

Annual PHA Plan (Standard PHAs and Troubled PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, 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. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

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 of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 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 exceeds 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	<p>PHA Name: <u>SPRINGFIELD METROPOLITAN HOUSING AUTHORITY</u> PHA Code: <u>OH 021</u></p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2021</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>789</u> Number of Housing Choice Vouchers (HCVs) <u>1,299</u></p> <p>Total Combined Units/Vouchers <u>2,088</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. 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> <ul style="list-style-type: none"> • Copies of the Revised Annual Plan and related documents available upon request at SMHA Main Administrative Office located at 101 W. High Street, Springfield, OH and each Asset Management Project (AMP) Office located at 4726 Security Drive, 1707 E. High St., 315 S. Burnett Rd, and 220 Montgomery Ave., 1900 Huron Ave. in Springfield, OH. <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	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:																							
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		PH	HCV																														
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B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

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

Y N

Statement of Housing Needs and Strategy for Addressing Housing Needs

- Housing needs in the jurisdiction of SMHA as based on the most recent Consolidated Plan and SOCDS CHAS Data have not changed. However data concerning housing needs on the waiting lists changes on a frequent basis. Waiting list tables have been prepared and include an analysis by total number, income, disability, race, ethnicity, etc.

Housing Needs in the jurisdiction, waiting lists and SMHA's strategy for addressing housing needs are included as Exhibit 1 on pages 11-15

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.

DE concentration

- This year's Deconcentration Analysis was conducted in May 2019. The results are described in Attachment A.

Other Policies that Govern Eligibility, Selection, and Admissions:

- SMHA will update the ACOP and Section 8 Administrative Plan to be in compliance with PIH Notices that have been issued.
- **Over-Income Families** – SMHA will comply with the Housing Opportunity Through Modernization Act of 2016 (HOTMA) which was signed into law on July 29, 2016. Among its many provisions was an income limit to who can live in public housing (not HCV or other federal low-income housing programs). Two years later, HUD published a Notice in the Federal Register on July 26, 2018 to inform the public and PHAs on how it is setting the limit and to start the process for tracking over-income families. PIH Notice 2019-11 (**Subject: Final Implementation of Public Housing Over-Income Limit under the Housing Opportunity Through Modernization Act of 2016 (HOTMA)**) was issued on May 3, 2019.

The law requires that after a family's adjusted income has exceeded 120 percent of the area median income (AMI) (or a different limitation established by the Secretary) for two consecutive years, a PHA must have the family be subject to either termination or be charged a higher rent based on the PHA's policies. The monthly rent would be equal to the greater of (1) the current Fair Market Rent (FMR for the PHA's area); or (2) the amount of monthly subsidy for the unit including amounts from the operating and capital fund, as determined by regulations. the family will be subject to either a higher rent (as determined on a HUD formula) or termination. SMHA will determine which of these two (2) options to implement upon issuance of upcoming HUD publication(s)

SMHA is tracking over-income families at every annual reexamination and all interim reexaminations for increases in income.

Financial Resources.

- Continuously changing. The financial resources table has been completed and is a Supporting Document Available for Review.

Rent Determination.

Operation and Management. SMHA wants to change its fiscal year to a calendar year from an October through September fiscal year.

Grievance Procedures. SMHA may make possible changes to its hearing policy and procedures of both housing programs.

Homeownership Programs.

- **Section 8 Homeownership Program** – SMHA may administer a Section 8 Homeownership Program.

- **Public Housing Homeownership Program** – SMHA may explore the possibility and feasibility of implementing a public housing homeownership program in the upcoming fiscal year.

Community Service and Self-Sufficiency Programs.

- SMHA coordinates and provides a combined Family Self-Sufficiency program for the Section 8 HCV and Public Housing. SMHA coordinates Community Supportive Services (CSS) specifically to Lincoln Park (LP) and Sherman Murray multifamily site residents such as referrals and assistance to promote and attain self-sufficiency. Other programs relating to services and amenities provided or offered to all LIPH and HCV residents of SMHA include: 1) Project Choice (PC) afterschool and summer programming for youth ages 5-17 years of age. This program is offered through a local Mental Health & Recovery Board (MHRB) grant; 2) Neighborhood Networks Center (NNC) at Lincoln Park (LP) which offers a variety of services to promote and achieve self-sufficiency to include but not limited to, a computer access lab, self-improvement/awareness classes/workshops in credit & budgeting, educational and employment services such as resume writing, job applications, job searches, etc. SMHA's Asset Managers are responsible for enforcing the required 8 hours of community service and any income changes resulting from welfare program requirements.

Safety and Crime Prevention.

- An agreement between SMHA and Springfield Sheriff's Department has been executed. The local law enforcement agencies will provide crime data to SMHA staff for analysis and for action. Plans to upgrade existing security cameras at one development projected in was completed in FYE 9/30/2020.
- SMHA is in compliance with the Violence Against Women Reauthorization Act of 2013: Implementation in HUD Housing Programs, Final Rule, published in the Federal Register on November 16, 2016, and PIH Notice 2017-8, Subject: Violence Against Women Reauthorization Act of 2013 Guidance, issued May 19, 2017. SMHA's statement on the Violence Against Women Act (VAWA) is included as Attachment B.

Pet Policy. SMHA may change its pet policy.

Asset Management. **SMHA is in full compliance with Asset Management requirements**

Substantial Deviation.

The following will be considered SMHA's "substantial deviation" and "significant amendment" to the PHA Plan. Any change with regard to demolition or disposition, designation, homeownership programs or conversions activities. Any significant amendment or substantial deviation/modification to PHA Plan is subject to the same requirements as the original PHA Plan (including timeframes).

Proposed demolition, disposition, homeownership, RAD conversion, Capital Fund Financing, development, or mixed finance proposals are considered to be significant amendments to the CFP Five Year Action Plan (This statement has been added as a result of the Capital Fund Program Final Rule, which was effective November 2013)

Significant Amendment/Modification

See Definition above

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

- For ease of reference SMHA's changes have been described within each Annual Plan Element in letter B.1 (a) above.

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

- SMHA's Deconcentration Policy as excerpted from the ACOP is included as Exhibit 2 on Pages 12-9 and 12-10

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. **SMHA is presently a prime partner with and in full support of the City of Springfield and Springfield Promise Neighborhood's submission of a previous Choice Neighborhoods grant application for targeted areas in Springfield, Ohio. Sherman/Murray is the targeted public housing development identified in the grant application. SMHA may explore the feasibility of applying for other Choice Neighborhoods Program opportunities in the upcoming year. SMHA will continue to explore this option.**

Mixed Finance Modernization or Development.

- **If appropriate opportunities are presented, SMHA may become involved with Mixed Finance. RHF funds may be used as part of a Mixed-Finance project.**

Demolition and/or Disposition.

- **SMHA plans to prepare and submit a new disposition application for HUD approval on (TBD) for the following public housing properties during FY2019: 1) Demolition application: Part of Hugh-Taylor scattered site with development number OH021000025 (1 unit affected = 3 bdrms) unit ID 011788 at 124 E. Rose Street. SMHA may have the 124 E. Rose Street unit disposed of by 9/30/2021, contingent upon HUD approving PHA's disposition application.**

• Designated Housing for Elderly and/or Disabled Families.

- **A designated housing plan for occupancy only by elderly and near-elderly was prepared, approved by the SMHA Board, was submitted to HUD in June 2016, and approved by HUD in August 2016. More detailed information follows for each location as required. 1) Grayhill Homes Apartments – 220 Montgomery, OH021000023, part of the development-105 units affected. 2) Henry-Sherman Homes aka Henry Homes Apartments, OH021000024, part of the development-50 units affected. 3) Hugh Taylor Apartments, OH021000025, part of the development -100 units affected.**

• **SMHA will submit for extension of the DHP.**

- **SMHA may consider amending the DHP. Demographics of SMHA and the local jurisdiction will be used in making this determination.**

Conversion of Public Housing to Tenant-Based Assistance. – **No current plans**

Conversion of Public Housing to Project-Based Assistance under RAD.

- **SMHA will be examining the possibility of converting its' 100% public housing units and public housing/mixed finance units to RAD. If determined feasible, and pursuant to a CPNA, the Housing Authority will submit an application compliant with all required HUD regulations.**

Occupancy by Over-Income Families. **Not Applicable to SMHA**

Occupancy by Police Officers. **Not Applicable to SMHA**

Non-Smoking Policies.

- On December 5, 2016, HUD published a final rule in the Federal Register for each Public Housing Agency administering low-income, conventional public housing to initiate a HUD-mandated smoke-free policy. The effective date of the Rule is February 3, 2017, and it provides an 18-month implementation period. The Final Rule was followed up with PIH Notice 2017-3, SUBJECT: HUD Guidance on Instituting and Enforcing Smoke-Free Public Housing Policies, issued February 15, 2017.

SMHA approved and began implementation of a Non-Smoking Policy to comply with this mandate. Effective June 1, 2018 the Non-Smoking Policy was implemented by SMHA. Resident consultation was a part of the process prior to Board approval and prior to SMHA's implementation.

Project-Based Vouchers.

- **SMHA may issue an RFP for Project Based Vouchers to support expansion of quality affordable housing in keeping with the agency's mission statement. Other vouchers may be project-based for various developments if deemed feasible.**

	<p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <ul style="list-style-type: none"> • SMHA will continue to use this authority if and when needed during FYE 9/30/2021. <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <ul style="list-style-type: none"> • SMHA may apply for the above-referenced grants during FYE 9/30/2021. <p><u>Other Programs or Activities</u></p> <ul style="list-style-type: none"> • SMHA may purchase properties in Clark County where deemed feasible. If feasible, these would be purchased for housing development/redevelopment, to build or purchase a new administrative office, etc. • SMHA may pursue management over other outside housing project opportunities, if they become available. • SMHA may pursue management of other regional project based voucher programs if opportunities become available. <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> <ul style="list-style-type: none"> • For ease of reference SMHA's changes have been described <u>within</u> each category of New Activities in letter B.2 (a) above.
<p>B.3</p>	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p><u>See Attachment A</u></p>
<p>B.4</p>	<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 checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>

B.5 Progress Report.

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

PROGRESS ON GOALS & OBJECTIVES ESTABLISHED FOR FISCAL YEARS 2016 – 2020

The following table reflects the progress we have made in achieving our goals and objectives established for 2016 – 2020:

Goal: Expand the supply of assisted housing.	
Objective	Progress
Apply for additional rental vouchers if they become available during the year.	SMHA applied for VASH Vouchers and were 11 vouchers.
Maintain public housing vacancies no more than 2%.	FYE 9/30/2020 vacancy rate was 93.5%. Previous fiscal year rate was 97%.
Leverage private or other public funds to create additional housing opportunities.	Efforts of collaboration with Interfaith Housing Network for support of housing for the homeless population continued.
Utilize Replacement Housing Factor (RHF) Funds to complete infrastructure repair and rehabilitation of 5 (five) severely distressed units.	<p>SMHA has five units that have been vacant between six months and two years. SMHA anticipates the cost to repair these units will require almost all available RHF funds. In addition, SMHA has a fire damaged that requires substantial work; insurance proceeds will pay for most of the necessary repairs, however, a small portion will be covered by RHF and other SMHA funds if necessary.</p> <p>SMHA requested HUD approval to utilize RHF funds for these projects. HUD Office of Capital Improvements approved the request on October 28, 2020. SMHA engaged an architect and project manager to complete these renovations and intends to submit the units for mod rehab in PIC.</p> <p>The units are:</p> <ul style="list-style-type: none"> 1000 Robinson Dr. 1019 Robinson Dr. 1240 Innisfallen Ave 1712 Magnolia Blvd. ADA Unit 2132 Morgan St. 2024 Morgan St. (fire unit)

Goal: Improve the quality of assisted housing.	
Objective	Progress
Improve public housing management: (minimum PHAS score of 75 points each year).	PHAS score for FYE 9/30/2018 was 87, PHAS score for FYE 9/30/2019 was 88, PHAS score for FYE 2020 waiver was applied.
Improve voucher management: (maintaining a minimum SEMAP rating of Standard Performer or above each year).	SEMAP score for FYE 9/30/2020 waiver was applied, SEMAP score for FYE 9/30/2019 was 145. Previous score was 145. SMHA elected to adopt the SEMAP.

Improve specific management functions: Reduce unit turn around to 25 days or less on average.	For FYE 9/30/2020 average turnaround was excessively high due to COVID Previous fiscal year average was 50.88 an addition of 2.48 days.
Improve specific management functions: Maintain 100% done within 24 hours of emergency work order follow-up.	For FYE 9/30/2019 and 9/30/2020 100% completed within 24 hours
Improve specific management functions: Meet goals of FSS combined program for economic self-sufficiency.	For FYE 9/30/2020, there were 0 enrolled in the public housing FSS Program; 25 enrolled in the HCV FSS Program.
Renovate or modernize identified public housing units within the budgets not subject to Demo/Dispo.	No further major capital improvements occurred in FYE 2020.
Demolish or dispose obsolete scattered site public housing units older than 1978 and far too costly to maintain.	SMHA plans to submit a new demo/Dispo application to HUD in FY 2020 to demolish unit. If SMHA's demo/Dispo application for 124 E. Rose Street unit at the Hugh Taylor scattered site development is approved by HUD, SMHA plans to have unit demolished by 9/30/2021.

Goal: Increase assisted housing choices.	
Objective	Progress
Provide voucher mobility counseling during each briefing session.	Voucher mobility counseling continues to be part of each briefing session
Conduct outreach efforts to potential voucher landlords two times a year.	No landlord outreach meetings occurred in FYE 9/30/2020 due to COVID-.
Continue the voucher homeownership program.	Since inception of the program there have been two (2) participants that are now home owners. There has been little activity following the one closing in FY2015.

Goal: Provide an improved living environment.	
Objective	Progress
Implement measures to de-concentrate poverty by bringing higher income public housing households into lower income developments.	SMHA follows the Deconcentration Policy in the ACOP
Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments.	SMHA follows the Deconcentration Policy in the ACOP
Implement public housing security improvements.	An agreement between the local law enforcement agencies for provision of above base-line law enforcement services continued in FY 2020.
Maintain designated developments or buildings for particular resident groups (elderly and persons with disabilities).	A designated housing plan for occupancy only by elderly & near-elderly was prepared, approved by the SMHA Board, submitted to HUD in June 2016, approved by HUD in August 2016.

Goal: Promote self-sufficiency and asset development of assisted households.	
Objective	Progress
Increase the number and percentage of employed persons in assisted families by maintaining and implementing existing policies.	These efforts continue with the FSS program.
Provide or attract supportive services to improve assistance recipients' employability.	These efforts continue with the FSS programs

Goal: Ensure equal opportunity and affirmatively further fair housing	
Objective	Progress
Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability.	SMHA follows its Fair Housing Policy and has a commitment to affirmatively further fair housing for all individuals at all times. SMHA provides all of our residents with a quality dwelling unit that is maintained to HUD standards. SMHA adapts units as needed as a reasonable accommodation to elderly and persons with disabilities.
Target advertisements to achieve fair housing goals.	SMHA has remained a member of the Clark County Community Housing Resource Board which addresses fair housing concerns. Steps continue to be taken and implemented to address barriers of fair housing in the City of Springfield and Clark County by staff attending Fair Housing seminars in 2018-2019. SMHA continues to work with the City of Springfield Human Relations Department to remedy fair housing discrimination.

Goal: Improve and maintain risk management methods in property management and employment practices to avoid potential litigation situations.	
Objective	Progress
	Nothing to update in FYE 2020.

Goal: Maintain Asset Management program requirements.	
Objective	Progress
	SMHA is in full compliance with Asset Management requirements

<p>19 B.6</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p><u>See Attachment B</u></p>
<p>B.7</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>City of Springfield State of Ohio</p> <p><u>See Attachment C</u></p>
<p>B.8</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C.</p>	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
<p>C.1</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD Form 50075.2 approved by HUD on 08/21/2018. Note: Approval date was pulled from EPIC entry CFP 5-Yr 2018-2022.</p> <p>Capital Fund documents were formally part of the Five-Year & Annual Plan files. The Public Housing CFP Final Rule was published in the <i>Federal Register</i> October 24, 2013 and was effective on November 25, 2013. This CFP Final Rule decoupled the CFP from the PHA Annual Agency Plan.</p> <p>CFP documents must still be prepared during the 45-day review period, reviewed with the RAB, presented at the Public Hearing and approved by the Board of Commissioners. However they are to be submitted to HUD separately from the Agency Plan process, when "requested by HUD".</p> <p>SMHA is following all of these actions. CFP budgets (including a new Five-Year CFP Action Plan for FY 2020 - 2024) were prepared. They were presented to the Resident Advisory Board, at the Public Hearing for the 10/1/2020 Annual Agency Plan and will be approved by the Board of Commissioners after the comment period.</p> <p>Per the CFP Final Rule they will continue to be submitted separately from the Annual Plan. Per PIH Notice 2016-21, information on these documents is now entered into HUD's Energy Performance and Information Center (EPIC).</p>

Challenged Elements: Per the chart on page 4 of PIH Notice 2015-18, Subject: Availability of New and Revised Public Housing Agency (PHA) Five-Year and Annual Plan Templates and Other Forms, PHAs are to annually submit a statement of “Challenged Elements”.

This statement on Challenged Elements is included as Attachment D.

EXHIBIT 1

Statement of Housing Needs and Strategy for Addressing Housing Needs
(From section B.1 of PHA Plan Template, page 2)

A. Housing Needs of Families in the Jurisdiction of the Springfield Metropolitan Housing Authority:

SMHA used the 2015-2019 Consolidated Plan of The City of Springfield to provide a statement of the housing needs of families in the jurisdiction served by SMHA. The following are excerpts from the Consolidated Plan.

As cited in part on page 3 of the Consolidated Plan:

As an older city, Springfield contains several neighborhoods that face deteriorating infrastructure and facilities, aging housing stock, and economic establishments that may have become obsolete or marginally viable. As the regional economy continues to grow and housing costs continue to rise relative to incomes, a segment of the population faces increasingly challenging issues such as inadequate and unaffordable housing, poverty, deteriorating neighborhood conditions and quality of living, and limited access to services and facilities.

The CP is guided by three overarching objectives that are applied according to the community's needs. These HUD objectives and the City's projected outcomes over the 5 year CP years are:

1. To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing. (per year)
2. To provide a suitable living environment through safer, more livable neighborhoods, greater integration of low and moderate-income residents throughout the city, increased housing opportunities, and reinvestment in deteriorating neighborhoods.
3. To expand economic opportunities through an increased number of jobs that pay self-sufficient wages increased homeownership opportunities, development activities that promote long-term community viability, and the empowerment of low and moderate-income persons to achieve self sufficiency.

As cited in part on page 34 of the Consolidated Plan:

What are the most common housing problems?

Affordability is by for the largest housing problem in the City of Springfield.

As cited in part on page 173 of the Consolidated Plan:

Actions planned during the next year to address the needs to public housing:

City staff coordinates with SMHA on a regular basis. Both agencies are active participants in the Continuum of Care process and both coordinate together on the administration of three Continuum of Care Grants. The city's Fair Housing coordinator also coordinates with SMHA staff on Fair Housing and mediation issues. Additionally, SMHA holds a designated seat on the Community Grant Advisory Board and helps to guide the use of CDBG, HOME and ESG funds in the city. The City Commission appoints two members of the SMHA Board.

As of the census of 2010, there were 60,608 people residing in Springfield, OH. The racial makeup of the city was 18% Black or African American, 75% White, 1<% each Asian, Native American and Pacific Islander; 1.5% from some other race, and 4% from two or more races. 3% of the population was Hispanic or Latino of any race.

(Source: *CensusViewer.com*)

The median household income is \$57,100.

(Source: *HUD-USER*)

According to the most recent SOCDS CHAS Data, there were a total of 24,060 Renter and Owner Households in Springfield, OH

There were 4,455 households with household incomes at <=30% MFI. 3,280 (74%) of these households had a cost burden of greater than 30% of household income; 2,825 (63%) of these households had a cost burden of greater than 50% of household income.

There were 3,460 households with household incomes at >30 to <=50% MFI. 2,350(68%) of these households had a cost burden of greater than 30% of household income; 735 (21%) of these households had a cost burden of greater than 50% of household income.

(Source: *State of the City Data Systems: Comprehensive Housing Affordability Systems (CHAS) Data, 2008 - 2012*)

B. Housing Needs of Families on the waiting lists of Springfield Metropolitan Housing Authority:

Housing Needs of Families on the Waiting Lists – Public Housing Conventional and Elderly						
	# of families		% of total families		Annual Turnover	
	Public Housing conv	Public Housing conv-eld	Public Housing conv	Public Housing conv-elderly	Public Housing conv	Public Housing conv-eld
Waiting list total	89	15			17.8%	0.5%
Extremely low income <=30% AMI	79	13	88.8%	86.7%		
Very low income (>30% but <=50% AMI)	9	2	10.1%	13.3%		
Low income (>50% but <80% AMI)	1	0	1.1%	0.0%		
Families with children	34	0	38.2%	0.0%		
Elderly families	0	15	100%	100%		
Families with Disabilities	0	9	100%	6.0%		
White/Non-Hispanic	47	10	52.8%	66.7%		
Black/Non-Hispanic	44	5	49.4%	33.3%		
Hispanic-Non-Black	1	0	1.1%	0.0%		
Race/ethnicity Other	0	0	0.0%	0.0%		
Characteristics by Bedroom Size (Public Housing Only)						
1BR	33	15	37.1%	100%		
2 BR	35	0	39.3%	0.0%		
3 BR	16	0	18%	0.0%		
4 BR	5	0	5.6%	0.0%		
5 BR	0	0	0.0%	0.0%		

The public housing waiting list is currently open.

Housing Needs of Families on the Waiting Lists – Section 8					
	# of families		% of total families		Annual Turnover
	Section 8 Clark	Section 8 Champaign	Section 8 Clark	Section 8 Champaign	Section 8
Waiting list total	691	26			0%
Extremely low income <=30% AMI	689	26	99.7%	100%	
Very low income (>30% but <=50% AMI)	2	0	0.3%	0.0%	
Low income (>50% but <80% AMI)	0	0	0.0%	0.0%	
Families with children		14		53.8%	
Elderly families	1	0	0.01%	0.0%	
Families with Disabilities	162	0	1.62%	0.0%	
White/Non-Hispanic	344	17	49.8%	65.4%	
Black/Non-Hispanic	361	10	52.2%	38.5%	
Hispanic-Non-Black	3	0	0.4%	0.0%	
Race/ethnicity Other	10	0	1.4%	0.0%	
Characteristics by Bedroom Size (Public Housing Only)					

The Section 8 Clark County and Champaign County waiting lists are currently closed.

Housing Needs of Families on the Waiting Lists – Lincoln Park Public Housing & Mixed Finance			
	# of families Lincoln Park Public Housing/Mixed Finance	% of total families Lincoln Park Public Housing/Mixed Finance	Annual Turnover Lincoln Park Public Housing/Mixed Finance
Waiting list total	66		4%
Extremely low income <=30% AMI	60	90.9%	
Very low income (>30% but <=50% AMI)	4	6.06%	
Low income (>50% but <80% AMI)	2	3.03%	
Families with children	29	43.9%	
Elderly families	2	3.03%	
Families with Disabilities	8	12.1%	
White/Non-Hispanic	29	43.9%	
Black/Non-Hispanic	33	50.0%	
Hispanic-Non-Black	0	0.0%	
Race/ethnicity Other	1	1.52%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	39	59%	
2 BR	14	21.2%	
3 BR	12	18.2%	
4 BR	1	1.52%	
5 BR	0	0.0%	

There is a Site Based Waiting list at the Lincoln Park Mixed Finance AMPs and it is open

Strategy for Addressing Housing Needs:

To address the housing needs of families living within our jurisdiction and those on the waiting lists, some of the strategies Springfield Metropolitan Housing Authority will strive for include the following:

- Continue to affirmatively market our public housing units and the Section 8 program to elderly families, disabled families and all other families
- Continue to affirmatively market our public housing units and the Section 8 program to all race and ethnic groups residing within our jurisdiction and the surrounding area
- Continue to participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Continue to partner with other City and Clark County agencies, as well as state agencies that help provide additional housing and/or rehabilitation of housing.
- Continue to refer voucher holders to various local advocacy groups for assistance with needed supportive services that the Housing Authority does not provide.
- Continue to make reasonable on-demand accessible modifications as a reasonable accommodation to disabled families in our public housing units
- Apply for additional Housing Choice Vouchers if NOFAs are posted and it is determined that additional vouchers could be utilized
- Investigate ways to seek alternative funding sources through non-HUD grants opportunities.
- Continue to maintain low vacancy rate and turnaround time so that affordable housing remains readily available

The City of Springfield also acknowledges a lack of affordable housing for all eligible populations in the community in their recent Consolidated Plan. It is SMHA's intent to work with the City to develop strategies for addressing decent affordable rental housing in the community. SMHA and the City will look at administrative policies that might unintentionally influence the cost of housing in Springfield and will work together to better understand each other roles within the community, the housing market, and within the parameters of achieving to become high performers within HUD's funding programs.

Consultations with the City of Springfield Consolidated Plan and the RAB, as well as any funding and staffing constraints, may impact some of the above strategies.

EXHIBIT 2

DECONCENTRATION POLICY (From section B.1 of PHA Plan Template, page 3)

The following is SMHA's Deconcentration Policy as excerpted from the ACOP:

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

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

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

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

Step 1. The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

PHA Policy

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

Step 2. The PHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

PHA Policy

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

Step 3. The PHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (federal poverty level or 30 percent of median income, whichever number is higher).

Step 4. The PHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

PHA Policy

The PHA does not have any developments outside the EIR at this time.

Order of Selection [24 CFR 960.206(e)]

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

PHA Policy

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

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

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

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