



DRAFT

2025-2026 PHA PLAN

Housing Authority of the City of Raleigh

Purpose

This Plan provides a ready source of information on RHA's policies, rules, and requirements about its operations, programs, and services as well as informs on its mission, goals and objectives for serving its families.

www.rhaonline.com



Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
--	---	---

Contents

I.	Streamlined Annual PHA Plan (High Performer PHAs)	2
II.	Exhibit 1	9
	B.1 Revision of Existing PHA Plan Elements	9
	Statement of Housing Needs	9
	Demographics	10
	Strategy for Addressing Housing Needs	10
	Deconcentration Efforts	11
	Homeownership Program	11
	Safety and Crime Prevention under the Violence Against Women’s Act	12
	Significant Amendment/Modification	12
	B.2 New Activities	14
	Strategic Plan	14
	Strategic Communications and Engagement Plan	14
	Demolition and/or Disposition	15
	Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD	15
	Project-Based Vouchers	16
	Family Self-Sufficiency Program (FSS)	16
	Grant Programs	17
	B.3 Progress Report on Items Continuing from Previous Plans	18
	Agency Mission	18
	Operations	18
	Partnerships	19
	Growth and Training	19
	B.4 Capital Improvements	20
III.	Public comments received, RAB Comments and Challenged Elements	21

Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
--	---	---

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

Applicability. The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

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

A. PHA Information.					
A.1	PHA Name: <u>Housing Authority of the City of Raleigh</u> PHA Code: <u>NC-002</u> PHA Type: <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>04/2025</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>1,248</u> Number of Housing Choice Vouchers (HCVs) <u>3,958</u> Total Combined <u>5,206</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>A public comment period for the Annual PHA Plan and Capital Fund Plans will begin on October 15, 2024 and end on November 29, 2024. RHA will hold public meetings and publish notices in local newspapers, on RHA's website, and directly to residents via mailbox postings, flyers, newsletters and emails.</p> <p>During the public comment period, RHA will draft copies of the Annual PHA Plan and Capital Fund Plans to the public in multiple ways. Hard copies will be available for review at RHA's Administrative office located at 900 Haynes Street. Additionally, drafts will be posted to the RHA website www.rhaonline.com and can be provided by email upon request.</p>				
<input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) <u>N/A</u>					
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program
					PH
					HCV

Lead PHA:					

B. Plan Elements

B.1 Revision of Existing PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA Plan** submission?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs.
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Homeownership Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Substantial Deviation.
- Significant Amendment/Modification RHA defines a significant amendment/modification as a change that affects a majority of program participants, or a change that cause large sections of the current plan to be: 1) out of date; 2) inaccurate; or 3) result in a change in the way that RHA delivers its services. Significant amendments/modifications are cause to amend or modify the plan during the program year. If the change is only a short-term change of less than one year, then it is not considered significant.

(b) If the PHA answered yes for any element, describe the revisions for each element below: *RHA’s Admissions and Continued Occupancy Policy* and the *Administrative Plan* are reviewed annually. These policies govern eligibility, selection criteria, program admissions and more. All revisions are provided to RHA’s Board of Commissioners. Changes to both policies are provided to HUD with the annual and 5-year PHA Plan submissions.

RHA intends to apply funding flexibility per HUD’s guidance in PIH Notice 2018-3 to use up to 20% of the Operating Subsidy appropriated to the agency for Capital Fund activities.

(c) The PHA must submit its Deconcentration Policy for Field Office Review. *N/A* – RHA only has one property that is subject to the Deconcentration Rule, Heritage Park. No comparison can be made at this time.

See Exhibit 1 for a more detailed report on revisions of existing PHA Plan elements.

B.2 New Activities.

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

Y N

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Conversion of Public Housing to Tenant Based Assistance.
- Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
- Project Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

	<p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p>See Exhibit 1 for a more detailed report on new activities.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>The Raleigh Housing Authority continues to seek and develop strategies to reduce the cost of operating Public Housing and administering the Housing Choice Voucher program. RHA continues to house families in Public Housing as units become vacant. RHA strives for high leasing and utilization rates under the Housing Choice Voucher program. RHA continues to pursue non-federal sources for funding affordable housing and services. All agency initiatives are evaluated to determine their effectiveness and to determine whether the program should be expanded, maintained or eliminated.</p> <p>See Exhibit 1 for a more detailed progress report.</p>
B.4.	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>Capital Fund 5 Year Action Plan is in the process of being completed for submission to HUD.</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, please describe: Audit report and findings are in process and will be provided to HUD.</p>
C.	Other Document and/or Certification Requirements.
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan? RHA will hold a Resident Advisory Board meeting on the proposed updates. Staff will present the proposed PHA Plans to residents. A list of challenged items and topics discussed will be presented to HUD with the final plan submittals.</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form 50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	

	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan? Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements. Any elements challenged by the public will be provided in the final draft of this Plan after the closing of the comment period.</p>					
D.	Affirmatively Furthering Fair Housing (AFFH).					
D.1	<p>Affirmatively Furthering Fair Housing.</p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <td style="padding: 5px;">Fair Housing Goal:</td> </tr> <tr style="background-color: #f0f0f0;"> <td style="padding: 5px;"> <p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p>RHA Goal: Deconcentrate voucher holder units and foster affordable housing opportunities in higher opportunity areas.</p> <p>Action: Continue providing mobility counseling for all voucher recipients in order to encourage voucher holders to look for units outside of areas of high poverty or minority concentration.</p> <p>Action: Continue to seek landlord participation in the voucher program from property owners with affordable rental units in higher opportunity areas.</p> </td> </tr> </table> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <td style="padding: 5px;">Fair Housing Goal:</td> </tr> <tr style="background-color: #f0f0f0;"> <td style="padding: 5px;"> <p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p>RHA Goal: Ensure that persons with limited English proficiency can access the services and programs offered by the RHA.</p> <p>Action: Annually, update the Language Access Plan and data with current information to reflect current demographic trends among persons with limited English proficiency.</p> </td> </tr> </table> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <td style="padding: 5px;">Fair Housing Goal:</td> </tr> </table>	Fair Housing Goal:	<p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p>RHA Goal: Deconcentrate voucher holder units and foster affordable housing opportunities in higher opportunity areas.</p> <p>Action: Continue providing mobility counseling for all voucher recipients in order to encourage voucher holders to look for units outside of areas of high poverty or minority concentration.</p> <p>Action: Continue to seek landlord participation in the voucher program from property owners with affordable rental units in higher opportunity areas.</p>	Fair Housing Goal:	<p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p>RHA Goal: Ensure that persons with limited English proficiency can access the services and programs offered by the RHA.</p> <p>Action: Annually, update the Language Access Plan and data with current information to reflect current demographic trends among persons with limited English proficiency.</p>	Fair Housing Goal:
Fair Housing Goal:						
<p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p>RHA Goal: Deconcentrate voucher holder units and foster affordable housing opportunities in higher opportunity areas.</p> <p>Action: Continue providing mobility counseling for all voucher recipients in order to encourage voucher holders to look for units outside of areas of high poverty or minority concentration.</p> <p>Action: Continue to seek landlord participation in the voucher program from property owners with affordable rental units in higher opportunity areas.</p>						
Fair Housing Goal:						
<p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p>RHA Goal: Ensure that persons with limited English proficiency can access the services and programs offered by the RHA.</p> <p>Action: Annually, update the Language Access Plan and data with current information to reflect current demographic trends among persons with limited English proficiency.</p>						
Fair Housing Goal:						

Describe fair housing strategies and actions to achieve the goal

Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

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

A.1 Include the full **PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type,** and the **Availability of Information,** specific location(s) of all information relevant to the public hearing and proposed PHA Plan. ([24 CFR §903.23\(4\)\(e\)](#))

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

B. Plan Elements.

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

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a).

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

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. [24 CFR §903.7\(b\)](#) Describe the PHA’s procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. [24 CFR §903.7\(b\)](#) A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. ([24 CFR §903.7\(b\)](#)) Describe the unit assignment policies for public housing. [24 CFR §903.7\(b\)](#)

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

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

Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. ([24 CFR §903.7\(k\)](#) and [24 CFR §903.12\(b\)](#)).

Safety and Crime Prevention (VAWA). A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. ([24 CFR §903.7\(m\)\(5\)](#))

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

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#))

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

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

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

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

HOPE VI. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)

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

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

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. ([24 CFR §903.7\(j\)](#))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. ([24 CFR §983.57\(b\)\(1\)](#)) If using project-based vouchers, provide the projected number of project-based units and general locations and describe how project-basing would be consistent with the PHA Plan.

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

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

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

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

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

C. Other Document and/or Certification Requirements

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

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#)).

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

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.

The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: “To implement goals and priorities in an AFH, strategies and actions shall be included in program participants’ ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing ...” Use the chart provided to specify each fair housing goal from the PHA’s AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 7.02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

II. EXHIBIT 1

The mission of the Raleigh Housing Authority is to provide safe, quality, affordable housing to low and moderate-income families in the greater Raleigh community, and to promote personal responsibility and self-sufficiency of residents while maintaining the fiscal integrity of the agency.

B.1 REVISION OF EXISTING PHA PLAN ELEMENTS

Statement of Housing Needs

In order to help identify local housing needs, the Raleigh Housing Authority utilizes information available to the Agency, including that provided by the Consolidated Plan, information provided by HUD, and the regional Analysis of Impediments to Fair Housing. The items and goals below have been identified using the data available.

According to the Consolidated Plan for the City of Raleigh, the primary housing barriers for Raleigh's low- and moderate-income residents are:

- Finding rental housing that is affordable, whether subsidized or naturally occurring.
- Severe rental cost-burdens for very-low (50% AMI) and extremely-low (30% AMI) income households.
- Once affordable areas being redeveloped into higher income neighborhoods, market rate or luxury apartments.
- Lack of authority to require a set aside for affordable housing in new developments impedes the supply of affordable rental units within Raleigh.

In 2020, a regional Analysis of Impediments to Fair Housing was conducted by the City of Raleigh, Wake County, Town of Cary, Raleigh Housing Authority, and the Housing Authority of the County of Wake to further analyze fair housing and make recommendations for each consortia member. The following is a summary of applicable goals identified for the region and for RHA:

- Continue providing mobility counseling, deconcentrate HCV holder units and foster affordable housing opportunities in higher opportunity areas.
- Ensure that persons with limited English proficiency can access the services and programs offered by the RHA.
- Remove barriers to accessing community assets for members of the protected classes.
- Advocate for public transit systems to connect lower income neighborhoods with major employment centers.
- Increase fair housing education, outreach and enforcement.

RHA is participating in the consortium for the next Analysis of Impediments being prepared for the city of Raleigh, Wake County, and town of Cary areas. The RFP is underway for 2025 and bids are being scored.

Demographics

Demographics below are from the beginning of the current PHA Plan year. Demographics will be updated during review process to provide HUD the most accurate information at the time of required submission.

Public Housing Residents		Housing Choice Voucher Residents	
Total number of residents	2,342	Total number of residents	8,885
Number of minors	902	Number of minors	3,371
Residents aged 18-64	1,076	Residents aged 18-64	4,221
Residents aged 65+	364	Residents aged 65+	1,293
Resident Demographics			
African American	2,063	African American	7,553
White	145	White	1,096
Asian	14	Asian	54
Other Race	49	Other Race	73
Hispanic	91	Hispanic	390
Not Hispanic	2,252	Not Hispanic	8,495
Disabled residents	401	Disabled residents	2,036
Resident Household Income Levels			
0-30% AMI	896	0-30% AMI	3,519
30-50% AMI	216	30-50% AMI	594
50-80% AMI	88	50-80% AMI	62
Over 80% AMI	12	Over 80% AMI	4

Strategy for Addressing Housing Needs

In order to help address the current housing needs of low- to moderate-income renters in Raleigh, RHA will utilize some or all of the strategies below:

- Utilize whatever tools are available to increase housing choice under the voucher and other programs.
- Assist with expanding opportunities into higher opportunity areas without steering for families.
- Remain committed to protecting and increasing the affordable housing within the City of Raleigh. This may include purchases, redevelopment, demolition and disposition projects.
- The development of affordable housing should be directed to high opportunity areas, when possible.
- Continue to review policies and procedures that assist families with limited English proficiency.
- Advertise programs and services in areas with higher concentrations of English-limited families and individuals.
- Advertise jobs and hire multi-lingual staff members.

- Continue partnering with agencies, individuals and businesses to develop strategic goals and solutions to the affordable housing shortage in Raleigh.
- Continue offering local preferences to applicants including those referred through the Continuum of Care's Coordinated Access System.
- Advocate for transportation services that provide better access to low-income families.
- Increase stakeholder awareness of fair housing to affirmatively further fair housing.
- Assist with fair housing training and opportunities for non-governmental entities that are not familiar with fair housing laws.
- Implement software that will reduce applicant and resident burden to receiving housing assistance.
- Provide a Language Assistance Plan that implements and outlines language assistance to all applicants and residents. Last revised during current PHA Plan year.
- RHA will continue to issue Bonds to advance the mission of the agency and acquire, build, or cause the development of mixed income, deeply affordable, LIHTC, workforce housing, market rate, and PBV communities throughout Wake County.

Deconcentration Efforts

- No comparisons can be made as RHA only has one property that is subject to the Deconcentration Rule - Heritage Park.
- While RHA does not have multiple communities that are subject to 24 CFR §903, it still actively encourages income mixing as promoted by HUD.
- RHA provides for deconcentration of poverty and encourages income mixing by bringing higher-income families into lower-income communities and vice versa.
- In partnership with various supportive service providers, RHA offers services and promotes programs that help residents achieve self-sufficiency including financial basics, increasing credits scores, and homeownership trainings.
- RHA continues to offer working preferences in both the public housing and section 8 programs.
- RHA encourages families receiving tenant-based vouchers to consider residing in neighborhoods that provide access to greater opportunities for family members.

Homeownership Program

- RHA will consider how it may help its residents work towards participation in an affordable housing Homeownership Program.
- A homeownership program may allow residents to work towards higher levels of self-sufficiency and economic stability.
- RHA may work with local partners including DHIC, Habitat for Humanity and the Raleigh Area Land Trust to explore and expand homeownership options.

- RHA may work with its Scattered Sites residents to determine if residents have an interest in purchasing their home from RHA directly or from another affordable housing entity.
- RHA encourages its residents to participate in any affordable homeownership program available to them as RHA does not offer a HUD sponsored homeownership program.

Safety and Crime Prevention under the Violence Against Women's Act

- RHA will continue complying with all requirements associated with the federal law, Violence Against Women Act (VAWA).
- RHA adheres to this law in the development of policy and procedures, including the *Admissions and Continued Occupancy Policy* and the *Administrative Plan*.
- Anyone eligible for public housing or for section 8 will not be refused admittance or terminated from the program solely because they are a victim of domestic violence, dating violence, sexual assault or stalking.
- RHA posts copies of resident and applicant rights in all Offices and on the Agency website.
- Notification of applicants' and residents' rights are provided at different times including when housing is denied, at move-in orientation, when RHA is notified of incidents of domestic violence and during notification of lease or housing assistance termination.
- An Emergency Transfer policy is in place for residents seeking transfers due to domestic violence, dating violence, sexual assault and stalking. This policy is posted throughout Agency offices, is on the Agency website and is provided upon request.
- RHA provides training on domestic violence and VAWA to its staff. RHA recognizes that VAWA does not replace any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault or stalking.

Significant Amendment/Modification

RHA defines a significant amendment/modification as a change that affects a majority of program participants, or a change that cause large sections of the current plan to be: 1) out of date; 2) inaccurate; or 3) result in a change in the way that RHA delivers its services. Significant amendments/modifications are cause to amend or modify the plan during the program year. Short-term changes of less than one year are not considered significant.

Amendments to the previous PHA Plan may include:

- Annual revisions to both the public housing *Admission and Continued Occupancy Policy* and the section 8 *Administrative Plan*.
- Updates to applicant screening criteria as it relates to occupancy and housing preferences.
- Updates to RHA's domestic violence policy and emergency transfer policy to be consistent with HUD regulations.
- A change that materially revises the agency's mission, goals, or objectives.

- Additions of a Capital Fund project or non-emergency work items that are not in the current Annual or 5-year PHA Plan in an amount equal to or greater than \$1,000,000.
- Material changes in regard to demolition, disposition, designation, or conversion activities not in the current Annual or 5-year PHA Action Plan.
- Updates required by HUD or other federal agencies including finalization of HOTMA updates.
- Any other event or activity that the Authority's Board of Commissioners determines to be a significant amendment to the approved 5-Year Plan or Annual Plan

RHA will follow all requirements listed in 24 CFR when significantly amending or modifying any PHA policy, rule, regulation or other aspect of the Plan.

DRAFT

B.2 NEW ACTIVITIES

Strategic Plan

Raleigh Housing Authority's Strategic Plan lays out the organization's strategy for improving the lives of employees and our customers, increasing affordable housing development, and reaching our goals for equitable, inclusive communities. The five strategic goals put forth in the plan present our vision of what RHA hopes to accomplish, our objectives for how we will reach those goals, and the strategies for achieving success. The five strategic goals are:

- Vibrant Communities
- Thriving Customers
- Organizational Health
- Effective Partnerships
- Racial and Social Equity

Objectives for year 1:

- Develop access to and acquire the financial tools necessary for success.
- Obtain and maintain an investment-grade credit rating for issuing and selling RHA municipal bonds.
- Expand RHA housing stock through new construction, especially affordable housing.
- Develop appropriate relocation strategies and plans.
- RHA will leverage technology to empower our customers to access information and educational materials.
- Increase employee engagement as a key determinant of overall organizational health.
- Build strong relationships with elected officials and City and County staff and other government partners to maximize the availability of affordable housing.
- Collaborate with other owners of affordable housing to acquire properties with expiring affordability requirements.

Strategic Communications and Engagement Plan

The purpose of this engagement plan is to provide a framework for communications efforts of RHA to implement its mission. This includes: providing high quality services to our residents and program participants; increasing and improving critical housing resources in our city; and developing new and renovating existing housing inventory. Through our ongoing efforts, RHA hopes to increase transparency regarding the use of public funds and share progress towards our goals.

The Strategic Communications and Engagement Plan speaks specifically to:

- Why Communicate
- What to Communicate

- Who to Communicate With
- How and Where to Communicate
- Communication Frequency

Demolition and/or Disposition

- RHA is strategizing future plans for protecting and increasing affordable housing within the City of Raleigh. This approach may include purchases, redevelopment, demolition and/or disposition. The HUD approval process will be followed for any of these activities as required.
- RHA's Real Estate Investment Committee continues to help advise demolition and disposition activities.
- Redevelopment efforts may seek to utilize various funding sources including RAD, Section 18, tenant protection vouchers, low-income housing tax credits, grants and more.
- RHA has submitted a Section 18 application for the demolition and redevelopment of Heritage Park (NC002000012). This community is comprised of 122 public housing units constructed in the 1970's.
 - Brinshore Development and Torti Gallas and Partners have been brought on-board as co-developers of this project.
 - Heritage Park contains thirty 1-bedroom, forty-four 2-bedroom, twenty-eight 3-bedroom, twelve 4-bedroom, and eight 5-bedroom units.
 - The property is currently about 50% leased as RHA has been offering to relocate families voluntarily since May 2024.
- RHA may seek HUD approval to sell some of its single-family public housing units (NC002000038).
 - RHA's single-family homes consist of two 2-bedroom, one hundred and two 3-bedroom, and four 4-bedroom homes scattered throughout Wake County.
- RHA may actively move towards the demolition, disposition or redevelopment of Glenwood Towers (NC002000006). This high-rise community was constructed in the 1970's.
 - Glenwood Towers contains one hundred and sixty-seven 0-bedroom, one hundred and nineteen 1-bedroom, and one 2-bedroom units in downtown Raleigh.
 - Glenwood Towers is part of RHA's approved Designated Housing Plan.
- RHA will apply for the maximum amount of allowed Tenant Protection Vouchers in conjunction with any demolition/disposition activities. TPV submittals may be submitted early if deemed necessary.
- RHA may acquire replacement public housing in other communities up to its Faircloth Limit.

Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD

- HUD continues to encourage housing authorities to convert public housing units under RAD to voucher-based funding. RHA has successfully converted four properties under the RAD program to date.
- RHA may submit new applications to the RAD program in order to reposition more of its public housing stock.

- RHA may seek to reposition its current housing stock using a variety of awards including a Faircloth-to-RAD application.

Project-Based Vouchers

- RHA implements project-based voucher program to enhance the number of affordable housing rental units developed within our city.
- The *Administrative Plan* includes information on the program including acceptance and scoring PBV owner proposals, selection of PBV program participants, and more.
- Project-based vouchers may make up to 20 percent of RHA’s authorized units for project-based assistance. An additional 10 percent of authorized units (30%) may be project-based according to HUD regulations and requirements.
- RHA has issued Request for Proposals for project-based vouchers and additional RFPs may be issued throughout the fiscal year.
- HUD has approved the following number of units as project-based:

Program Voucher Count	Revised Baseline Percentage	Percentage Cap Limit	Units Previously Approved	Units Proposed	Total Unit Count
3,958	20% of Baseline	791	0	400	400
3,958	10% of Baseline	395	0	300	300

Family Self-Sufficiency Program (FSS)

- RHA may implement an FSS program that encourages communities to develop local strategies to help resident families obtain employment that will lead to economic independence and self-sufficiency.
- Staffing may be increased if an FSS program is implemented using Housing Choice Voucher Administrative Fees or other fees as needed.
- FSS beneficiaries are anticipated to be RHA residents who have been or are in the process of relocating due to RHA lead redevelopment, demolition or disposition projects.
- RHA may self-fund an FSS Program for up to three years with the hope of obtaining an FSS grant within that time.
- FSS program services may include, but are not limited to:
 - Child Care
 - Transportation
 - Education
 - Job Training & Employment Counseling
 - Substance/Alcohol Abuse Treatment

Grant Programs

RHA regularly reviews current grant opportunities and may apply for these funds and programs. Additional grant programs may be applied to throughout the year.

- RHA may apply for a federal grant that would have added Mainstream Vouchers to our housing portfolio.
- Choice Neighborhoods may be sought in relation to development activities.
- RHA may seek to implement a Family Self-Sufficiency (FSS) program under HUD's purview. Grant applications for FSS funds may be pursued by the agency.
- Grant programs that increase staffing capabilities including the number of Resident Services Coordinators may be sought in order to expand clientele offerings.

B.3 PROGRESS REPORT ON ITEMS CONTINUING FROM PREVIOUS PLANS

In working towards items previously identified as areas of needs/concentration, RHA:

Agency Mission

- Remains committed to protecting and increasing affordable housing within Raleigh.
- Intends to use whatever tools are available to increase housing choice options in the voucher program.
- Aims to bolster resident's life skills, job training programs, credit score ratings, homeownership counseling and self-sufficiency.

Operations

- Maintains a satisfactory vacancy rate while making necessary adjustments for modernization.
- Maintains operational standards as a distinguished high performing public housing agency.
- Maintains the agency website with contact information, pertinent documents and emergency announcements.
- Improves communications with residents, housing applicants, landlords and other stakeholders.
- Continues to utilize technology including online applications, electronic reporting, virtual meetings, online rent payments and more.
- Reviews over-income families according to the Housing Opportunity Through Modernization Act of 2016 (HOTMA).
- Provides timely updates of all applicable HOTMA regulations as determined by HUD.
- Routinely evaluates RHA wait lists to determine whether opening/closing is needed.
- Continues to explore and consider the Moving to Work program to determine whether applying would be advantageous to RHA and its residents.
- Offers waiting list preferences and special admissions to structure applicant assignments.
- Maintains the fiscal integrity of the Agency.
- Supports residents' education, rights, and fosters a positive approach to engagement and feedback.
- Promotes rent readiness guidelines to housing applicants.
- Modernizes public housing units as needed and as funding allows.
- Maintains surveillance cameras and adds additional cameras/upgrades.
- Complies with all HUD regulations and updates to fair housing, rent reasonableness, utility allowances, fair market rents, etc.
- Receives designated housing status for Glenwood Towers and Carriage House communities as housing for elderly and/or disabled families. RHA's Designated Housing Plan has been approved by HUD to be effective through May 2028.

Development	0-Bdrm	1-Bdrm	Total Designated Units
Glenwood Towers	167	119	286
Carriage House	87	12	99
Total	254	131	385

Partnerships

- Continues to work with the community as a partner to agencies, individuals and businesses to develop goals and solutions to the affordable housing shortage in Raleigh.
- Partners with a wide spectrum of non-profit and other housing developers to maximize the availability of affordable housing.
- Increases customers' access to partners' services to enhance their potential to flourish.
- Builds strong relationships with elected officials and City and County staff and other government partners to maximize the availability of affordable housing.
- Collaborates with the Raleigh Police and Fire Departments within and around communities.
- Continues to strengthen its working relationship with non-profits and local educational institutions.
- Utilizes the Housing Choice Voucher Program to create partnerships with landlords and owners with assets in communities of high opportunity.

Growth and Training

- Provides education sexual harassment in housing to all employees, applicants and housing participants.
- Provides training sessions to RHA staff on fair housing training, domestic violence and more.
- Encourages staff to access Aspire training modules within Yardi for personal growth and development.
- Evaluates technological offerings and leverage state-of-the-art information systems increase efficiency, effectiveness, and quality customer service.
- Ensures that all staff understand the organization's core goals and the strategies to achieve them.
- Continues to maximize organizational health to ensure RHA's ability to thrive through challenges.
- Fosters a competitive compensation and benefits system to attract and retain a qualified workforce.
- Complies with the Davis-Bacon Act's Maintenance Wage Determination rates.

B.4 CAPITAL IMPROVEMENTS

RHA receives HUD funding through the Capital Fund Program (CFP) to assist with modernization, development, and renovation of public housing units community-wide, and as a way to ensure long-term physical and social viability of the communities. RHA applies funding flexibility per HUD's guidance in PIH Notice 2018-3 to use up to 20% of the Operating Subsidy appropriated to the agency for Capital Fund activities.

The following work items are either underway or recently completed:

- Installation of security cameras throughout sites as needed.
- Interior and exterior modernization activities in vacant units as needed. Extensive modernization will require units to be vacant.
- Asbestos abatement portfolio wide during vacancy turns as needed.
- Installation of new luxury vinyl-plank flooring during vacancy turns.
- Installation of smart burners and other safety equipment identified as necessary during vacancy turns.
- Modernization of units to address safety items or concerns at vacancy turns that would prohibit immediate re-occupancy of unit.
- Upgrading exterior lighting at site as a safety precaution.
- Testing of lead based paint at all pre-1978 multifamily developments as needed.
- Testing of radon on first floor units at vacancy turn and mitigation system installation as needed.
- Redevelopment, demolition and disposition of properties is being reviewed and analyzed to address growing affordable housing needs in our jurisdiction. Capital Funds will be utilized during this process.

III. PUBLIC COMMENTS RECEIVED, RAB COMMENTS AND CHALLENGED ELEMENTS

Section with comments received, meeting feedback, and challenged elements will be compiled as they are received. Final PHA Plan will include an outline of the information and RHA's response.

DRAFT