC155H42V6G00NNDL5UJ-NX8U7YV8THUVXTEZND04U8um...

## 2024 Letter of Intent for the CoC Notice of Funding Opportunities Grant (NOFO)

For any new and returning applicants who plan to apply for the CoC NOFO. Please apply by Monday, August 19, 2024 at 3:00pm.

\* Required

1. Name of the Agency \*

Enter your answer

2. Is your agency a member of the NC 504 Guilford County Continuum of Care? \*

Yes


No (Please submit a CoC Membership Application, located on the CoC Website)

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Continuum of Care | Guilford Co. | FY 2024-2025 HUD Notice of F... | 638590767288770000

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**GUILFORD COUNTY CONTINUUM OF CARE**  
Working to End Homelessness in Guilford County

**NC-504 GUILFORD COUNTY  
REALLOCATION POLICY**

**Purpose and Background**

The Guilford County Continuum of Care (CoC) manages the performance of all CoC projects in the community and strategically allocates resources based on cost, performance, and outcome data to improve how resources are utilized to end homelessness. In the event it is determined that the allocated resources/funds were not utilized optimally, the CoC reserves the right to reallocate these funds to other projects or organizations. The term "reallocation of funds" refers to the process of redirecting financial resources from one area or program to another. It involves shifting money or budgetary allocation from existing programs, projects, or initiatives to support different priorities or address changing needs.

Chronic underspending or underperformance by a project risks recapture of those funds by the federal Department of Housing and Urban Development (HUD), making those funds unavailable to the community for use in ending homelessness. Therefore, the CoC has developed this policy to provide a clear and transparent process for reallocation for the purpose of keeping these funds in our community.

**Definitions**

a. *Chronic Underspending:* Occurs when a project that has been funded consecutively for 3

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Continuum of Care | Guilford Co. | FY 2024-2025 HUD Notice of Funding Opportunity | 2024 Letter of Intent for the CoC | 638594253533245855

https://www.guilfordcountync.gov/our-county/health-and-human-services/continuum-of-care/grants/fiscal-year-2024-local-hud-nofo-competition

- Permanent Housing – Rapid Rehousing
- Joint Transitional Housing/Rapid Rehousing
- Supportive Services Only – Coordinated Entry (one application only)

**INFORMATION FROM THE NC 504 COLLABORATIVE APPLICANT**

[NC 504 Rating and Ranking Policy](#) | [NC 504 Reallocation Policy](#) | [NC 504 Appeals Policy](#)

The Collaborative Applicant will be hosting office hours regarding the NOFO Application on Thursday, August 22, 2024 at 10:30am via [Microsoft Teams](#). For additional information, please email [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).


The Guilford County CoC Collaborative Applicant Team will be requesting responses for the NC-504 FY 2024- FY 2025 Consolidated NOFO Application from CoC members. Please be on the lookout for an upcoming announcement. Thank you in advance for your partnership and collaboration!

To obtain the recording of and PowerPoint from the Guilford County CoC Grants 101 Workshop, please visit the [CoC Member Portal](#) or email [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).

**Letter of Intent (LOI)**

[FY 2024-2025 Letter of Intent](#) (LOIs) are extended until Monday, August 19, 2024 at 3:00pm

Free viewers are required for some of the attached documents. They can be downloaded by clicking on the icons below.




Last updated or reviewed on August 16, 2024

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Continuum of Care | Guilford Co. | FY 2024-2025 HUD Notice of Funding Opportunity | 638594253533245855

https://www.guilfordcountync.gov/home/showpublishedcontent/1528776/3894253533245855

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**GUILFORD COUNTY CONTINUUM OF CARE**  
Working to End Homelessness in Guilford County

**APPEALS PROCESS**

The NC 504 Continuum of Care System Performance and Evaluation Committee (SPEC) may recommend that some new and/or renewal applicants not be included in the final CoC Consolidated Application to HUD or the Regional Application to the NC Department of Health and Human Services (NC DHHS). To ensure fairness, these projects will have the opportunity to appeal the NC-504 SPEC's decision.

**Who May Appeal:** New or renewal applicants whose projects were not included in the final date of CoC Project Priority Listing or ESG Project Applications and approved for submission to NC DHHS may appeal.

**How to Appeal:**

1. Applicants must submit a letter of appeal signed by an applicant agency's Executive Director with any relevant supporting documentation within a timeframe to be designated by the CoC.
2. Appeal documentation should be submitted to the SPEC Chair by the deadline using this link.
3. Appeals submitted after the published deadline will not be considered.
4. Appeals must present evidence that shows the SPEC made a clear error, did not follow the advertised process, engaged in discriminatory activity, had a

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FY 2024-2025 HUD NOFO Local Competition Announcement - Message (HTML)

File Message Help Tell me what you want to do

Delete Archive Reply Reply Forward Share to All Apps

County Car RSVP To Manager Done

Team Email Done

Reply & Delete Create New

Quick Steps Move

Assign Policy Categorize

Follow Up

Read Aloud Immersive Reader


Translate Zoom

Reply with Scheduling Poll

Phone Alert Report

Viva Insights

### FY 2024-2025 HUD NOFO Local Competition Announcement


 Guilford County Continuum of Care <GuilfordCountyCoC@info.guilfordcountync.gov>  
To: Maria Lyons LeGrande

Reply Reply All Forward

Fri 8/16/2024 11:44 PM

ⓘ If there are problems with how this message is displayed, click here to view it in a web browser.

[View as a webpage / Share](#)



**GUILFORD COUNTY CONTINUUM OF CARE**  
Working to End Homelessness in Guilford County

**Guilford County CoC Announcement**

**Notice of Funding Opportunity (NOFO) HUD Grant applications are now being accepted! (Fiscal Year 2024 - 2025)**

The Guilford County Continuum of Care Collaborative Applicant/CoC Lead has released the [FY2024-2025 HUD NOFO Local Competition Notice](#). Eligible applicants seeking to apply can find all application information and additional documents as they become available here:

[FY 2024 -2025 HUD NOFO Local Competition Grants Page](#)

# 8/27/2024 Local Competition Release with ARD information

The screenshot shows the homepage of the Guilford County Continuum of Care. The browser address bar displays [guilfordcountync.gov/our-county/human-services/continuum-of-care](http://guilfordcountync.gov/our-county/human-services/continuum-of-care). The page features a blue sidebar with navigation links: Data, Grants, Get Help, Volunteer, Newsletter, Guilford County Cooling Stations (2024), and Contact Us. The main content area has a header with the text "Our County's Health and Human Services" and a large "Continuum of Care" title. Below the title are three blue buttons: "Get Help", "Data", and "Membership". To the right, contact information is provided: "Continuum of Care, 1203 Maple Street, Greensboro NC 27402", a Facebook link, and an email address: [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov). An "EVENTS" section lists two meetings: "CoC Monthly Membership Meeting (09/11/2024 9:30 AM - 11:00 AM)" and "CoC Monthly Membership Meeting (10/11/2024 9:30 AM - 11:00 AM)". A news alert states: "HUD has released the estimated Annual Renewal Demand and Bonus Funding amount and availability. [Posted: Tuesday, August 27, 2024] Click [here](#) for details." At the bottom, a red link reads "FY 2024-25 Notice of Funding Opportunity (NOFO)". The Windows taskbar at the bottom shows the date as 8/27/2024 and the time as 4:23 PM.

The screenshot shows the "FY 2024-2025 HUD Notice of Funding Opportunity (NOFO) Local Competition" page. The browser address bar displays [guilfordcountync.gov/our-county/health-and-human-services/continuum-of-care/grants/fiscal-year-2024-local-hud-nofo-competition](http://guilfordcountync.gov/our-county/health-and-human-services/continuum-of-care/grants/fiscal-year-2024-local-hud-nofo-competition). The page has a blue sidebar with navigation links: Continuum of Care, About, Community Events & Announcements, Calendar, Membership, CoC Meeting Minutes, Data, Grants, Get Help, Volunteer, Newsletter, Guilford County Cooling Stations (2024), and Contact Us. The main content area has a header with the text "Our County's Health and Human Services" and a large "FY 2024-2025 HUD Notice of Funding Opportunity (NOFO) Local Competition" title. Below the title are links for "Print", "Feedback", "Share & Bookmark", and "Font Size". The main text reads: "The Guilford County Continuum of Care Collaborative Applicant/CoC Lead has released the HUD NOFO Local Competition Notice. Finalized application information and additional documents will be provided below as they become available:". Below this are several links: "[FY 2024-2025 HUD NOFO Local Competition \(Public Notice\) \(updated on 8/27/2024\)](#)", "[FY 2024-2025 Local NOFO Competition Supporting Documentation Instructions & Cover Letter](#)", "[2024 HUD NOFO Local Competition Timeline](#)", and "[FY 2024-2025 HUD NOFO Competition Notice](#)". A bolded section states: "Applications deadline is Thursday, September 5, 2024 by 11:59pm EST". Below this is a paragraph: "Please complete the project application in e-Snaps, but **do not submit**. Download a PDF copy of the draft completed project application and submit with supplemental documents via zip file via email to [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov)." At the bottom, a paragraph states: "Arrangements will be made to provide technical assistance or review of any or all parts of this announcement, the NC 504 CoC applications process, details, and obligations in a manner that is effective for persons with disabilities or any person with Limited English Proficiency (LEP)." The Windows taskbar at the bottom shows the date as 8/27/2024 and the time as 4:23 PM.



guilfordcountync.gov/our-county/health-and-human-services/continuum-of-care/grants/fiscal-year-2024-local-hud-nofo-competition

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Please complete the project application in e-Snaps, but [do not submit](#). Download a PDF copy of the draft completed project application and submit with supplemental documents via zip file via email to [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).

Arrangements will be made to provide technical assistance or review of any or all parts of this announcement, the NC 504 CoC applications process, details, and obligations in a manner that is effective for persons with disabilities or any person with Limited English Proficiency (LEP).

Se harán arreglos para brindar asistencia técnica o revisar alguna o todas las partes de este anuncio, el proceso de solicitud del CoC NC 504, los detalles y las obligaciones de una manera que sea efectiva para las personas con discapacidades o cualquier persona con dominio limitado del inglés.

**INFORMATION FROM THE HUD OFFICE**

[HUD CoC Competition Page](#)

[FY 2024 Continuum of Care \(CoC\) Program Project Application Frequently Asked Questions \(FAQs\)](#)

[Funding Amount and Availability](#)

The NC-504 estimated Annual Renewal Demand (ARD) is: \$2,612,817. Additional funding will be available for an estimated DV Bonus of \$523,695, for an estimated CoC Bonus of \$426,956, and for an estimated annual CoC Planning grant of \$177,898. HUD has not certified the exact funding available for the FY 2024 Competition currently. For further information and updates, please see the HUD Exchange website at: [https://www.hud.gov/program\\_offices/comm\\_planning/coc/competition](https://www.hud.gov/program_offices/comm_planning/coc/competition)

e-Snaps is open for project applications and the portal can be accessed at <https://esnaps.hud.gov/>.

**Project applications must be submitted via email by 11:59pm on Thursday, September 5, 2024 to be considered for this grant cycle.**

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guilfordcountync.gov/our-county/human-services/continuum-of-care/grants

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The Guilford County Continuum of Care (Guilford CoC) coordinates funding efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness.

**Current Year Grant Information**

**[FY 2024-25 HUD Notice of Funding Opportunity \(NOFO\) Local Competition](#)**

The Guilford County Continuum of Care Collaborative Applicant/CoC Lead has released information pertaining to the Fiscal Year 2024-2025 HUD NOFO and Local Competition process. All information is available [here](#). (Updated on 8/27/2024)

Local 556-854 (FY 2024-2025)

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NC 504 2024 NOFO Renewal Applicant Scorecard 8.25.2024.xlsx

1 / 18 100%

Project Information	
Project Name:	
Project Type:	
Agency's Funding Request:	
Funding Recommendation by Reviewer:	
	Housing First Points Awarded
	Project Application Points Awarded
	Total Points

Is this renewal project application requesting to consolidate? (All Project - Renewal Grant Consolidation or Renewal Grant Expansion Screen Q1) 115/100

Is this renewal project application requesting to expand? (All Project - Renewal Grant Consolidation or Renewal Grant Expansion Screen Q1) 115/100 @ 90% = 105 New Project Grant Award

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NC 504 2024 NOFO Renewal Applicant Scorecard 8.25.2024.xlsx

5 / 18 100%

NC 504 Renewal Scorecard - PMF

Source of Information	Allowable Points	Points received	Comments
Length of time between project start date and housing services start	APR Q22 + 30 days = 0 points 11-30 Days = 2.5 points 30 days or less = 5 points		
Ratio % of participants with government-issued/unemployment benefits	APR Q23 +10% = 0 points 75-79% = 1 point 80-89% = 2.5 points 90% or less, ES reported = 5 points		
<b>Project Performance / Participant Services</b>			
Increases in income: Total % of adults who received, gained or increased Q22 income from program entry to annual assessment	APR Q31a1 +20% = 0 points 20-29% = 1 point 30-39% = 2.5 points 40%+ = 5 points		
Increases in income: Total % of adults who received, gained or increased Q22 income from program entry to annual assessment	APR Q31a1 +20% = 0 points 20-29% = 1 point 30-39% = 2.5 points 40%+ = 5 points		
Increases in income: Total % of adults who received, gained or increased Q22 income from program entry to program exit	APR Q31a2 +20% = 0 points 20-29% = 1 point 30-39% = 2.5 points 40%+ = 5 points		
Increases in income: Total % of adults who retained, gained or increased Q22 income from program entry to program exit	APR Q31a2 +20% = 0 points 20-29% = 1 point 30-39% = 2.5 points 40%+ = 5 points		
Increases in number of non-cash benefits: Total % of adults who gained or increased number of non-cash benefits from program entry to follow up / Total Adults (assess, including those with none at entry)	APR Q32b 10% = 0 points 11-19% = 1 point 20-29% = 2.5 points 30-39% = 5 points		
Increases in number of non-cash benefits: Total % of Adults who Gained or Increased income from program entry to program exit / Total Adults (assess, including those with none at entry)	APR Q32b 10% = 0 points 11-19% = 1 point 20-29% = 2.5 points 30-39% = 5 points		
Increases in enrollment in health insurance: Total % of adults who were enrolled in health insurance from program entry to follow up / Total Adults (assess)	APR Q21 10% = 0 points 11-19% = 1 point 20-29% = 2.5 points		

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NC 504 2024 NOFO Renewal Applicant Scorecard 8.25.2024.xlsx

0 / 18 100%

NC 504 Scorecard - RHH

Does the applicant agency participate in the CAC?	NC 504 CAC meeting, subcommittee, and workgroup attendance logs (supplemental information)	Does not participate: 0 Membership pending and/or minimally participates: 25%-50% in meetings, workgroups, etc. -> 2.5 Participates in 51%-75% in meetings, workgroups, etc.: 5 Participates in more than 75% in meetings, workgroups, etc.: 10		
<b>Housing and Supportive Services</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
For all supportive services available to program participants, did the agency indicate who will provide them and how often they will be provided?	Project Application Screen 4A, Question 1 (Chart)	Yes = 3 No = 0		
Did the agency address transportation assistance to program participants to attend mainstream benefits appointments, employment training, or jobs?	Project Application Screen 4A, Question 2	Yes = 3 No = 0		
Does the agency conduct annual follow-up with program participants to ensure mainstream benefits are received and renewed?	Project Application Screen 4A, Question 3	Yes = 3 No = 0		
Do program participants have access to 55/55d technical assistance provided by the project applicant, subrecipient, or partner agency?	Project Application Screen 4A, Question 4	Yes = 3 No = 0		
Has the staff person providing the technical assistance completed SDAR training in the past 24 months?	Project Application Screen 4A, Question 4a	Yes = 3 No = 0		
<b>Housing Type and Location</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the agency specify the housing type/structures including maximum number of units and beds?	Project Application Screen 4B	Yes = 10		

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NC 504 2024 NOFO New Applicant Scorecard 8.25.2024.xlsx

1 / 19 100%

NC 504 2024 NOFO Scorecard

Project Name	
Project Name	
Project Type	
Agency's Funding Request	
Housing Recommendation by Mainstream	
	Housing Total Points Received
	Project Application Points Received
	Total Points
Project Applicant Applications Only (Not Scored/Informational Only)	
Does it provide equipment of a single service animal?	Yes/No
Does this project increase the number of program participants?	Yes/No
Does this project provide additional assistance to those in program participants?	Yes/No
Does this project bring services closer to government needs in safety measures?	Yes/No
New Project Funding Type	
Project Funding Type (Select one)	Select Type (Select "I" to reassign role)
Project Funding Type (Select one)	
How often will the project be reviewed?	

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NC 504 2024 NOFO New Applicant Scorecard 8.25.2024.xlsx

5 / 19 | 100%

NC 504 New Scorecard - PSH

Review Criterion	Source of Information	Max Points	Points Awarded	Comments
<b>Need Agency &amp; Evaluation:</b> Agency reviews itself, shows its strengths and weaknesses, and shows how it has improved its performance. Agency includes a list of its services, programs, and projects, and shows how it has improved its performance. Agency includes a list of its services, programs, and projects, and shows how it has improved its performance.	Agency Self-Report (ASR) and Agency Evaluation Report (AER)	0-10 (10 points)	10	
<b>Agency Equity &amp; Inclusion:</b> Agency shows its commitment to equity and inclusion, and how it has improved its performance. Agency includes a list of its services, programs, and projects, and shows how it has improved its performance.	NC 504 Supplemental Information, Agency Website	0-10 (10 points)	10	
<b>Program Excellence:</b> Agency shows its commitment to program excellence, and how it has improved its performance. Agency includes a list of its services, programs, and projects, and shows how it has improved its performance.	NC 504 Supplemental Information, Agency Website	0-10 (10 points)	10	
<b>Financial Soundness:</b> Agency shows its commitment to financial soundness, and how it has improved its performance. Agency includes a list of its services, programs, and projects, and shows how it has improved its performance.	Agency Self-Report (ASR) and Agency Evaluation Report (AER)	0-10 (10 points)	10	
<b>Inclusion of Persons with Limited English Proficiency:</b> Agency shows its commitment to the inclusion of persons with limited English proficiency, and how it has improved its performance. Agency includes a list of its services, programs, and projects, and shows how it has improved its performance.	Agency Self-Report (ASR) and Agency Evaluation Report (AER)	0-10 (10 points)	10	
<b>Agency Against Human Trafficking:</b> Agency shows its commitment to the prevention and elimination of human trafficking, and how it has improved its performance. Agency includes a list of its services, programs, and projects, and shows how it has improved its performance.	Agency Self-Report (ASR) and Agency Evaluation Report (AER)	0-10 (10 points)	10	
<b>TOTAL ALLOWABLE POINTS</b>		<b>255</b>		
<b>REVIEWER TOTAL</b>			<b>8</b>	


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Membership

**HUD has released the estimated Annual Renewal Demand and Bonus Funding amount and availability. [Posted: Tuesday, August 27, 2024] Click [here](#) for details.**

**[FY 2024-25 Notice of Funding Opportunity \(NOFO\) Competition Information](#)**

NC 504 Collaborative Applicant has released the FY 2024- FY 2024 Local HUD NOFO Competition Notice. [Posted: Friday, August 16, 2024] Click [here](#) for details.

**Continuum of Care**

1203 Maple Street  
Greensboro NC 27405

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**EVENTS**

CoC Monthly Membership Meeting  
09/12/2024 9:30 AM - 11:00 AM

CoC Monthly Membership Meeting  
10/10/2024 9:30 AM - 11:00 AM

[MORE EVENTS](#)

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NC 504 New Scorecard 0.25.2024.xlsx

9 / 19 100%

NC 504 New Scorecard - 1/6/2024

Experiences of Applicant, Subrecipient and Other Parties	Source of Information	Allocable Points	Points Received	Comments
Did the applicant agency describe the applicant's best demonstration of successful experience in performing critical public health and performing the activities proposed in the application?	Project Application Section 26, Question 1	Can Not Address Expectations/Requirements 0; Minutely Addressed Expectations/Requirements 0; Minimally Addressed Expectations/Requirements 1; Fully Addressed Expectations/Requirements 2		
Did the applicant agency describe the applicant's best demonstration of providing expertise in managing financial, legal and other issues under health?	Project Application Section 26, Question 2	Can Not Address Expectations/Requirements 0; Minutely Addressed Expectations/Requirements 0; Minimally Addressed Expectations/Requirements 1; Fully Addressed Expectations/Requirements 2		
Did the applicant agency describe the applicant's best demonstration of successful financial management?	Project Application Section 26, Question 3	Can Not Address Expectations/Requirements 0; Minutely Addressed Expectations/Requirements 0; Minimally Addressed Expectations/Requirements 1; Fully Addressed Expectations/Requirements 2		
Are there any unresolved or litigating or OIG audit findings for any subgrantee (including subgrantee this is a partner)?	Project Application Section 26, Question 4	0-95% + unresolved or litigating or OIG audit findings		
Did the applicant agency describe for successful monitoring or work findings?	Project Application Section 26, Question 5	0-95% + unresolved or litigating or OIG audit findings		
<b>Project Information</b>	<b>Source of Information</b>	<b>Allocable Points</b>	<b>Points Received</b>	<b>Comments</b>
Were funds requested in this state program application received under a state government award (24 CFR 138.42)?	Project Application Section 14, Question 6	0-100% + none; 0-50% + some		
Is your organization, or subrecipient, or other service provider established in the US (24 CFR 138.43)?	Project Application Section 14, Question 7	For non-eligible purposes only		
Did the applicant agency provide a description that addresses the nature of the proposed project?	Project Application Section 16, Question 1	Can Not Address Expectations/Requirements 0; Minutely Addressed Expectations/Requirements 0; Minimally Addressed Expectations/Requirements 1; Fully Addressed Expectations/Requirements 2		
Did the applicant agency provide a timeline for grant implementation for the proposed project of the next year, the year of the execution of the grant agreement?	Project Application Section 16, Question 2	Can Not Address Expectations/Requirements 0; Minutely Addressed Expectations/Requirements 0; Minimally Addressed Expectations/Requirements 1; Fully Addressed Expectations/Requirements 2		
Did the applicant agency identify all personnel they intend	Project Application Section 16, Question 3	For information purposes only		

Supportive Services Only - Coordinated Entry (one application only)

### INFORMATION FROM THE NC 504 COLLABORATIVE APPLICANT

[NC 504 Rating and Ranking Policy](#) | [NC 504 Reallocation Policy](#) | [NC 504 Appeals Policy](#)

The Collaborative Applicant will be hosting office hours regarding the NOFO Application on Thursday, August 22, 2024 at 10:30am via [Microsoft Teams](#). For additional information, please email [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).

The Guilford County CoC Collaborative Applicant Team will be requesting responses for the NC 504 FY 2024- FY 2025 Consolidated NOFO Application from CoC members. Please be on the lookout for an upcoming announcement. Thank you in advance for your partnership and collaboration!

To obtain the recording of and PowerPoint from the Guilford County CoC Grants 101 Workshop, please visit the [CoC Member Portal](#) or email [infoCoC@guilfordcountync.gov](mailto:infoCoC@guilfordcountync.gov).

### Letter of Intent (LOI)

FY 2024-2025 Letter of Intent (LOIs) closed on Monday, August 19, 2024 at 3:00pm.

Five viewers are required for some of the attached documents. They can be downloaded by clicking on the icons below.




Last updated on August 27, 2024

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**GUILFORD COUNTY CONTINUUM OF CARE**  
Working to End Homelessness in Guilford County

**Fiscal Year 2024-2025 HUD NOFO LOCAL COMPETITION**  
(U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT NOTICE OF FUNDING OPPORTUNITY)

*This document is Guilford County CoC's notice of public solicitation for new project applications and renewal project applications in response to the Department of Housing and Urban Development's Notice of Funding Opportunity.*

**Date of Notice**  
August 27, 2024

**Purpose**  
The purpose of this notice is to solicit applications for the Department of Housing and Urban Development's (HUD) annual Notice of Funding Opportunity (NOFO) from non-profits and local units of government who are interested in providing housing-related programs and services to individuals and/or families who are experiencing homelessness in Guilford County, North Carolina. Approved applications will be part of a Consolidated Application for Continuum of Care Homeless Assistance Funding, which will be submitted by the Guilford County Continuum of Care's Collaborative Applicant (NC 504) pursuant to the requirements of the 2024-2025 NOFO.

**Description**  
The CoC Program (24 CFR part 578) is designed to promote community wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, States, and local governments to quickly re-house homeless individuals, families, persons fleeing domestic violence, and youth.

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**Guilford County Continuum of Care**  
Published by Marie Lyons Legrande

HUD has released the estimated Annual Renewal Demand and Bonus Funding amount and availability.  
The NC-504 estimated Annual Renewal Demand (ARD) is: \$2,612,817. Additional funding will be available for an estimated DV Bonus of \$533,695, for an estimated CoC Bonus of \$426,956, and for an estimated annual CoC Planning grant of \$177,096. HUD has not certified the exact funding available for the FY 2024 Competition, currently.

Please visit Guilford CoC Grants website for the HUD Notice of Funding Opportunity (NOFO) Local Competition at: <https://www.guilfordcountync.gov/.../fiscal-year-2024>.

[See insights and ads](#) [Boost post](#)

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**Guilford County Continuum of Care**  
Published by Ryckell Turner

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NC 504 2024 NOFO Renewal Applicant Scorecard 8.25.2024.xlsx

15 / 18 100%

### NC 504 Renewal Scorecard - TH/RRH

For all supportive services available to program participants, did the agency indicate who will provide them and how often they will be provided?	Project Application Screen AA, Question 3 (7/8)	Yes = 5 No = 0		
Did the agency address transportation assistance to program participants to attend mainstream benefits appointments, employment training, etc. (yes)?	Project Application Screen AA, Question 4	Yes = 5 No = 0		
Does the agency conduct annual follow-up with program participants to ensure mainstream benefits are received and renewed?	Project Application Screen AA, Question 5	Yes = 5 No = 0		
Do program participants have access to SH/SSD technical assistance provided by the project applicant, subcontractor, or former agency?	Project Application Screen AA, Question 6	Yes = 5 No = 0		
Has the staff person providing the technical assistance completed SCAM training in the past 24 months?	Project Application Screen AA, Question 6a	Yes = 5 No = 0		
<b>Housing Type and Location</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the applicant agency provide the funding source for all units and beds available (transitional and/or rapid rehousing) for program participants at the selected housing type and location? To ensure capacity to meet the requirement, the CAC program requires that there be at least two applications, one for at least two to every private unit & bed or for unit & bed.	Project Application Screen 4B, Question 3 and 4	Meets CAC program requirements = 10 points Does not meet CAC program requirements = 0 points		
Did the agency specify the housing type/location including maximum number of units and beds available for program participants at the selected housing type?	Project Application Screen 4B, Question 3 and 4	Yes = 5 No = 0		
Applicant agency reported a higher number of units and beds than the number of households (units and persons) listed on screen 5A and screen 5B.	Project Application Screen 4B, Question 2a-2c, 3 and 4 and screen 5B	If Yes = 0 points If No = 5 points		
<b>Project Performance and Utilization</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did the agency submit their previous year's Annual performance report (APR) on time?	Project Application - All Projects Recipient Performance Screen - Question 1	If YES = 5 points If NO = 0 points If YES = 0 points If NO = 5 points		

NC 504 2024 NOFO New Applicant Scorecard 8.25.2024.xlsx

16 / 19 100%

### NC 504 New Scorecard - RRH

<b>Experience of Applicant, Subrecipient(s) and Other Partners</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Did this applicant agency describe the organization's local and regional (if applicable) experience in effectively utilizing federal funds and performing the activities proposed in the application?	Project Application Screen 2B, Question 1	Excellent, Superior Experience/Performance = 3.5 Satisfactory, Adequate Experience/Performance = 3 Fair/Good Experience/Performance = 2 Poor Experience/Performance = 0		
Did the applicant agency describe the organization's local and subcontractor's (if applicable) experience in receiving Federal, State, and/or local grant funds?	Project Application Screen 2B, Question 2	Excellent, Superior Experience/Performance = 3.5 Satisfactory, Adequate Experience/Performance = 3 Fair/Good Experience/Performance = 2 Poor Experience/Performance = 0		
Did the applicant agency describe the organization's local and subcontractor's (if applicable) experience in receiving Federal, State, and/or local grant funds?	Project Application Screen 2B, Question 3	Excellent, Superior Experience/Performance = 3.5 Satisfactory, Adequate Experience/Performance = 3 Fair/Good Experience/Performance = 2 Poor Experience/Performance = 0		
Has the organization completed monitoring at the local level for the project activities and/or other activities?	Project Application Screen 2B, Question 4	If YES = 5 points (all 5 points) If NO = 0 points		
Did the applicant agency describe the proposed monitoring of local level?	Project Application Screen 2B, Question 5	If Proposed Monitoring Question 5, YES, then total Allowable Allowable Experience/Performance = 3.5 If Proposed Monitoring Question 5, NO, then total Allowable Allowable Experience/Performance = 0		
<b>Project Information</b>	<b>Source of Information</b>	<b>Allowable Points</b>	<b>Points Received</b>	<b>Comments</b>
Will funds requested in this new project application be used to fund government services (as defined in 42 CFR 200.103)?	Project Application Screen 5A, Question 6	If YES = 5 points If NO = 0 points		
Is your organization an eligible, qualified, and otherwise eligible for the funding opportunity?	Project Application Screen 5A, Question 7	Yes = 5 points (all 5 points) No = 0 points		
Does the applicant agency indicate the proposed monitoring of local level?	Project Application Screen 5A, Question 8	If YES = 5 points If NO = 0 points		

FY 2024-25 HUD has released the estimated Annual Renewal Demand and Bonus Funding Amounts [Updated 8.27.2024]

Guilford County Continuum of Care <GuilfordCountyCoC@info.guilfordcountync.gov>  
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**GUILFORD COUNTY CONTINUUM OF CARE**

Working to End Homelessness in Guilford County

### Guilford County CoC Announcement

**Notice of Funding Opportunity (NOFO) HUD  
Grant applications are now being accepted!  
(Fiscal Year 2024 - 2025) UPDATED 8.27.2024**

**HUD has released the estimated Annual Renewal  
Demand and Bonus Funding amount and  
availability!**

The Guilford County Continuum of Care Collaborative Applicant CoC Lead has released the [FY 2024-2025 HUD NOFO Local Competition Notice 8.27.2024](#). Eligible applicants seeking to apply can find all application information and additional documents as they become available here:

[FY 2024-2025 HUD NOFO Local Competition Grants Page](#)

**Application deadline is Thursday, September 5, 2024 by 11:59pm EST**

#### Funding Amount and Availability

The NC-504 estimated Annual Renewal Demand (ARD) is: **\$2,612,817**. Additional funding will be available for an estimated **DV Bonus of \$533,695**, for an estimated **CoC Bonus of \$426,966**, and for an estimated annual CoC Planning grant of \$177,896. HUD has not certified the exact funding available for the FY 2024 Competition currently. For further information and updates, please see the HUD Exchange website at: [https://www.hud.gov/program\\_offices/ce/mi\\_funding/cooc/competition](https://www.hud.gov/program_offices/ce/mi_funding/cooc/competition)

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