

FY2024 VQ001 Annual Plan - Part 1

FY2024 Annual Plan

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: 03/31/2024
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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, 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-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 <u>do not</u> 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 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, 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 Type: Standard PH PHA Plan for Fiscal Year Be PHA Inventory (Based on Ar Number of Public Housing (Units/Vouchers <u>4.612</u> PHA Plan Submission Type Availability of Information. location(s) where the propose available for inspection by the and main office or central office encouraged to provide each re	Plan Submission Type: Annual Submission Revised PHAs must have the elements listed below readily available to the public. A PHA must identify the specific ion(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are able for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also uraged to provide each resident council a copy of their PHA Plans.				
	PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) Participating PHAs PHA Code Program(s) in the Consortia Program(s) not in the Consortia		Each Program			
	Lead PHA:		Trogram(s) in the consortal	Consortia	РН	HCV
B.	Plan Elements					

B.1	Revision of Existing PHA Plan Elements.
	(a) Have the following PHA Plan elements been revised by the PHA?
	Y N ⊠ Statement of Housing Needs and Strategy for Addressing Housing Needs - ⊠ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions ⊠ Financial Resources ⊠ Rent Determination ⊠ Operation and Management ⊠ Grievance Procedures ⊠ Homeownership Programs ⊠ Community Service and Self-Sufficiency Programs ⊠ Safety and Crime Prevention ⊠ Pet Policy ⊠ Asset Management ⊠ Substantial Deviation. ⊠ Significant Amendment/Modification
	(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):
	(c) The PHA must submit its Deconcentration Policy for Field Office review.
B.2	New Activities.
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
	Y N ⊠ Hope VI or Choice Neighborhoods ⊠ Mixed Finance Modernization or Development ⊠ Demolition and/or Disposition ⊠ Designated Housing for Elderly and/or Disabled Families ⊠ Conversion of Public Housing to Tenant-Based Assistance ⊠ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD ⊠ Occupancy by Over-Income Families ⊠ Occupancy by Police Officers ⊠ Non-Smoking Policies. ⊠ Project-Based Vouchers. ⊠ Units with Approved Vacancies for Modernization ⊠ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants)
	(b) If any of these activities are planned for the 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.
B.3	Progress Report.
	Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.
B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
В.5	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	$\begin{array}{c} Y & N \\ \Box & \boxtimes \end{array}$

	(b) If yes, please describe:
C.	Other Decument and/or Cartification Decuirements
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) have comments to the PHA Plan?
	Y N
	(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.
C.2	Certification by State or 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.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.
	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.
C.4	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.
	(a) Did the public challenge any elements of the Plan?
	Y N
	If yes, include Challenged Elements.
C.5	Troubled PHA. (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?
	$\begin{array}{c} Y & N \\ \square \\ \blacksquare \\ \end{array}$
	(b) If yes, please describe:
	(b) If yes, please describe.

D.	Affirmatively Furthering Fair Housing (AFFH).			
D.1	D.1 Affirmatively Furthering Fair Housing (AFFH). 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 fai 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.			
	Fair Housing Goal:			
	 Describe fair housing strategies and actions to achieve the goal: The VIHA will carry out the Plan in conformity with Title VIII of the Civil Rights Act of 1968, as amended, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990. The VIHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91. 			

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal:

The VIHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975. In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.

Fair Housing Goal: Describe fair housing strategies and actions to achieve the goal:

Affirmatively Furthering Fair Housing

Under the administration of its Public Housing, Housing Choice Voucher (HCV) and communities undergoing conversion with the Rental Assistance Demonstration (RAD) program and its resident services program, VIHA will carry out the Annual Plan in conformity with the Title VIII of the Civil Rights Act of 1968, as amended, the Fair Housing Act, and will affirmatively further fair housing through its procedures and policies and include information within agency-specific operational protocols and manuals for employees and program participants.

VIHA will provision annual training of all authority employees to avail knowledge of Fair Housing practices and requirements to include: Non-discrimination; participant grievance procedures, civil rights within the public housing program, the Housing Opportunity Through Modernization Act ("HOTMA"), Violence Against Women Act (VAWA), Limited English Proficiency (LEP) in its Rental Assistance Programs, and Fair Housing and Equal Opportunity requirements applicable to public notices announcing the opening and closing of the waiting lists for Housing Choice Tenant-Based Voucher ("Voucher") and Public Housing programs. These training courses will be coordinated by VIHA Human Resources Department along with its 504 Coordinator. To further its commitment to and practices that affirm compliance with Fair Housing laws, VIHA will enhance marketing of housing resources by evaluating and reviewing the demographics of occupying residents and those on the waiting lists, specifically for site-based, public housing, and housing choice voucher waiting lists overall. Reviews will be done semi-annually based upon occupancy rate of the development, degree of unit turnover, and in coordination with VIHA private management agents. To increase marketing to least likely to apply resident groups, efforts will be coordinated with local service-provider agencies and organizations who work with these demographics, including White, Hispanic/Latino and Asian residents of St. Thomas and St. Croix islands.

VIHA plans to reinforce Fair Housing practices by developing and disseminating Fair Housing education and materials designed to inform all employees and housing program participants on rights and responsibilities under Fair Housing annually and across the territory jurisdiction of VIHA. Activities may include but are not limited to:

- Create a taskforce for evaluating and reviewing the grievance process for site-based, public housing, and housing choice voucher programs.
- Increase efforts to market Affirmatively Furthering Fair Housing policies to inform residents participating in the same VIHA housing program of the accessibility to the range of housing choices available, regardless of race, color, religion, sex (including gender identity and sexual orientation), disability, familial status, or national origin.

Fair Housing and Rental Assistance Demonstration ("RAD") Property Owners and Development Partners When undergoing a subsidy conversion from Section 9 to Section 8 of the Act through the Rental Assistance Demonstration ("RAD"), the Property Owner and/or Development Partner will ensure that employees complete Fair Housing training as a part of New Hire On-Boarding training within 60 - 90 days of their date of hire.

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

- A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)
 - A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and 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. All PHAs must complete this section.

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

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

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very lowincome 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)(i))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR 903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration of poverty and family public housing developments. Refer to 24 CFR 8903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. Refer to 24 CFR 8903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR 8903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR 8903.7(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 8903.7(b)) Describe the unit assignment policies for public housing. (24 CFR 8903.7(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))

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

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

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

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

Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR \$903.7(m)) 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, 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)(54 CFR \$903.7(m))

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

Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. ($24 \text{ CFR} \frac{9903.7(q)}{2}$)

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 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 or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or

Choice Neighborhoods is a separate process. See guidance on HUD's website at: <u>https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6</u>. (Notice PIH 2011-47)

Mixed Finance Modernization or Development. 1) A description of any housing (including 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/mfp#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_dispo/index.cfm. (24 CFR §903.7(h))

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

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe 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 Rental Assistance or Project-Based Vouchers under RAD.

number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAL See additional guidance on HUD's website at: <u>Notice PIH 2012-32 REV-3</u>, successor RAD Implementation Notices, and other RAD notices.

 \bigtriangleup **Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.503) (24 CFR 903.7(b))

 \bigtriangleup Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR 903.7(b))

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

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR \$903.7(b)).

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).

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

- **B.3** Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(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. (<u>24 CFR §903.15</u>). 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.
- C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

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 in part 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.

Public reporting burden for this information collection is estimated to average 7.52 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.



FY2024 VQ001 Annual Plan - Part 2

FY2024 Annual Plan



The Virgin Islands Housing Authority (VIHA) has made considerable progress throughout FY 2023 in support of the Government of the Virgin Islands (GVI) achieving sustainable recovery. Before the hurricanes in 2017, VIHA had over \$200 million in deferred capital improvements to building systems in its inventory of 3,000 units of obsolete public housing. The impact of the hurricanes added another \$240 million in damages to this inventory. In the last five years since the devastating hurricanes, VIHA has aggressively used recovery funding to harden units, replace roofs, building systems, common areas and interior units. Consequently, the most recent hurricane in 2022 resulted in only half a million dollars in damages to the inventory.

In the last two years of the coronavirus pandemic, despite the impact of the coronavirus on operations, the overall health of VIHA continues to be financially strong due to well-managed federal programs and exceptional balance sheet has resulted in five years of 'clean' audits (no findings), positive cash flow, and adequate reserves.

Our short-term plan is to continue to collaborate with VITEMA and other independent agencies to anticipate, prepare and bolster our response to natural disasters to ensure the safety of our residents. Simultaneously, to ensure optimum management capacity, VIHA is aggressively seeking to increase our staffing in a labor-shortage environment. It is imperative to continue to manage the immediate repairs within our obsolete inventory. Increased unit inspections, along with 3rd Party Pre-National Standards for the Physical Inspection of Real Estate (NSPIRE) Inspections, will be implemented this year to ensure we have an accurate account of the health, safety and decency of each resident's living environment. We plan to implement long-term solutions in a changing climate-conscious environment.

Our long-term plan requires permanent solutions that will address inherent problems from the original design of public housing, constructed over 50 years ago that was, poorly designed, cheaply built and inadequately financed for building systems replacement. Accordingly, VIHA's comprehensive solution is to reposition the aged public housing portfolio with a strategy that will solve all the above issues and concerns.

Through this long-term planning, new opportunities will begin to arise in FY2024 for residents in the areas of homeownership, relocation, site-based waiting lists, project and Resident-based vouchers and implementation of a new Bright Path for resident services.

VIHA's \$1 billion dollar plan is in its 3rd year of implementation and the estimated cost has increased to \$2 Billion. The Repositioning & Redevelopment Plan incorporates the general demographic trends, from the census and waiting list, of smaller families which dictates a lower number of bedrooms that accommodates one, two and three bedrooms on average. Larger families will be accommodated with the flexibility of Vouchers. VIHA is expanding the management capacity of its Housing Choice Voucher Program to facilitate and increase reliance on Vouchers for short-term relocation and permanent housing as HUD aggressively implements its Rental Assistant Demonstration (RAD) program nationwide.

The Virgin Islands Housing Authority (VIHA) has made revisions to its Public Housing Annual Agency Plan for FY 2024 in the following areas highlighted below:

Section B1: Annual Plan Elements:

Housing Needs and Strategy for Addressing Housing Needs

In 2018, 2019 and 2022, VIHA commissioned the Urban Land Institute (ULI) to assist in coordinating Advisory Service Panels to obtain input from diverse stakeholders in the territory to ensure a cross section of voices and ideas are included in our Redevelopment Plan. Subsequent to the ULI meetings, VIHA has increased stakeholder meetings to further solicit feedback on the impact the Plan would have on schools, transportation, community policing, jobs, and ancillary services. VIHA has aggressively advocated for the expansion of its Housing Choice Voucher Program and the opportunity to address our housing needs through landlord participation by leasing to families on our waiting list. In fact, VIHA will employ a two-month rent incentive for landlords to provide units for leasing. VIHA also strongly supports the Virgin Islands Housing Finance Authority's Rental Rehabilitation and Reconstruction program to fund repairs of hurricane-damaged dwelling units to make available for applicants on our Voucher waiting list.

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

VIHA has reviewed relevant data from the Territory's Consolidated Plan and Housing Demand Study, our Public Housing and Housing Choice waiting lists, as well as our current resident demographics, to determine the level of deconcentration needed to balance the income levels in our portfolio. As a result, VIHA has determined that the current percentage of waiting list applicants and current resident percentage of extremely low-income households are just slightly above, and below 80% which presents a significant challenge to deconcentrate the public housing inventory. The HUD goal of de-concentration of poverty is admirable but is impractical to achieve when there is an abundance of very low and extremely low-income individuals as the source for families to be housed. However, through screening, VIHA will work to balance incomes in new or rehabilitated communities with a diversity of household incomes. The most promising way to achieve diversity of income levels is to increase efforts for job creation for individuals in the household. VIHA is working with the Department of Labor (Skills for Today) to increase the availability of training for jobs. The following waiting list data for St. Croix shows that 81% of families have extremely low income. Similarly, the waiting list data for St. Croix shows that 73% of families have extremely low income. Thus, deconcentration is unattainable without job creation.

Combined Housing Needs of Families on the Waiting List

	(As of June 23, 2023)	
Wa	iting List Data – Section 8	
	# of families	% of total families
Waiting List Total	838	
Extremely low income <=30% AMI	615	73.39%
Very low income (>30% but <=50% AMI)	161	19.21%
Low income (>50% but <80% AMI)	54	6.44%
Not Low	8	0.95%
Families with Elderly Families with Disabilities	78	9.31%
Families with Children	463	55.25%
Waiting	g List Population Breakdow	'n
Population Total	2,088	
Race/ethnicity - White	233	11.16%
Race/ethnicity - Black/African Native	1,321	63.27%
Race/ethnicity - Amer Ind/Alaska Native	4	0.19%
Race/ethnicity - Asian	1	0.05%
Race/ethnicity - Nat. Hawaiian/Pacific	5	0.24%
Race/ethnicity - Other	292	13.98%
Race/ethnicity - Declined	232	11.11%

Waiting List Data – HCVP Project Based (PB) St. Thomas				
	# of families	% of total families		
Waiting List Total	697			
Extremely low income <=30% AMI	477	68.44%		
Very low income (>30% but <=50% AMI)	151	21.66%		
Low income (>50% but <80% AMI)	64	9.18%		
Not Low	5	0.72%		
Families with Elderly	97	13.92%		
Families with Disabilities	21	3.01%		

Families with Children	285	40.89%			
Wa	Waiting List Population Breakdown				
Population Total	1267				
Race/ethnicity - White	70	5.52%			
Race/ethnicity - Black/African Native	980	77.35%			
Race/ethnicity - Amer Ind/Alaska Native	10	0.79%			
Race/ethnicity - Asian	4	0.32%			
Race/ethnicity - Nat. Hawaiian/Pacific	2	0.16%			
Race/ethnicity - Other	93	7.34%			
Race/ethnicity - Declined	108	8.52%			

Waiting List Data – Sugar Estate PB				
	# of families	% of total families		
Waiting List Total	29			
Extremely low income <=30% AMI	23	79.31%		
Very low income (>30% but <=50% AMI)	5	17.24%		
Low income (>50% but <80% AMI)	0	0.00%		
Not Low	1	3.45%		
Families with Elderly	25	86.21%		
Families with Disabilities	0	0.00%		
Families with Children	1	3.45%		
Waitin	g List Population Breakdow	/n		
Population Total	32			
Race/ethnicity - White	1	3.13%		
Race/ethnicity - Black/African Native	27	84.38%		
Race/ethnicity - Amer Ind/Alaska Native	0	0.00%		
Race/ethnicity - Asian	0	0.00%		
Race/ethnicity - Nat. Hawaiian/Pacific	0	0.00%		
Race/ethnicity - Other	0	0.00%		
Race/ethnicity - Declined	4	12.50%		

Waiting List Data – HCVP PB St. Croix				
	# of families	% of total families		
Waiting List Total	54			
Extremely low income <=30% AMI	40	74.07%		
Very low income (>30% but <=50% AMI)	10	18.52%		
Low income (>50% but <80% AMI)	3	5.56%		
Not Low	1	1.85%		
Families with Elderly	4	7.41%		
Families with Disabilities	0	0.00%		
Families with Children	37	68.52%		
Wa	aiting List Population Breakdowr	n		
Population Total	130			
Race/ethnicity - White	2	1.54%		
Race/ethnicity - Black/African Native	98	75.38%		
Race/ethnicity - Amer Ind/Alaska Native	1	0.77%		
Race/ethnicity - Asian	0	0.00%		
Race/ethnicity - Nat. Hawaiian/Pacific	0	0.00%		
Race/ethnicity - Other	21	16.15%		
Race/ethnicity - Declined	8	6.15%		

Waiting List Data – St. Croix Louis E. Brown I PB				
	# of families	% of total families		
Waiting List Total	1633			
Extremely low income <=30% AMI	1162	71.16%		
Very low income (>30% but <=50% AMI)	280	17.15%		
Low income (>50% but <80% AMI)	164	10.04%		
Not Low	27	1.65%		
Families with Elderly	161	9.86%		
Families with Disabilities	37	2.27%		

Families with Children	756	46.30%		
Waiting List Population Breakdown				
Population Total	3359			
Race/ethnicity - White	87	2.59%		
Race/ethnicity - Black/African Native	2727	81.18%		
Race/ethnicity - Amer Ind/Alaska Native	20	0.60%		
Race/ethnicity - Asian	6	0.18%		
Race/ethnicity - Nat. Hawaiian/Pacific	4	0.12%		
Race/ethnicity - Other	106	3.16%		
Race/ethnicity - Declined	409	12.18%		

Waiting List Data – St. Croix Louis E. Brown II PB		
	# of families	% of total families
Waiting List Total	8	
Extremely low income <=30% AMI	8	100.00%
Very low income (>30% but <=50% AMI)	0	0.00%
Low income (>50% but <80% AMI)	0	0.00%
Not Low	0	0.00%
Families with Elderly	3	37.50%
Families with Disabilities	0	0.00%
Families with Children	4	50.00%

Waiting List Population Breakdown		
Population Total	16	
Race/ethnicity - White	2	12.50%
Race/ethnicity - Black/African Native	10	62.50%
Race/ethnicity - Amer Ind/Alaska Native	0	0.00%
Race/ethnicity - Asian	0	0.00%
Race/ethnicity - Nat. Hawaiian/Pacific	0	0.00%
Race/ethnicity - Other	2	12.50%
Race/ethnicity - Declined	2	12.50%

Waiting List Data – St. Croix Louis E. Brown III PB		
	# of families	% of total families
Waiting List Total	788	
Extremely low income <=30% AMI	554	70.30%
Very low income (>30% but <=50% AMI)	139	17.64%
Low income (>50% but <80% AMI)	81	10.28%
Not Low	14	1.78%
Families with Elderly	83	10.53%
Families with Disabilities	17	2.16%
Families with Children	319	40.48%

Waiting List Population Breakdown		
Population Total	16	
Race/ethnicity - White	2	12.50%
Race/ethnicity - Black/African	10	62.50%
Native		
Race/ethnicity - Amer	0	0.00%
Ind/Alaska Native	-	
Race/ethnicity - Asian	0	0.00%
Race/ethnicity - Nat.	0	0.00%
Hawaiian/Pacific	0	0:0078
Race/ethnicity - Other	2	12.50%
Race/ethnicity - Declined	2	12.50%

Waiting List Data – St. Thomas		
	# of families	% of total families
Waiting List Total	397	
Extremely low income <=30% AMI	323	81.36%
Very low income (>30% but <=50% AMI)	47	11.84%
Low income (>50% but <80% AMI)	25	6.30%
Not Low	2	0.50%
Families with Elderly	75	18.89%
Families with Disabilities	41	10.33%

Families with Children	124	31.23%	
Waiting List Population Breakdown			
Population Total	692		
Race/ethnicity - White	7	1.01%	
Race/ethnicity - Black/African Native	467	67.49%	
Race/ethnicity - Amer Ind/Alaska Native	1	0.14%	
Race/ethnicity - Asian	2	0.29%	
Race/ethnicity - Nat. Hawaiian/Pacific	1	0.14%	
Race/ethnicity - Other	4	0.58%	
Race/ethnicity - Declined	210	30.35%	
Characteristi	cs by Bedroom Size (Public Hou	sing Only)	
Total Bedroom Size	397		
1BR	253	63.73%	
2 BR	91	22.92%	
3 BR	36	9.07%	
4 BR	14	3.53%	
5 BR	3	0.76%	

Waiting List Data – St. Croix		
	# of families	% of total families
Waiting List Total	540	
Extremely low income <=30% AMI	442	81.85%
Very low income (>30% but <=50% AMI)	69	12.78%
Low income (>50% but <80% AMI)	28	5.19%
Not Low	1	0.19%
Families with Elderly	85	15.74%
Families with Disabilities	13	2.41%
Families with Children	158	29.26%

Waiting List Population Breakdown		
Population Total	892	
Race/ethnicity - White	6	0.67%
Race/ethnicity - Black/African Native	838	93.95%
Race/ethnicity - Amer Ind/Alaska Native	2	0.22%
Race/ethnicity - Asian	1	0.11%
Race/ethnicity - Nat. Hawaiian/Pacific	0	0.00%
Race/ethnicity - Other	2	0.22%
Race/ethnicity - Declined	43	4.82%
Characteristics	by Bedroom Size (Public Ho	using Only)
Total Bedroom Size	540	
1BR	342	63.33%
2 BR	140	25.93%
3 BR	43	7.96%
4 BR	13	2.41%
5 BR	2	0.37%

Waiting List Data – St. Croix Louis E. Brown I		
	# of families	% of total families
Waiting List Total	550	
Extremely low income <=30% AMI	493	89.64%
Very low income (>30% but <=50% AMI)	40	7.27%
Low income (>50% but <80% AMI)	14	2.55%
Not Low	3	0.55%
Families with Elderly	59	10.73%
Families with Disabilities	4	0.73%
Families with Children	188	34.18%

Waiting List Population Breakdown		
Population Total	1021	
Race/ethnicity - White	9	0.88%
Race/ethnicity - Black/African Native	878	85.99%
Race/ethnicity - Amer Ind/Alaska Native	3	0.29%
Race/ethnicity - Asian	0	0.00%
Race/ethnicity - Nat. Hawaiian/Pacific	1	0.10%
Race/ethnicity - Other	44	4.31%
Race/ethnicity - Declined	86	8.42%
Characteristic	s by Bedroom Size (Public Hous	ing Only)
Total Bedroom Size	550	
1BR	338	61.45%
2 BR	115	20.91%
3 BR	93	16.91%
4 BR	4	0.73%
5 BR	0	0.00%

Waiting List Data – St. Croix Louis E. Brown II		
	# of families	% of total families
Waiting List Total	91	
Extremely low income <=30% AMI	76	83.52%
Very low income (>30% but <=50% AMI)	13	14.29%
Low income (>50% but <80% AMI)	2	2.20%
Not Low	0	0.00%
Families with Elderly	90	98.90%
Families with Disabilities	2	2.20%
Families with Children	0	0.00%

Waiting List Population Breakdown		
Population Total	105	
Race/ethnicity - White	5	4.76%
Race/ethnicity - Black/African Native	57	54.29%
Race/ethnicity - Amer Ind/Alaska Native	0	0.00%
Race/ethnicity - Asian	0	0.00%
Race/ethnicity - Nat. Hawaiian/Pacific	0	0.00%
Race/ethnicity - Other	18	17.14%
Race/ethnicity - Declined	25	23.81%
Characteristi	cs by Bedroom Size (Public Hous	sing Only)
Total Bedroom Size	91	
1BR	0	0.00%
2 BR	91	100.00%
3 BR	0	0.00%
4 BR	0	0.00%
5 BR	0	0.00%

AMP Number	Development Name	Numbe r of Occupi ed Units	Inc	rerage come As of /12/2023	Ave Br Calc	Av Inc Div	velopment erage :ome rided by Factor	PHA Wide 85% - 115% Percentage relative to EIR	Acceptable Justification
	1	1		St. Thom	as	1			
VQ001000011	Oswald E. Harris Court	284	\$	22,866	1.13	\$	20,284	100%	
VQ001000013	Estate Bovoni Apartments	342	\$	22,249	1.11	\$	20,024	99%	
VQ001000014	Paul M. Pearson Gardens	117	\$	23,494	1.03	\$	22,840	113%	
VQ001000014	H. H. Bergs Homes	50	\$	24,805	1.03	\$	24,200	119%	Combined EIR is 86.5%
VQ001000014 VQ001000014	Addition to Bergs Homes Lucinda A. Millin Home	24	\$	13,089	0.72	\$	10,892	<u>54%</u> 83%	which is within the required percentage 96% of the residents are Elderly and/or Disabled.*
VQ001000015	Michael J. Kirwan Terrace	120	\$	27,340.79	1.20	\$	22,849.05	113%	
	The Knolls at								This development has a low turnover rate. 49% of the HOH are unemployed. 78% of the HOH is female. 34%
VQ001000015	Contant	94	\$	34,184.48	1.15	\$	29,711.89	146%	are 0 Rent.*

* Data as per VIHA's January 20223 Community Profile Report.

Average BR Calculation Factor - *The calculation is based on PIH Notice Notices: PIH 2001-4 (HA). The bedroom adjustment factor based on national rent averages for units grouped by the number of bedrooms, and which has been used by HUD to adjust for costs of units when the number of bedrooms vary. The bedroom adjustment factor is the unit-weighted average of the distribution. If a PHA average incomes above or below 85% to 115% of the average incomes for each development, the PHA must provide an explanation/justification for the percentage range.*

EIR = Established Income Range - *Based on 24 CFR Part 903 Public Housing Agency Plans: Deconcentration Amendments to Established Income Range Definition; Proposed Rule (b), PHA shall determine whether each of its covered developments falls above, within or below the Established Income Range. The Established Income Range is 85 percent of the average family income to the greater of either 115 percent (inclusive of 85 percent and 115 percent) of the PHA-wide average income for covered developments as defined in Step 1 or an average family income at which a family would be defined as an extremely low-income family under 24 CFR 5.603.*

AMP Number	Development Name	Number of Occupied Units	Average Income As of 06/12/2023	Ave Br Calc	Development Average Income Divided by BR Factor	PHA Wide 85% - 115% Percentage relative to EIR	Acceptable Justification
		Γ	St. Croix			1	
	D. Hamilton Jackson						
VQ001000021	Terrace	90	\$ 15,576.48	1.03	\$ 15,147.30	110%	
V-001000001	Alphonso "Piggy" Gerard	01	¢ 01.000.10		¢ 10 575 54	12597	52% of HOH is unemployed. 83% HOH is female. Site transitionIng to the Rental Assistance Demonstratio n Program
VQ001000021	Complex	21	\$ 21,229.19	1.14	\$ 18,575.54	135%	(RAD).
VQ001000022	John F. Kennedy Terrace	68	\$ 15,036.04	1.10	\$ 13,619.97	99%	
VQ001000022	Joseph E. James Terrace	34	\$ 9,243.41	1.25	\$ 7,394.73	54%	97% elderly/disabl ed. 975 unemployed. 53% of HOH is
VQ001000023	Aureo Diaz Heights	98	\$ 11,327.12	1.10	\$ 10,314.61	75%	unemployed. 69% HOH is female and 54% are 0 rent.
	Mount						
VQ001000023	Pleasant Candido R. Guadalupe	43	\$ 12,436.60	0.92	\$ 13,521.47	99%	48% of HOH unemployed. 82% of HOH is female and 64% of HOH
VQ001000023	Terrace	87	\$ 11,706.48	1.13	\$ 10,403.11	76%	are 0 Rent.
VQ001000024	Marley Homes	31	\$ 15,000.35	1.17	\$ 12,827.89	94%	
VQ001000024	Addition to Marley Homes	56	\$ 14,812.52	1.13	\$ 13,156.24	96%	
	Williams'						Although a 5(h) homeowners hip site, 51% of HOH is unemployed,
VQ001000025	Delight Villas	102	\$ 18,367.89	1.15	\$ 16,013.03	117%	80% of HOH is

							female, 38% HOH are 0 rent and 39% of HOH is elderly/disabl ed.
VQ001000025	Wilfred Pedro Homes	93	\$ 8,719.82	0.85	\$ 10,258.61	75%	84% of HOH is elderly/disabl ed. 85% of HOH are unemployed. 58% of HOH are 0 rent.
VQ001000026	Louis E Brown I Redevelopme nt Louis E Brown II Redevelopme	72	\$ 15,293.28	0.85	\$ 17,992.09	109%	
VQ001000027	nt	9	\$ 11,351.89	0.85	\$ 13,355.16	97%	

* Data as per VIHA's January 20223 Community Profile Report.

Based on the analysis of June 12, 2023, income levels at 21 developments within VIHA. Only nine sites fell within the range of 85% to 115%. The remaining 12 sites fall above or below the requirement. The "Acceptable Justification" for each development provided justifies the issues that are affecting each site. VIHA will continue to monitor this on a quarterly basis and work with partnering agencies to develop a plan to correct many of the issues.

St. Croix			St. Thomas				Combined			
Below 85%	Over 115%	Within Range	Below 85%	Over 115%	Within Range		Below 85%	Over 115%	Within Range	
4	2	7	2	2	4		6	4	11	

Financial Resources

VIRGIN ISLANE	DS HOUSING AUTH	IORITY					
Planned Sources and Uses							
Sources	Planned S	Planned Uses					
1. Federal Grants (FY 2023 grants)							
a) Public Housing Operating Fund (2023) projected	\$18,919,581	Public Housing Operations					
_		Public Housing Modernization and					
b) Public Housing Capital Fund	\$0	Development					
c) HOPE VI Revitalization	\$0						
d) HOPE VI Demolition	\$0						
e) Annual Contributions for Section 8 Tenant-Based	\$16,411,588	Housing Choice Voucher HAP (\$14,481,307					
Assistance (FY 2023 Projected)	\$10,111,200	and Admin Operations (\$1,930,251)					
f) Resident Opportunity and Self-Sufficiency Grants	\$98,883	Resident Services Program Support					
Other Federal Grants (list below)							
Mainstream Vouchers	\$97,212						
Foster Youth To Independence (FYI)	\$130,517						
Emergency Housing Vouchers (EHV)	\$659,751						
Single Room Occupancy (SRO) Vouchers	\$45,539	Housing Choice Voucher -Rehabilitation					
	\$75,557	Program HAP and Admin Operations					
Shelter Care (SC) Vouchers	\$0	Housing Choice Voucher - Shelter Care HAP					
		And Admin Operations					
Community Development Block Grant - Disaster Recovery	\$56,650,000	Walter IM Hodge Revitalization and Donoe					
(CDBG-DR)		Redevelopment Projects					
FEMA Public Assistance	\$238,000,000	Grant Funding for repairs, demolition and replacement of hurricane-damaged properties					
FEMA FUBIC Assistance	\$238,000,000	awarded to VIHA from FEMA					
FEMA Hazard Mitigation Grant Program		FEMA Grant Funding awarded to VIHA to					
		provide additional hazard mitigation and					
	\$26,000,000	resiliency to the Walter IM Hodge					
		Revitalization, Marley Headstart Bldg. and					
		Oswald Harris Court Wind Retrofit					
2. Prior Year Federal Grants (unobligated funds only)							
(list below)							
US Dept of Labor Youth Build	\$0	Affordable Housing/ Supportive Services					
3. Capital Fund Grants							
CFP 2023	\$10,888,276	Public Housing Modernization					
CFP 2022	\$4,165,530	Public Housing Modernization					
CFP 2021	\$271,531	Public Housing Modernization					
CFP 2020	\$131,917	Public Housing Modernization					
CFP 2019	\$89,076	Public Housing Modernization					
4. Replacement Housing Grants							
2016-1	\$0	PH Replacement Housing/Vacancy Rehab					
2015-1	\$0	PH Replacement Housing/Vacancy Rehab					
5. Public Housing Dwelling Rental Income	\$3,425,583	Public Housing Operations					
6. Other income (list below)							
Bad Debt Collection	\$48,000	Public Housing Operations					
interest	\$61,000	Public Housing Operations					
7. Non-federal sources (list below)							
Local—Youth Academics	\$0	Supportive Services					
Local - Youth Build	\$0	Supportive Services					
8. Non-Federal Sources (other)							
Developer Fee	\$0	Affordable Housing Development					
Total Resources	\$376,093,984						

Operation and Management

Revision of the Admissions and Continued Occupancy Policy (ACOP) and Dwelling Lease

Currently, the ACOP has the following language relative to security deposits for the apartment units: The Resident shall pay a security deposit at the time of leasing. For new Residents, the security deposit shall be Two Hundred Five Dollars (\$205.00). The Resident may pay the security deposit in one lump sum or spread it over three (3) payments during the first three (3) months of tenancy. Pet deposits are in addition to the security deposit and must be paid in accordance with this policy. 24 CFR § 966.4(b) (5).

The new security deposit amount is proposed to be at minimum \$300 or the cost of one month's rent, whichever is greater. Imposing a higher deposit assist with the increasing cost of unit turns and assists in deterring residents from damaging the units beyond normal wear and tear. Based on public comments/concerns of the immediate implementation of this increase in the security deposit, VIHA will afford a 1-year grace period before final implementation of this increase.

Update of Utility Allowances:

Utility Allowances have been updated as per 24 CFR 965.507(b) and the newly issued Utility Chapter of the Public Housing Guidebook. "A PHA is required to revise utility allowances when there is a rate or cost change of at least 10 percent since the last adjustment. Required adjustments are retroactive to the first day of the month following the effective rate change and are not subject to the 60-day tenant notification requirement."

Utility Allowances for FY2023-2024 will be based on the last Utility Allowance Study that was completed in July 2022.

Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA)

VIHA is committed to taking proactive steps to address issues related to domestic violence under the Violence Against Women Act (VAWA). In pursuit of this commitment, VIHA will develop a Memorandum of Understanding (MOU) in collaboration with the Virgin Islands Department of Human Services and the Family Resource Center. These two agencies bring substantial expertise in assisting victims of domestic violence, and this collaboration promises mutual benefits for both VIHA's employees and residents.

By partnering with the Virgin Islands Department of Human Services and the Family Resource Center, VIHA aims to create a supportive and responsive environment for those affected by domestic violence. This collaboration harnesses the agencies' collective experience to provide comprehensive assistance, guidance, and resources to residents facing domestic violence situations.

VIHA is committed to ensuring that its employees and residents are well-informed and equipped to address domestic violence issues. To achieve this, annual training sessions will be meticulously planned for employees. Additionally, periodic meetings will be organized to facilitate open dialogues and support networks among residents.

VIHA recognizes the importance of making information readily available to its community members. To ensure easy access to resources and assistance, informative flyers will be distributed at all VIHA sites and Central Offices. Furthermore, comprehensive information related to domestic violence, support services, and contact details will be prominently featured on VIHA's website and Facebook page.

In conclusion, VIHA's partnership with the Virgin Islands Department of Human Services and the Family Resource Center demonstrates a proactive approach to addressing domestic violence concerns under VAWA. This collaboration underscores VIHA's commitment to the well-being and safety of its residents and employees. Through ongoing education, support, and accessible resources, VIHA aims to create a safe and supportive environment for all those affected by domestic violence within its communities and other subsidized programs.

Grievance Procedures

HEARING OFFICER

The Department of Asset Management has awarded 2 vendors contracts for qualified neutral third-party hearing officers through the Procurement Division of the Virgin Islands Housing Authority, in accordance with Virgin Islands Housing Authority procurement requirements.

For all hearings, the Hearing Officer will consist of a neutral third-party hearing officer.

Homeownership Programs

The Williams Delight Villas, built in 1969, consisted of 300 single-family detached homes. The physical address of the property is 158 & 159 Estate Williams Delight, Frederiksted, St. Croix. Section 5(h) authorized by Section 32 Housing Act of 1937 allows for the sale of public housing units to eligible low-income households. The sale proceeds of these sales are used to meet other low-income housing needs.

VIHA's current 5(h) Homeownership Plan at Williams Delight Villas was approved in 1995 and amended in 2012 to authorize the sale of up to 50 homes. As of June 9, 2023, 35 homes have been sold and 183 have been targeted for demolition per Section 18, leaving 82 homes that can be sold under Section 5(h). The Board of Commissioners has authorized amending the Plan to allow for the sale of up to 117 units under Section 5(h), which covers the 35 homes sold to date plus the additional 82 homes that are deemed suitable for renovation and sale. The priorities previously approved in the Plan remains the same.

First Priority	Residents currently living at Williams Delight Villas (residency required for at least six months.)
Second Priority	Former Williams Delight Villas Residents who are Military Veterans living in other St. Croix VIHA communities or Military Veterans who are Housing Choice Voucher (Section 8) voucher-holders living on St. Croix.
Third Priority	Former Williams Delight Villas Residents living in other St. Croix VIHA communities or Housing Choice Voucher (Section 8) voucher-holders living on St. Croix.

Fourth Priority

Former Williams Delight Villas Residents living in the U.S. Virgin Islands.

VIHA is also amending its Section 8(y) Homeownership to make this resource available to elderly and disabled Williams Delight residents.

<u>Bedroom Size</u>	<u>Sold</u>	Occupied	Vacant Units	<u>Total</u>
2BR	15	50	84	149
3BR	19	40	60	119
4BR	1	10	21	32
Total	35	100	165	300

The chart below provides the occupancy status as of June 9, 2023:

A structural and architectural investigation Williams Delight units in May 2022 by Dynotec, a prior structural report by Creative Housing Solutions in 2019 of the units on the East side, and an assessment by VIHA staff on certain selected units in 2023 are the basis for determining that 183 are not suited for renovation and should be demolished.

As part of the Section 5(h) Plan, homes where renovation costs exceed allowable costs for renovation, are located within the flood where homebuyers cannot procure flood insurance or are structurally unsound will be demolished. VIHA will repair for-sale units to meet local code and HUD habitability standards prior to sale. The average per unit hard cost to renovate occupied homes is estimated at \$15,319, while the average per unit hard cost to renovate vacant homes is estimated at \$69,036.

The chart below shows the sale prices of homes sold as-is and those sold after substantial renovation.

Bedroom Size		"As-Is"	Price Point "Rehabilitated" Vacant Homes
Two-Bedroom	585	\$22,000	\$52,000
Three-Bedroom	725	\$25,000	\$65,000
Four-Bedroom	845	\$30,000	\$78,000

Obtaining financing for the home is a responsibility of the buyer. Eligible homeowners have the option of utilizing the traditional financial institutions, the USDA Rural Development Program, or and any other Local or Federal programs that they may be eligible to obtain mortgage financing. In addition, families have the option to do a cash purchase. For any sale transaction, the Head of Household must be lease compliant and not owe rent.

Success in obtaining financing will depend on the household's credit history, employment history, and amount of outstanding debt and/or availability of co-signers. Counselling and individual assistance will be

provided to prospective buyers on financial planning, budgeting, and loan application procedures through the Virgin Islands Housing Finance Authority. Mortgage assistance is also available to eligible participants through the Virgin Islands Housing Finance Authority's HOME Program.

The following describes the application responsibilities for all prospective purchasers:

- All prospective purchasers must complete and provide a Williams Delight Survey and Letter of Intent to Purchase.
- A prospective purchaser of a home must be income eligible. The prospective purchaser's income must be at or below 80% of AMI based on household size if they are purchasing a home other than their current residency. If the resident that is currently living in the home has an income over 80% AMI, the maximum income requirement of 80% AMI is waived. If a prospective purchaser who is not currently residing in a home decides to purchase a home, the income requirement, of 80% of AMI applies.
- A prospective purchaser must have an acceptable credit score. Prospective Lenders will run a credit report.
- Prospective purchasers must be a first-time homebuyer or cannot have owned a home in the past three years and must not own any other home.
- The prospective purchaser must have a reliable and consistent source of income, evidenced for at least 12 months.
- Prospective purchaser must meet the underwriting standards set by the lender in accordance with the ratio requirements pertaining to income and debt.
- Prospective purchasers must contribute no less than one percent (1%) of their own funds towards the down payment of a house. Prospective purchasers are permitted to use grants, gifts from relatives, contributions from private sources, and other similar sources for the remainder of the down payment VIHA will retain records verifying the source(s) of this one percent contribution.
- The prospective purchaser must have a history of consistent rental payments with VIHA for a minimum of six months.
- Prospective purchasers must be able to afford monthly mortgage payments including taxes, insurance, utilities, maintenance, and other fees associated with homeownership (e.g., association dues), not to exceed 35% of adjusted gross income.
- Each prospective purchaser must agree that the home will be the purchasers' principal residence.
- Head of Household must be lease compliant and not owe rent.

WILLIAMS DELIGIHT HOMEOWNERSHIP PROGRAM [24 CFR 982.625 through 982.643] OVERVIEW [24 CFR 982.625]

The Authority will set aside up to twenty-five (25) Resident-based vouchers for eligible VIHA residing at Williams Delight. Eligible families must be admitted into the Housing Choice Voucher Program in accordance with the requirements of 24 CFR 982,617 (a)(1), be a first-time homebuyer, be an elderly or disabled household, and meet the income requirements per 24 CFR Part 982,627(c).

The homeownership option is used to assist a family residing in a home purchased and owned by one or more members of the family. A family assisted under this option may be newly admitted or an existing participant in the HCV program. The PHA must have the capacity to operate a successful HCV

homeownership program as defined by the regulations. There are two forms of homeownership assistance described in the regulations: monthly homeownership assistance payments, and single down payment assistance grants. However, PHAs may not offer down payment assistance until funding is allocated by Congress. Until this happens, a PHA may only offer monthly homeownership assistance. The PHA must offer homeownership assistance if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities. It is the sole responsibility of the PHA to determine whether it is reasonable to implement a homeownership program as a reasonable accommodation. The PHA must determine what is reasonable based on the specific circumstances and individual needs of the person with a disability. The PHA may determine that it is not reasonable to offer homeownership assistance as a reasonable accommodation in cases where the PHA has otherwise opted not to implement a homeownership program. The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disability.

FAMILY ELIGIBILITY [24 CFR 982.627]

Eligible families must be participating in the Authority Williams Delight Section 5(h) or Section 32 Homeownership Program, be admitted into the Housing Choice Voucher Program in accordance with the requirements of 24 CFR 982,617 (a)(1), be a first-time homebuyer, be an elderly or disabled household, and meet the income requirements per 24 CFR Part 982,627(c).

The family must meet all of the requirements listed below before the commencement of homeownership assistance. The PHA may also establish additional initial requirements as long as they are described in the PHA administrative plan.

- The family must have been admitted to the Housing Choice Voucher program.
- The family must qualify as a first-time homeowner or may be a cooperative member.
- The family must meet the Federal minimum income requirement. The family must have a gross annual income equal to the Federal minimum wage multiplied by 2000, based on the income of adult family members who will own the home.

The PHA may establish a higher income standard for families. However, a family that meets the federal minimum income requirement (but not the PHA's requirement) will be considered to meet the minimum income requirement if it can demonstrate that it has been pre-qualified or pre-approved for financing that is sufficient to purchase an eligible unit.

- For disabled families, the minimum income requirement is equal to the current SSI monthly payment for an individual living alone, multiplied by 12.
- For elderly or disabled families, welfare assistance payments for adult family members who will own the home will be included in determining whether the family meets the minimum income requirement. It will not be included for other families.
- The family must satisfy the employment requirements by demonstrating that one or more adult members of the family who will own the home at commencement of homeownership assistance is currently employed on a full-time basis (the term 'full-time employment' means not less than an average of thirty (30) hours per week); and has been continuously so employed during the year before commencement of homeownership assistance for the family.
- The employment requirement does not apply to elderly and disabled families. In addition, if a family, other than an elderly or disabled family includes a person with disabilities, the PHA must

grant an exemption from the employment requirement if the PHA determines that it is needed as a reasonable accommodation.

- The family has not defaulted on a mortgage securing debt to purchase a home under the homeownership option.
- Except for cooperative members who have acquired cooperative membership shares prior to commencement of homeownership assistance, no family member has a present ownership interest in a residence at the commencement of homeownership assistance for the purchase of any home.
- Except for cooperative members who have acquired cooperative membership shares prior to the commencement of homeownership assistance, the family has entered a contract of sale in accordance with 24 CFR 982.631(c).

SELECTION OF FAMILIES [24 CFR 982.626]

Unless otherwise provided (under the homeownership option), the PHA may limit homeownership assistance to families or purposes defined by the PHA and may prescribe additional requirements for commencement of homeownership assistance for a family. Any such limits or additional requirements must be described in the PHA administrative plan. If the PHA limits the number of families that may participate in the homeownership option, the PHA must establish a system by which to select families to participate.

ELIGIBLE UNITS [24 CFR 982.628]

In order for a unit to be eligible, the PHA must determine that the unit satisfies all of the following requirements:

- The unit must meet HUD's "eligible housing" requirements. The unit may not be any of the following:
 - A public housing or Indian housing unit
 - A unit receiving Section 8 project-based assistance
 - A nursing home, board and care home, or facility providing continual psychiatric, medical, or nursing services
 - A college or other school dormitory
 - On the grounds of penal, reformatory, medical, mental, or similar public or private institutions
- The unit must be under construction or already exist at the time the family enters into the contract of sale.
- The unit must be a one-unit property or a single dwelling unit in a cooperative or condominium
- The unit must have been inspected by the PHA and by an independent inspector designated by the family.
- The unit must meet Housing Quality Standards.
- For a unit where the family will not own fee title to the real property (such as a manufactured home), the home must have a permanent foundation and the family must have the right to occupy the site for at least 40 years.
- For PHA-owned units all of the following conditions must be satisfied:
 - The PHA informs the family, both orally and in writing, that the family has the right to purchase any eligible unit and a PHA-owned unit is freely selected by the family without PHA pressure or steering.

- The unit is not ineligible housing.
- The PHA obtains the services of an independent agency to inspect the unit for compliance with HQS, review the independent inspection report, review the contract of sale, determine the reasonableness of the sales price and any PHA provided financing.

All of these actions must be completed in accordance with program requirements. The PHA must not approve the unit if the PHA has been informed that the seller is debarred, suspended, or subject to a limited denial of participation.

HOMEOWNERSHIP COUNSELLING [24 CFR 982.630]

Before commencement of homeownership assistance for a family, the family must attend and satisfactorily complete the pre-assistance homeownership and housing counselling program required by the PHA. HUD suggests the following topics for the PHA-required pre-assistance counselling:

- Home maintenance (including care of the grounds)
- Budgeting and money management
- Credit counselling
- How to negotiate the purchase price of a home
- How to obtain homeownership financing and loan pre-approvals, including a description of types of financing that may be available, and the pros and cons of diverse types of financing.
- How to find a home, including information about homeownership opportunities, schools, and transportation in the PHA jurisdiction
- Advantages of purchasing a home in an area that does not have a high concentration of low-income families and how to locate homes in such areas.
- Information on fair housing, including fair housing lending and local fair housing enforcement agencies; and
- Information about the Real Estate Settlement Procedures Act (12 U.S.C. 2601 et seq.) (RESPA), state and Federal truth-in-lending laws, and how to identify and avoid loans with oppressive terms and conditions.

The PHA may adapt the subjects covered in pre-assistance counselling (as listed) to local circumstances and the needs of individual families. The PHA may also offer additional counselling after commencement of homeownership assistance (ongoing counselling). If the PHA offers a program of ongoing counselling for participants in the homeownership option, the PHA shall have discretion to determine whether the family is required to participate in the ongoing counselling. If the PHA does not use a HUD-approved housing counselling agency to provide the counselling, the PHA should ensure that its counselling program is consistent with the counselling provided under HUD's Housing Counselling program.

HOME INSPECTIONS, CONTRACT OF SALE, AND PHA DISAPPROVAL OF SELLER [24 CFR 982.631]

The PHA may not commence monthly homeownership assistance payments for a family until the PHA has inspected the unit and has determined that the unit passes HQS. An independent professional inspector selected by and paid for by the family must also inspect the unit. The independent inspection must cover major building systems and components, including foundation and structure, housing interior and exterior, and the roofing, plumbing, electrical, and heating systems. The independent inspector must be qualified to report on property conditions, including major building systems and components. The PHA may not require

the family to use an independent inspector selected by the PHA. The independent inspector may not be a PHA employee or contractor, or other person under control of the PHA. However, the PHA may establish standards for qualification of inspectors selected by families under the homeownership option.

The PHA may disapprove a unit for assistance based on information in the independent inspector's report, even if the unit was found to comply with HQS. Contract of Sale Before commencement of monthly homeownership assistance payments, a member or members of the family must enter into a contract of sale with the seller of the unit to be acquired by the family. The family must give the PHA a copy of the contract of sale. The contract of sale must:

- Specify the price and other terms of sale by the seller to the purchaser.
- Provide that the purchaser will arrange for a pre-purchase inspection of the dwelling unit by an independent inspector selected by the purchaser.
- Provide that the purchaser is not obligated to purchase the unit unless the inspection is satisfactory to the purchaser.
- Provide that the purchaser is not obligated to pay for any necessary repairs; and
- Contain a certification from the seller that the seller has not been debarred, suspended, or subject to a limited denial of participation under CFR part 24.

In its administrative discretion, the PHA may deny approval of a seller for the same reasons a PHA may disapprove an owner under the regular HCV program [see 24 CFR 982.306(c)].

FINANCING [24 CFR 982.632]

The PHA may establish requirements for financing purchase of a home under the homeownership option. This may include requirements concerning qualification of lenders, terms of financing, restrictions concerning debt secured by the home, lender qualifications, loan terms, and affordability of the debt. The PHA must establish policies describing these requirements in the administrative plan. A PHA may not require that families acquire financing from one or more specified lenders, thereby restricting the family's ability to secure favorable financing terms.

CONTINUED ASSISTANCE REQUIREMENTS; FAMILY OBLIGATIONS [24 CFR 982.633]

Homeownership assistance may only be paid while the family is residing in the home. If the family moves out of the home, the PHA may not continue homeownership assistance after the month when the family moves out. The family or lender is not required to refund to the PHA the homeownership assistance for the month when the family moves out. Before commencement of homeownership assistance, the family must execute a statement in which the family agrees to comply with all family obligations under the homeownership option. The family must comply with the following obligations:

- The family must comply with the terms of the mortgage securing debt incurred to purchase the home, or any refinancing of such debt.
- The family may not convey or transfer ownership of the home, except for purposes of financing, refinancing, or pending settlement of the estate of a deceased family member. Use and occupancy of the home are subject to 24 CFR 982.551 (h) and (i).
- The family must supply information to the PHA, or HUD as specified in 24 CFR 982.551(b). The family must further supply any information required by the PHA or HUD concerning mortgage financing or refinancing, sale, or transfer of any interest in the home, or homeownership expenses.

- The family must notify the PHA before moving out of the home.
- The family must notify the PHA if the family defaults on the mortgage used to purchase the home.
- No family member may have any ownership interest in any other residential property.
- The family must comply with the obligations of a participant family described in 24 CFR 982.551, except for the following provisions which do not apply to assistance under the homeownership option: 24 CFR 982.551(c), (d), (e), (f), (g) and (j). 15-VII.J

MAXIMUM TERM OF HOMEOWNER ASSISTANCE [24 CFR 982.634]

Except in the case of a family that qualifies as an elderly or disabled family, other family members (described below) shall not receive homeownership assistance for more than:

- Fifteen years, if the initial mortgage incurred to finance purchase of the home has a term of twenty (20) years or longer; or
- Ten years, in all other cases. The maximum term described above applies to any member of the family who:
- Has an ownership interest in the unit during the time that homeownership payments are made; or
- Is the spouse of any member of the household, who has an ownership interest in the unit during
 the time homeownership payments are made. In the case of an elderly family, the exception only
 applies if the family qualifies as an elderly family at the start of homeownership assistance. In the
 case of a disabled family, the exception applies if at any time during receipt of homeownership
 assistance the family qualifies as a disabled family. If, during the course of homeownership
 assistance, the family ceases to qualify as a disabled or elderly family, the maximum term becomes
 applicable from the date homeownership assistance commenced. However, such a family must be
 provided at least 6 months of homeownership assistance after the maximum term becomes
 applicable (provided the family is otherwise eligible to receive homeownership assistance). If the
 family has received such assistance for different homes, or from different PHAs, the total of such
 assistance terms is subject to the maximum term described in this part.

HOMEOWNERSHIP ASSISTANCE PAYMENTS AND HOMEOWNERSHIP EXPENSES [24 CFR 982.635]

The monthly homeownership assistance payment is the lower of the voucher payment standard minus the total Resident payment, or the monthly homeownership expenses minus the total Resident payment. In determining the amount of the homeownership assistance payment, the PHA will use the same payment standard schedule, payment standard amounts, and subsidy standards as those described elsewhere in this plan for the Housing Choice Voucher program. The payment standard for a family is the greater of (i) The payment standard as determined at the commencement of homeownership assistance for occupancy of the home, or (ii) The payment standard at the most recent regular re-examination of family income and composition since the commencement of homeownership assistance for occupancy of the home. The PHA may pay the homeownership assistance payments directly to the family, or at the PHA's discretion, to a lender on behalf of the family. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family. Homeownership assistance for a family automatically terminates 180 calendar days after the last homeownership assistance payment on behalf of the family.

However, a PHA may grant relief from this requirement in those cases where automatic termination would result in extreme hardship for the family. The PHA must adopt policies for determining the amount of homeownership expenses to be allowed by the PHA in accordance with HUD requirements.

Homeownership expenses (not including cooperatives) only include amounts allowed by the PHA to cover:

- Principal and interest on initial mortgage debt, any refinancing of such debt, and any mortgage insurance premium incurred to finance purchase of the home
- Real estate taxes and public assessments on the home
- Home insurance
- The PHA allowance for maintenance expenses
- The PHA allowance for costs of major repairs and replacements
- The PHA utility allowance for the home
- Principal and interest on mortgage debt incurred to finance costs for major repairs, `replacements
 or improvements for the home. If a member of the family is a person with disabilities, such debt
 may include debt incurred by the family to finance costs needed to make the home accessible for
 such person, if the PHA determines that allowance of such costs as homeownership expenses is
 needed as a reasonable accommodation so that the homeownership option is readily accessible to
 and usable by such person.
- Land lease payments where a family does not own fee title to the real property on which the home is located; [see 24 CFR 982.628(b)].
- For a condominium unit, condominium operating charges or maintenance fees assessed by the condominium homeowner association. Homeownership expenses for a cooperative member may only include amounts allowed by the PHA to cover:
- The cooperative charge under the cooperative occupancy agreement including payment for real estate taxes and public assessments on the home.
- Principal and interest on initial debt incurred to finance purchase of cooperative membership shares and any refinancing of such debt.
- Home insurance.
- The PHA allowance for maintenance expenses
- The PHA allowance for costs of major repairs and replacements
- The PHA utility allowance for the home; and
- Principal and interest on debt incurred to finance major repairs, replacements, or improvements for the home. If a member of the family is a person with disabilities, such debt may include debt incurred by the family to finance costs needed to make the home accessible for such person, if the PHA determines that allowance of such costs as homeownership expenses is needed as a reasonable accommodation so that the homeownership option is readily accessible to and usable by such person.
- Cooperative operating charges or maintenance fees assessed by the cooperative homeowner association.

PORTABILITY [24 CFR 982.636, 982.637, 982.353(b) and (c), 982.552, 982.553] Subject to the restrictions on portability included in HUD regulations and PHA policies, a family may exercise portability if the receiving PHA is administering a voucher homeownership program and accepting new homeownership

families. The receiving PHA may absorb the family into its voucher program or bill the initial PHA. The family must attend the briefing and counselling sessions required by the receiving PHA. The receiving PHA will determine whether the financing for, and the physical condition of the unit, are acceptable. The receiving PHA must promptly notify the initial PHA if the family has purchased an eligible unit under the program, or if the family is unable to purchase a home within the maximum time established by the PHA.

A family receiving homeownership assistance may move with continued Resident-based assistance. The family may move with voucher rental assistance or with voucher homeownership assistance. Continued Resident-based assistance for a new unit cannot begin so long as any family member holds title to the prior home. The PHA may deny permission to move to a new unit with continued voucher assistance:

- If the PHA has insufficient funding to provide continued assistance
- In accordance with 24 CFR 982.638, regarding denial or termination of assistance
- In accordance with the PHA's policy regarding number of moves within a 12- month period. The PHA must deny the family permission to move to a new unit with continued voucher rental assistance if:
- The family defaulted on an FHA-insured mortgage; and
- The family fails to demonstrate that the family has conveyed, or will convey, title to the home, as required by HUD, to HUD or HUD's designee; and the family has moved, or will move, from the home within the period established or approved by HUD.

DENIAL OR TERMINATION OF ASSISTANCE [24 CFR 982.638]

At any time, the PHA may deny or terminate homeownership assistance in accordance with HCV program requirements in 24 CFR 982.552 (Grounds for denial or termination of assistance) or 24 CFR 982.553 (Crime by family members). The PHA may also deny or terminate assistance for violation of participant obligations described in 24 CFR Parts 982.551 or 982.633 and in accordance with its own policy, with the exception of failure to meet obligations under the FSS program as prohibited under the alternative requirements set forth in FR Notice 12/29/14. The PHA must terminate voucher homeownership assistance for any member of family receiving homeownership assistance that is dispossessed from the home pursuant to a judgment or order of foreclosure on any mortgage (whether FHA insured or non-FHA) securing debt incurred to purchase the home, or any refinancing of such debt.

COMMUNITY SERVICE AND SELF-SUFFICIENCY PROGRAM

Community Service and Self-Sufficiency Program

VIHA continues building its resident services department with ongoing service coordination and the Bright Path family economic mobility plan. The "Department of Resident Wellness and Empowerment" combines traditional Family Self-Sufficiency functions, collaborative partnerships, and the leveraging of services to energize a comprehensive approach to connecting residents to the services and resources necessary for facilitating positive outcomes and economic mobility for each household.

VIHA's long-term goal is to significantly improve the lives of its residents and the households in which they live. All resident engagement efforts will promote opportunities for residents to actualize financial wellness, increased income, better health, and emphasis on whole-person wellness, elimination of food insecurities; improved adult literacy and education attainment; allow residents to foster inclusion and be

active and engaged in the community.

The Department of Resident Wellness & Empowerment (RWE) will facilitate resident input into ongoing program design that will drive:

- High-performing youth and workforce readiness
- Healthier residents and communities
- Economically stable residents
- An engaged community of citizens maintaining beneficial relationships, and safer communities.

Focusing on the department's service plan is essential to continued success. Leadership will ensure the successful incorporation and use of existing resources and staff to collect data that develop and target service plans to identify partnerships and access points for community services. Also, the Family Self-Sufficiency (FSS) Program will be a focal point for facilitating positive financial outcomes for VIHA residents' economic goals. Additionally, departmental policies, procedures, and operations manuals will drive the second phase of resident wellness services. The goal of the second phase is to increase awareness and access to services for residents. RWE department will intensely focus on implementing BP Academic and Wellness centers in communities' territory wide. RWE is finalizing grants and procurement of services to build innovative wellness spaces that support physical, mental, and academic wellness. Maintaining effective community resident council collaboration will be instrumental in ensuring that residents connect to the necessary services and resources. Finally, stabilizing the department's mission-results service model will provide a departmental structure that sustains its effectiveness, efficiency, accountability, and team.

BRIGHT PATH UPDATE

In 2022, VIHA launched the Bright Path program to replace the agency's resident offering. Bright Path is a support model promoting residents' health and wellness, housing stability, economic mobility, and personal self-sufficiency.

Over the last year, the RWE team has worked to build the program's foundation, which is rooted in eight (8) dimensions of wellness – emotional, financial, intellectual, vocational, social, physical, environmental, and spiritual.

The RWE team created a structure, secured resources, and collected data to build a group of partners and stakeholders. Together with our community and housing redevelopment partners, we aim to develop a network and collaborative system to implement resources to the community and build strong partnerships for continued growth and housing transformation.

Stakeholder priorities:

- (1) Marginalized Populations: need support immediately, systemizing the housing needs of residents with significant barriers.
- (2) Streamlined Communication: Develop a communication system around what type and how many vouchers are available and distributed; prioritization.
- (3) Emergency & Permanent Housing: Establish more housing options; alternatives for housing people in the short-term and long-term; create a committee to address.

(4) Resident and Community Safety:

Oswald Harris Court: Dismantling unidentified/unapproved tenting and food truck. The community is concerned about dangerous activity conducted after operational hours.

- (5) Spiritual Wellness: Implementation via the Bright Path Program focusing on children and youth. Continue a partnership for families.
- (6) Empower the Resident Councils: Expand and build more active Resident Councils in more communities. Incorporate operation, leadership, and advocacy training, within VIHA Resident Council quarterly review.
- (7) Infrastructure & Support for People Experiencing Homelessness: Reinforce the Coordinated Entry System and partnering to support the Continuum of Care (CoC) Staff.
- (8) Community Centers to Implement Wellness & Education Support: Virtual workforce development certification for young adults; tutoring for Bright Path Holistic Wellness initiative, VIHA is currently working to deploy \$900K Appropriations Funding through Representative Plaskett under HUD & Economic Development Initiative (to fund wellness centers & after-school academic sites in (2) STT & (1) STX)

Family Self-Sufficiency (FSS) Program

The Family Self-Sufficiency (FSS) Program is a voluntary program serving a minimum of 25 Low Income Public Housing (LIPH) and Housing Choice Voucher Program (HCVP) families. The Virgin Islands Housing Authority's (VIHA) Family Self-Sufficiency Program (FSS) received renewed funding from the Department of Housing and Urban Development (HUD) for fiscal year 2023. VIHA appreciates the assistance of the Program Coordinating Committee (PCC) partners to ensure the success of FSS program participants as they strive to become economically self-sufficient. The PCC is a mandatory part of implementing an FSS program and is vital to the success of the FSS program and its participants. With community stakeholders' support, education, and intervention, sustained long-term success becomes increasingly more accessible.

Infrastructure & Support for People Experiencing Homelessness

VIHA 2024 Plan reflects the commitment to assist individuals and families facing housing instability. We envision a comprehensive approach to address homelessness in the Virgin Islands. Families seeking assistance must be referred by their respective agencies to VIHA, where their eligibility will be assessed based on program criteria. We are streamlining the referral process with the COC to increase access to all special voucher programs and initiatives. The plan highlights the referral process for special vouchers managed by the Housing Choice Voucher Program (HCVP) to ensure efficient and equitable access to these resources. VIHA provides equitable access to housing resources, and our ongoing efforts reflect our commitment to building more robust, more resilient communities.

HCVP/Special Vouchers/support Homeless Populations

• **Referral Process for Special Vouchers:** The importance of a streamlined referral process ensures equitable access to eligible families and individuals need to specialized housing assistance promptly. Referrals for special vouchers, including Foster Youth to Independence (FYI), Emergency Housing Vouchers (EHVs), and Veterans Affairs Supportive Housing (VASH) Vouchers, are facilitated through the collaboration of VIHA and state Continuum of Care (COC) partner agencies. Recognizing the limitations of our current resources and capacity, VIHA will develop a strategic approach that leverages external expertise and policy adjustments to support the homeless population effectively. This approach aims

to streamline housing voucher referrals and enhance accessibility to housing options while focusing on inclusivity and fair access.

- **Collaboration for Housing Voucher Referral allocation:** VIHA acknowledges the challenges posed by limited resources within the Authority. Therefore, will work to identify expertise in supportive housing solutions that will facilitate the development and efficient allocation of housing resources to individuals in need. Strategic referral processes will ensure the state has access to specialized vouchers, improving VIHA's capacity to provide timely assistance to the homeless population throughout the territory.
- Policy Adjustments and Operational Policy Language Intent: VIHA recognizes the significance of policy adjustments to accommodate the unique needs of the homeless population. VIHA will review and modify the operational policy and the Administrative Plan of Operational Policy (ACOP). VIHA aims to mitigate barriers posed by outdated background check regulations. By enabling individuals with specific types of criminal records in the territory to access housing options under the Public Housing Authority (PHA) and HCVP programs, VIHA aligns with HUD's vision of inclusivity and equitable access.
- **Promotion of Fair Share Remedies and Incentives:** VIHA recognizes the vulnerability of specific populations, including homeless individuals, domestic violence victims, senior citizens, and people with disabilities. VIHA proposes advocating state officials for fair share remedies that offer tailored incentives for Property Owners, Landlords, and Multi-unit developers willing to house special voucher holders. Incentives advocacy catering to each district's unique needs, VIHA aims to foster the increased number of available housing options for participants through successful integration into stable housing environments, promoting long-term well-being and self-sufficiency.

Safety and Crime Prevention

VIHA has embarked on a journey to enhance the safety and security of its public housing communities through the strategic use of technology and collaborative partnerships. This document outlines VIHA's commitment to this mission and the measures taken to achieve it.

VIHA recognized the need to improve safety within its public housing communities, leading to the implementation of a phased project involving the installation of Closed Circuit TV (CCTV) cameras. These cameras provide valuable surveillance information aimed at enhancing safety for all residents.

In 2024-2025, VIHA plans to extend its surveillance systems to include the following communities: Michael J. Kirwan Terrace, Lucinda Millin Home, Knolls at Contant, and Estate Bovoni. This expansion demonstrates VIHA's dedication to ensuring the safety and security of residents across various housing complexes.

VIHA acknowledges the importance of a collaborative effort in achieving its safety objectives. To complement the technological advancements, VIHA is actively advocating for additional manpower from the Virgin Islands Police Department (VIPD). This additional support is crucial for the full implementation of community policing within public housing communities.

The VIPD has acknowledged the value of the CCTV systems installed within VIHA's properties. These systems have proven instrumental in assisting law enforcement with resolving criminal activities and addressing altercations. VIHA is proud to contribute to the safety efforts of the VIPD.

In addition to technology and law enforcement collaboration, VIHA has initiated and will continue to work closely with the VIPD's Crime Prevention Unit. Together, they are developing programs and activities that foster on-site interaction with residents and children within public housing communities. These initiatives aim to strengthen community bonds and improve overall safety.

VIHA's unwavering commitment to safer communities is evident through its nonviolence initiatives. By forging strategic collaborations with a consortium of local non-profit organizations, public sector entities, and law enforcement agencies, VIHA is demonstrating its dedication to addressing violence collectively.

VIHA recognizes the significance of infrastructure in creating a secure environment. Investment in enhanced lighting and the installation of CCTV cameras in specific communities not only addresses immediate safety concerns but also lays a solid foundation for the long-term betterment of these communities.

VIHA's commitment to the safety and security of its public housing communities is resolute. Through the strategic use of technology, collaboration with law enforcement, community engagement initiatives, and a dedication to nonviolence, VIHA aims to provide a sense of security and an improved quality of life for all residents. Together with its partners, VIHA is building a safer, more vibrant future for its communities.

Asset Management

Annual Inspections

The Virgin Islands Housing Authority will move to quarterly inspections for all public housing units. This will assist in minimizing the turnaround days once the unit becomes vacant. Additionally, the frequency of the inspections will help minimize the amount of open work orders the unit generates as many of the deficiencies will be captured and resolved during the scheduled inspection.

Additionally, the Department of Asset Management is looking to implement various software systems such as text box to its housing software, as well as programs that allow for on-line recertification processes by January 1, 2024. The text box system provides email and voice messaging as a means to communicate important information quickly. The text box system allows for the property management team to notify residents via text messages about warnings, upcoming events, and meeting updates. The identified software system will also allow prospective applicants to be able to make changes to their accounts to update information as needed. This will give residents more flexibility in submitting their re-certifications.

Rent Determination – (Housing Opportunity Through Modernization Act of 2016 (HOTMA))

Under HOTMA, when a household's income exceeds 120 percent (120%) of Area Median Income (AMI) for twenty-four (24) consecutive months, housing authorities have the option to either evict them or offer them a new lease with the rent being the greater of the Fair Market Rent (FMR) or an amount of monthly subsidy for their unit including amounts from the operating and capital fund (the subsidy amount). VIHA has chosen to allow these households to remain in public housing, paying higher rent. HUD finalized HOTMA rulemaking in 2023 to put Sections 102, 103, and 104 into effect through revisions to HUD's regulations found in 24 CFR Part 5 and 24 CFR Part 891. The implementation date of the HOTMA provisions

will be January 1, 2024. Owners may not implement these provisions prior to their effective dates. The effective date for VIHA is November 1, 2023.

HUD delayed compliance for Sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) Final Rule until January 1, 2025, although PHAs will still need to implement the HOTMA Section 103 with the amendment to the Admissions and Occupancy Policy (ACOP) by January 1, 2024.

The Virgin Islands Housing Authority (VIHA) is committed to continuous improvement and staying aligned with federal regulations and guidelines. In response to the Housing Opportunities Through Modernization Act (HOTMA), VIHA proposes several critical amendments to our policies and procedures to enhance the effectiveness of our FSS program and ensure compliance with the new regulations. VIHA proposed changes incorporated into the VIHA Administrative Plan (ACOP) and the Family Self-Sufficiency (FSS) Action Plan. VIHA will work closely with legal counsel, stakeholders, and our resident community to ensure a seamless transition and clear communication of these changes. The updated ACOP will be disseminated to all program participants, outlining the adjustments and guiding the implementation process.

- 1. Annual Income Recertifications: VIHA will conduct annual income recertifications for FSS participants based on the previous year's income. This adjustment ensures that HOTMA requirements accurately reflect FSS participant incomes.
- 2. Interim Income Recertifications: update language in the FSS action plan to state, "FSS participants can only request interim income recertifications if their income changes by +/- 10%." This provision balances between ensuring accurate income data and minimizing administrative burden.
- 3. **Phasing Out of Earned Income Disallowance (EID):** VIHA will phase out the Earned Income Disallowance policy. This change aligns with HOTMA and simplifies income calculations for program participants.
- 4. **Family Self-Sufficiency (FSS) Program:** FSS distributions will be exempt from being listed as income or asset, offering participants greater flexibility and motivation to engage in income-improvement activities without concerns of affecting their housing assistance.

Proposed Housekeeping Standards Policy

To improve the liveability and conditions of the dwellings owned by the Virgin Islands Housing Authority (VIHA), uniform standards for resident housekeeping have been developed for all resident households. The Housekeeping Standards will be applied fairly and uniformly to all Residents. The method to do this will include interaction with the Resident Wellness & Empowerment (RWE) Division, Virgin Islands Housing Authority (VIHA) Manager(s) and the resident. Residents are required to abide by the standards set forth.

Residents may be required to pay fines and face eviction due to housekeeping violations. Residents will be given a reasonable amount of time to rectify any violations.

1. The resident is responsible for keeping the unit and area in the same condition as at move-in, excluding what is generally considered normal wear and tear.

2. The VIHA will not be liable for damages caused by the criminal acts of the resident, the resident's guests, invitees, or other people.

3. The VIHA will collect the reasonable cost of repairs from the Resident for any damages caused by the Resident, family or household members, Resident's pet(s), guests, or other person under the Resident's control. The reasonable cost of the repairs shall be charged to the Resident and, in cases of severe damage, may result in the eviction of the household.

A. RESIDENT'S OBLIGATIONS

Every member of the Resident's household is jointly and severally obligated to abide by the Housekeeping Standards to:

1. Keep their unit and Community clean, safe, and sanitary.

2. Use the electrical, plumbing, heating, and other major systems in the unit and the Community reasonably, safely, and sanitary.

3. Not make vehicle repairs or park inoperable, unlicensed, uninsured, or junk vehicles in or around the Community.

4. Promptly report any problems with major systems, excessive damage, and safety devices.

5. Not dispose of vehicle batteries, tires, or hazardous materials in or around the Community.

6. Use containers (chosen or approved by VIHA) to dispose of garbage, trash, oil, and ashes from the resident's unit in a sanitary and safe manner.

7. Pay reasonable charges for repairs to a resident's unit or Community that are beyond normal "wear and tear" and caused by Resident household members, visitors, guests, and invitees.

Inside of Unit:

- a. The unit is clean and free of dirt or grease.
- b. Excessive mildew and mold have been removed.
- c. Floors are clean, dry, and hazard-free.
- d. Trash is securely bagged, disposed of properly, and not left in the unit.
- e. Storage and cleanliness do not contribute to rodent or insect infestations.
- f. The kitchen is grease- and spilled food-free.
- g. Appliances are clean and in working condition.
- h. Cabinets are clean, neat, and not overloaded.
- i. Stove is clean and free of grease.
- j. The refrigerator is clean and defrosted regularly.
- k. No flammable materials are stored in the unit.
- I. Entrance, hallways, and exit pathways provide clear access and are free of blockage.
- m. Toilets and tanks are clean and odor free.
- n. Tub, sink, and shower are clean and free of mildew and mold.
- o. Exhaust fans are free of dust.
- p. All closets are neat and clean.
- q. Storages areas are clean, neat, and free of hazards.

Outside Unit and Community:

The following standards apply to family and scattered site development only; some standards apply only when the area noted is for the exclusive use of the resident.

a. Yards: These shall be free of debris, trash, toys, non-powered vehicles, and abandoned cars. Exterior walls shall be clean and free of graffiti.

- b. Living room furniture cannot be used or stored on porches unless it is outdoor-friendly.
- c. No hanging or sticking things on outdoor walls without permission
- d. Steps (front and rear) of unit: shall be swept and hazard-free.
- e. Sidewalks shall be clean and hazard-free.
- f. Parking lot shall be free of abandoned cars. There shall be no car repairs on the lots that cannot be completed in one day (e.g., changing a flat tire, switching a battery).
- g. No vehicles with hazardous leaks (i.e., gas, oil, brake fluid, and transmission fluid) may be parked on the VIHA property.
- h. Hallways shall be clean and free of hazards.
- i. Stairwells shall be clean and uncluttered.
- j. Laundry areas shall be clean and neat, and the dryer lint screen cleaned after use.
- k. Utility rooms shall be free of debris, motor vehicle parts, and flammable materials.
- I. Porches and stoops (front and rear): shall be clean and free of hazards. Any items stored on the porch shall not impede access to the unit.
- m. Exterior storage units are forbidden on VIHA property.

B. Inspection Frequency

Unit Inspections occur annually unless the resident is deemed high risk and requires more frequent inspections.

1. When it is time to inspect, the VIHA shall give residents at least forty-eight (48) hours written unless there is an emergency.

2. VIHA may enter the resident's dwelling unit at any time without advance notification when there is reasonable cause to believe that an emergency exists that poses an immediate threat to the safety or welfare of residents or employees.

3. On the inspection day, the VIHA will use the inspection checklist to provide the Resident with a pass/fail rating.

C. Failed Inspection

A follow-up inspection will occur within two weeks of an initial failed inspection.

1. If the unit fails again, a third inspection will occur in thirty (30) days, and residents must complete a personal wellness assessment with the RWE division before the 30-day follow-up inspection.

2. If the unit fails the third inspection, the Resident will receive a lease termination notice immediately, and eviction proceedings will begin for non-compliance.

3. Inspections may occur whether the Resident is home or not. Failure to permit inspection is a serious violation and grounds for termination.

D. Notice for Housekeeping Violation

1. The VIHA will conduct a housekeeping inspection of the unit annually or as frequently as necessary in accordance with the policy. At the end of the inspection, each resident participating in the walkthrough must sign the inspection form.

2. The Resident may submit a written statement if he or she disagrees with outcome of the housekeeping inspection and request.

3. The VIHA will notify the Resident, in writing, of the lease violation indicating the reason or reasons for the breach, and the effective date of the follow-up inspection. The notification will include the name of the RWE coordinator assigned to the AMP to conduct the follow-up inspection and wellness assessment.

4. After reasonable advance notice to the Resident, the RWE coordinator will reinspect the unit to verify that the housekeeping violation is corrected. Failed follow-up inspections are a lease violation and may result in lease termination.

5. The Resident may utilize the VIHA grievance process to dispute the decision of lease termination.

Substantial Deviation

A "substantial deviation" to VIHA's Five-Year Plan or Restated Five-Year Plan (collectively referred to as the "Five-Year Plan") and Annual Plan is defined as any substantial change, modification, or amendment to the Five-Year Plan that materially and significantly modifies VIHA's goals listed in any section of the Five-Year Plan. A change in VIHA's objectives or strategies in reaching those goals will not be considered a "substantial deviation" or "significant amendment or modification." Other than for "substantial deviation" or "significant or modifications," as defined above, VIHA may make changes to its Five-Year Plan without the necessity of re-submitting the entire Five-Year Plan document, conducting a public hearing, or otherwise engaging in Five-Year Plan Resident Advisory Board consultation or other resident consultation.

Significant Amendment/Modification

The following actions will be considered a Significant Amendment or Modification to the Five-Year and Annual Plan:

- A change that would significantly alter rent or admission policies of VIHA's waiting lists.
- A significant addition of emergency or non-emergency work items not included in the Capital Fund Program Annual Statement(s)
- An exception to this definition will be made for any new activities that are adopted to reflect changes in HUD regulatory requirements or as result of a declared emergency (such changes will not be considered significant amendments or modifications by VIHA)
- Any proposed demolition, disposition, homeownership, Capital Fund Financing, development, mixed-finance, or RAD projects not identified in the Plan.

Section B2: New Activities

HOPE VI or Choice Neighborhoods

VIHA will retain the option to apply for HUD's Choice Neighborhood Planning and Implementation Grants if funding and timing is appropriate.

Choice Neighborhood Planning Grant

VIHA and the St. Croix Foundation for Community Development, with the support of the Virgin Islands Office of the Governor, applied for a Choice Neighborhood Planning Grant with the U. S. Department of Housing and Urban Development (HUD) but was not selected. Thus, it is VIHA's intention to resubmit for another Choice Neighborhood Planning Grant for the Marley Homes/Marley Additions site in 2024.

This shared vision with the community to conduct a planning effort with a committed team of partners, residents, and stakeholders to create an innovative yet achievable plan for the transformation of Frederiksted - Freedom City: Past, Present, and Future.

HUD's approval of this Choice Neighborhood Planning Grant application will allow us to create a shared vision to restore, champion, and enhance the rich history and social fabric which is Freedom City for the benefit of all in FY2024.

Mixed-Finance Modernization or Development

VIHA is continuously reviewing its Public Housing Portfolio to determine suitability of available funding and redevelopment opportunities. As such, all VIHA's units will be reviewed for mixed finance potential or HUD's RAD program on an ongoing basis. VIHA has identified development partners and consultants to assist with these efforts.

VIHA has identified the following sites: Wilford Pedro Home, D. Hamilton Jackson Terrace, Alphonso "Piggy" Gerard, John F. Kennedy Terrace, Nicasio Nico Apartments, Ludvig E. Harrigan Court, Mt. Pleasant, Joseph E. James Terrace, Marley Homes, and Additions and Williams Delight as priority redevelopment sites on St. Croix. On St. Thomas, the redevelopment of the Estate Tutu Hi-Rise Apartments is planned in three (3) phases at three (3) different site locations. These locations include two existing Estate Tutu Hi-Rise sites (Tutu North and Tutu South) and the Donoe site.

VIHA has engaged Developer Partners for the John F. Kennedy Terrace on St. Croix and the Estate Tutu Hi- Rise Apartments on St. Thomas. The redevelopment of John F. Kennedy Terrace will provide the opportunity to serve as a catalyst to the redevelopment of the Christiansted area, including the transfer of the Ralph deChabert property to the territory in exchange for buildable land. The redevelopment of the Estate Tutu Hi-Rise would provide the opportunity for the expansion of new and more resilient affordable housing developments. This redevelopment strategy will incorporate the assistance of the RAD program, Low-Income Housing Tax Credits, and other housing subsidies such as project-based vouchers to support the redevelopment and operational funding needed.

As an integral part of VIHA's Portfolio Repositioning Strategy, VIHA will consider the sale of any asset and purchase of any new land that will support the plan.

HUD has approved a RAD Portfolio Award to VIHA for 1,282 units. A Portfolio Award allows public housing authorities to reserve RAD conversion for a set of projects. The agency has CHAPs for John F. Kennedy Terrace – 200 units, Joseph James - 34 units, Wilford Pedro – 97 units, Walter I.M Hodge- 248 units. In addition, up to 1,698 units will be converted to project-based vouchers or project-based rental assistance under RAD per VIHA's Repositioning Strategy. The following table list these proposed RAD projects.

On June 10, 2022, VIHA along with its development partner, MDG Design + Construction closed on the Walter I. M. Hodge Revitalization Project – VIHA's 1st HUD approved RAD project.

\$116.7 million Rehabilitation Project - Developer: MDG Design + Construction Owner: Walter I.M. Hodge RAD LLC

One-bedroom units -36 Two-bedroom units - 89

Three-bedroom units -87 Four-bedroom units – 36

Project upgrades includes new kitchen and bath fixtures and cabinets, new plumbing and electrical systems, appliances, and flooring and painting. In addition, there will be substantial storm hardening measures including the installation of a new façade system incorporating new hurricane-wind resistant windows and louver systems, and entry doors and storefronts.

There will also be new site beautification measures, which will include placing new electrical lines underground, new site signage, landscaping, redesigned pedestrian walkways/seating areas and recreational facilities including a playground, upgraded basketball courts, and community gardening/planting boxes, as well as improved and increased parking throughout.

The project will include vastly improved community spaces including a renovated community center/property office building, featuring a computer room and library. The project will also include a new senior center to accommodate the needs of residents (utilizing two (2) existing residential units to be transformed for this community space).

The renovations are designed to meet the construction requirements of National Green Building Standards, Tropical Climate Path. The new apartments do not currently have and are not designed to have HVAC but will incorporate sustainable green features such as Energy Star appliances and ceiling fans, LED lighting, low- water usage fixtures, and highly efficient right sized electric water heaters. Additional resiliency measures include solar PV and re-establishing the cisterns and backup generators for shared area lighting and the ancillary community center/site office.

Bright Path, a robust RWE Plan created by VIHA, will be implemented to provide support and services to the residents with long-term funding included in the project budget.

Financing for the project includes \$49.9 million in funding from VIHA utilizing FEMA Public Assistance and Hazard Mitigation Grant Programs and \$22.65 million from VIHA utilizing HUD's Community Development Block Grant-Disaster Recovery Program. The project received 9% Low Income Housing Tax Credits allocated by the Virgin Islands Housing Finance Authority, which, along with the Solar Investment Tax Credit, will yield an equity investment of \$27.56 million from Goldman Sachs Bank. Additionally, Merchants Bank of Indiana is providing a construction loan in the amount of \$28.50 million.

The Virgin Islands Housing Authority (VIHA) has made an offer to purchase the general partner ownership interest in Sugar Estates Associates, LP, the note receivable interest held by Continental Mortgage Corporation (an affiliate of the GP), and the developer fee receivable interest owed to Michael Development Company I, L.P. VIHA desires to maintain as much affordable housing as possible given the scarcity of such housing on the islands.

VIHA will continue to evaluate the option of acquiring other affordable housing developments that would allow VIHA to utilize its Faircloth Limit of 4,127. The Faircloth-to-RAD strategy will also be evaluated as an option to convert a property to a long-term Section 8 contract following acquisition or rehabilitation/construction.

Below is a list of the VIHA properties on the Island of St. Thomas and St. Croix that are included in the agency's Portfolio Repositioning Strategy with a summary of each site's status.

St. Thomas	DoFA	Current	Demo	New Const	Final Units	ACC	RAD	PBV	LIHTC Only/RAD/	Final Units
		Units							Sec 18	
Estate Tutu	1974	304	(304)	154	154		0	154		154
Oswald Harris Court	1963	298	(16)		282		282			282
Oswald Senior		0			0			0		0
Donoe Family		0		84	84			84		84
Estate Bovoni	1973	366			366		366			366
Paul M. Pearson	1954	120	(120)	80	80			80		80
H. H. Bergs / Addition	1957	74	(74)	74	74			74		74
Lucinda Millin Home	1970	85	(85)	85	85			85		85
Michael J. Kirwan	1970	126	(126)	126	126			126		126
The Knolls at Contant	1998	96			96	0	96			96
St Thomas Totals		1,469	-725	603	1,347	0	744	603	0	1,347
St. Croix	DoFA	Current Units	Demo	New Const	Final Units	ACC	RAD	PBV	IA/Section 18 Blend	Final Units
D. Hamilton Jackson	1954	110	0	0	110		110		0	110
Alphonso Gerard	1957	26	0	0	26		26		0	26
John F. Kennedy	1966	200	(200)	200	200		200		0	200
Wilfred Pedro (Stony Ground)	1971	98	(98)	98	98		98		0	98
Ralph deChabert Sr.	N/A	0	0							0
Joseph E. James	1984	34	0	0	34		34			34
Aureo Diaz Heights	1970	125	(100)	125	125		100		25	125
Mount Pleasant	1973	44	(44)	46	46		44	0	2	46
Candido Guadalupe	1974	90	(90)	90	90			90		90
Marley Homes	1957	34	0	0	34		34	0	0	34
Marley Addition	1968	60	0	0	84		60	0	24	84
Ralph deChabert	1971	0	0	0	0		0		0	0
Walter IM Hodge	1971	250	(2)	0	248		248			248
William's Delight	1973	278	(178)	0	100	100	0			100
Mon Bijou		2	0	0	2	2				2
Nicasio Nico	1974	60	(60)	60	60		0	60		60
Ludvig Harrigan	1960	70	(70)	70	70		0	70		70
LEB I/II	2011/12	87	0	0	87	87				87
LEB III	2019	0	0	90	90			90		90
St. Croix Totals		1,568	-842	779	1,504	189	954	310	51	1,504
Grand Totals	1	3,037	(1,567)	1,382	2,851	189	1,698	913	51	2,851

VIHA has developed a Repositioning Strategy that calls for the rehabilitation or new construction of more than 3,000 public housing units through a variety of repositioning strategies, including RAD, standard project-based assistance, Section 18 demolition, and public housing homeownership.

These developments, except for William's Delight, will be financed with either 4% or 9% Low-Income Housing Tax Credit proceeds. William's Delight will be developed as homeownership units under the HUD Section 5(h) Homeownership Program. VIHA has entered into a Master Development Agreement (MDA) with

three developers. The Richman Group (TRG) was recently terminated for convenience. VIHA will issue an RFP to create a pool of qualified developers to implement the projects previously assigned to TRG.

Below is a list of the VIHA properties that are included in the agency's Portfolio Repositioning Strategy with a summary of each site's status.

Developer Selection

VIHA selected three developers – MDG, TRG, and Pennrose to serve as developers of the St. Croix developments. MDG was chosen to develop Walter I.M. Hodge Pavilion, D. Hamilton Jackson, Alphonso Gerard, William's Delight, and John F. Kennedy. Pennrose was chosen to develop Tutu High-rise, Nicasio Nico and Ludvig Harrigan. TRG was selected to develop Ralph deChabert, Marley and Marley Homes Additions, Mount Pleasant, Aureo Diaz Heights, and Wilford Pedro; however, a new RFQ for a developer for these projects will be solicited. TRG is no longer one of our developer partners.

A brief narrative of each of the proposed redevelopment sites is provided below.

Estate Donoe, (Estate Tutu offsite Replacement Housing Phase 1) -

This project is the first phase of three phase development aimed at replacing the Tutu Public Housing Development that was irreparably damage by Hurricanes Marilyn, Irma, and Maria. The Phase 2 and Phase 3 will be discussed below.

Site: Estate Donoe is approximately 17.5-acres located at No. 2 New Quarter, St. Thomas, USVI 00802, containing parcels Nos. 3A, 3B-1, B-2, and 3B Estate Donoe. The site has heavy vegetation, and irregular in shape with varied steep grading conditions, all the improvements remaining because of the hurricanes have been demolished leaving only two existing roads on site. All public utilities are available with sufficient capacity to support the proposed apartments. According to the Federal Emergency Management Agency's Flood Hazard Map, panel number 780000028G, dated April 16, 2007, the property is in Zone "X", which is a determination to be outside the 0.2 percent annual chance floodplain. Site improvements will include, but are not limited to, parking, sidewalks, site lighting, a potable water cistern, all necessary utility distribution systems, trash enclosures, tot lots, landscape, and site irrigation.

Location: The site is surrounded by a blend of single and multi-family residential homes and is near a network of assets, including schools, the public library, retail, pharmacies, grocery shopping and banks. The site is easily accessed by public transportation and by car to the island's major thoroughfares.

Construction/Scope of Work: The new affordable apartment buildings will be constructed with slab on grade and concrete masonry foundation walls on concrete spread footings. The exterior walls will be constructed with concrete block and have a stucco finish and all buildings are being designed to meet the

construction requirements of Enterprise Green Communities. The new apartments will incorporate sustainable green features such as solar panels, energy star appliances and light fixtures/ceiling fans, low-water usage fixtures, occupancy sensors for shared areas and community spaces, solar water heaters in townhomes, and metered connections for air conditioning units in the bedrooms of each apartment. Hurricane resilient building techniques will be applied, which includes a micro-turbine energy system so that the property is not reliant on the Island's electrical grid. Planned project amenities include indoor and outdoor community space. The plans incorporate sustainable design standards and local architectural influences that integrate the development within the greater neighborhoods. The sites will comply with all federal accessibility requirements.

Development Costs/Funding: The total development cost for the Estate Donoe development is \$71.3 million. Pennrose received a 9% LIHTC award of \$3.4 million on December 27, 2019, from the VIHFA. The project includes a \$34 million CDBG-DR commitment. All apartments will be subsidized by project-based vouchers. The original contractor was terminated from the project and a new contractor has been selected to restart the project. This has delayed the construction completion date to December 2024. Additional CDBG-DR funding will be needed.

Estate Tutu North Redevelopment Project - Phase I (Tutu Phase II)

Construction Scope of Work: Phase I of the Tutu North will consist of the construction of 60 senior units. Master planning for this phase has begun. The preliminary plan calls development one six story senior building. The projected cost for Tutu North is \$64.0 million.

The Senior units would be one project with a preference for age restriction in the senior building. Financing for this phase will include: 9% LIHTC, FEMA, project-and project- based rental subsidies.

Timeline: The developer is in master planning process. Financing structuring has also commenced. The financial closing is projected for 4th quarter of 2023.

Estate Tutu North Redevelopment Project - Phase II (Tutu Phase III)

Construction Scope of Work: Phase I of the Tutu North will consist of the construction of 92 family units. Master planning for this phase has begun. The preliminary plan calls development three multi-family buildings, and one community building. The projected cost for Tutu North is \$80.0 million.

The Family units will be financing for this phase will include: 4% LIHTC/tax-exempt bonds, FEMA, projectand project- based rental subsidies.

Timeline: The developer is in master planning process. Financing structuring has also commenced. The project will include tax-exempt bonds. The financial closing is projected for 2nd quarter of 2024.

D. Hamilton Jackson Terrace

Site: This development consists of 110 public housing units situated in the Richmond community of Christiansted. The property was built in 1952. The physical address of the property is 7 Estate Richmond, Christiansted, St. Croix: and

Alphonso "Piggy" Gerard Place

Site: This property consists of 26 public housing units. It was built in 1956. The physical address of the property is 8 Estate Richmond, Christiansted, St. Croix.

Location: The sites are near the Caribbean Sea, WAPA utility plant, and the previously demolished Ralph deChabert site.

Construction Scope of Work: The conversion of the Basin Triangle (Alphonso "Piggy" Gerard) project includes the rehabilitation of 26 units in 13 buildings.

The financing transaction of Basin Triangle (Alphonso "Piggy" Gerard) will also include the next D. Hamilton Jackson Terrace project, which consists of 110 units in 14 residential buildings, as well as a community center. These projects are adjacent to each other. These projects comprise 32 one-bedroom units, 60 two-bedroom units, 38 three-bedroom units, and six four-bedroom units. The project is in the Estate Richmond neighborhood of Christiansted and includes 32 one-bedroom units, 48 two-bedroom units, 24 three-bedroom units, and six four-bedroom units.

Development Costs/Funding: Total development cost is estimated at \$108.0 million with funding from CDBG-DR, Permanent Mortgage, and Deferred Developer Fee.

Timeline: Preliminary proformas have been developed, and VIHA is working with the VIHFA to establish a Tax-Exempt Bond Program to provide financing need to bring this project to fruition. Once the Tax-Exempt Bond Program is established, the project should close in the 1st quarter of 2024.

The financial closing is now tentatively scheduled for the 1st quarter of 2024.

Stony Ground - Phase 1 (Wilford Pedro Home aka "Whim Gardens")

Site: Wilford Pedro consists of 98 public housing units. The physical address of the property is 53 Estate Whim, Frederiksted, St. Croix.

Construction Scope of Work: The concept plan calls for the existing 98 units to be demolished and replaced with 97 RAD-LIHTC units. VIHA will request a transfer of assistance of these units to the Stony Ground site as an alternative location to redevelop this project. VIHA has executed a Purchase Agreement for Stony Ground. An acquisition proposal must be submitted to and approved by HUD as part of the RAD conversion process.

Development Costs/Funding: Total development cost is approximately \$89.0 million with funding from CDBG-DR, Permanent Mortgage, and Deferred Developer Fee.

Timeline: TRG, was terminated in March 2023 for convenience. A new RFP will be issued for another developer in July 2023. Once a developer is identified VIHA and the developer will utilize the previous design and construction documents to assist with an expedited closing.

John F. Kennedy Terrace - Phase I (Stoney Ground Phase 2/3)

To address the critical need for housing for the residents of John F. Kennedy Terrace, VIHA will request approval from HUD to transfer 134 RAD project-based rental assistance units from the JFK and Joseph James sites to the Stoney Ground site. This transfer of assistance (ToA) will enable VIHA to build new housing while at the same time allowing residents to remain in place with the new development is being constructed.

Existing residents at JFK and Joseph James will be given the right of first refusal to move to the newly constructed Stoney Ground site, transfer to another VIHA public housing property, or receive a Resident-based voucher to relocate elsewhere.

We expect that the remaining 100 units in this CHAP will be replaced onsite at JFK.

Construction Scope of Work: One hundred (134) new units will be constructed on the Stoney Grounds site in two phases.

Development Costs/Funding: Total development cost is approximately \$61.1 million with funding from CDBG-DR, FEMA, LIHTC equity, Bond Senior Mortgage, and Deferred Developer Fee.

Timeline: The project is expected to close in December 2026.

Williams Delight Villas

Site: The Williams Delight Villas was built in 1969 on 43.4 acres of land and are located on Plots 158 & 159 Estate Williams Delight in St. Croix, Virgin Islands. There are 300 single-family detached homes that vary in size. There are 149 homes on the east side which has a community center building and four small parks. The remaining 151 homes are on the west side which has a large park, a basketball court and six small parks.

Location: The homes are connected to the St. Croix public water system and have cisterns to collect rainwater (the cisterns are not operational at this time). These cisterns are an important source of water because water is scarce and expensive in the U.S. Virgin Islands. As many as four homes share one cistern divided into separate small reservoirs. The foundations are a slab-on-grade construction with exterior 6" pre-cast concrete walls and a 4" flat masonry roof. Some of the homes have been renovated to include a galvanized metal roof above the masonry roof.

Estate Williams Delight, of which Williams Delight Villas is a part, is zoned R-2. The lot sizes within the Williams Delight development range from 3,900 to 6,100 square feet. Since the current zoning laws have an increased lot size minimum, additions to existing homes may be restricted unless a homeowner acquires an adjacent lot to increase the total size of the lot. Provisions will be incorporated in the mortgage documents that limit the use of each lot as residential and will require consistency with the requirements of the current zoning with respect to yards, width, depth, and open space.

Williams Delight is built on low, flat land in the center of the island of St. Croix approximately ten miles from the nearest town of Frederiksted. The development is located between the main east and west highways, Queen Mary Highway on the north and Melvin Evans Highway on the south. Within a two-mile area of Williams Delight there are schools covering pre-school through college.

The site is convenient to both commercial and industrial center of the islands, centrally located to employment and shopping. The site is located along the main east and west travel artery allowing access to the hospital, services, and amenities. Public transportation and a school bus are available at the site.

Construction Scope of Work: The Williams Delight Villas (WD), built in 1969, consists of 300 single-family detached homes. The physical address of the property is 158 Estate William's Delight, Frederiksted, St. Croix.

35 homes have been sold to the families residing in their home at the time of the sale. The Program was approved by HUD on September 8, 1995; and amended in December 2012. 100 of the homes are occupied, with the remaining 165 being vacant.

Demolition: VIHA will demolish Homes that meet HUD's obsolescence requirements. We estimate that 100 units be demolished.

Nicasio Nico Apartments

Site: Nicasio Nico is in East Christiansted on the Island of St. Croix, which includes 60 vacant, significantly deteriorated multi-family units. The physical address is 72C Estate LaGrande Princess, St. Croix, VI 00820.

Location: The site is adjacent to residential neighborhoods and a residential/resort area bordering the Caribbean Sea and has Caribbean views and access to the beach.

Construction Scope of Work: The project will consist of the demolition of 60 units and replacing them with 60 standard project-based units. VIHA anticipates that new units will be constructed back on the site to reconnect the site to the surrounding amenities.

Development Costs/Funding: The total development cost is estimated at \$32.0 million, with funding coming from a variety of sources, including FEMA, CDBG-DR, LIHTC equity, and private financing.

Timeline: The project is expected to close in 2027.

Joseph James Terrace

Site: The property consists of 34 units and was built in 1956 with an addition in 1966. VIHA envisions rehabilitating these units under RAD. The physical address of the property is 184 A&B Estate Ruby, Christiansted. St. Croix.

This project is a part of the 234-unit JFK Terrace CHAP. We expect that these 34 units will be transferred offsite to Stoney Ground via a Transfer of Assistance (ToA).

Location: The site is situated in the Ruby community of Christiansted in the northcentral part of the Island of St. Croix The Stoney Ground site is being explored as an alternative site for this project.

Scope of Work: The project is envisioned as a conversion-only project, which means no additional private funds are expected to be leveraged.

Development Costs/Funding: Total development cost is pegged at \$4.6 million, with all the funding coming from CDBG-DR.

Timeline: The project is expected to close in 2025.

Ludvig E. Harrigan Court

Site: Ludvig Harrigan currently comprised nine (9) one, two, and three-story buildings with a total of 70 dwelling units. The buildings were originally constructed between 1958 and 1960. The official address of the development is #1-5 Estate Mars Hill & Wheel of Fortune, Frederiksted, St. Croix, Virgin Islands 00840.

Location: The buildings are situated in an area to the south of downtown Frederiksted. Entertainment, stores, and restaurants are easily accessible via city streets and public transportation in the St. Croix area. Single-family and multi-family housing and commercial property are common to Estate Mars Hill and Wheel of Fortune.

Construction Scope of Work: Seventy units previously demolished will be replaced with 70 newly constructed standard project-based units.

Development Costs/Funding: Total development cost is pegged at \$37.3 million with funding coming from a variety of sources, including FEMA, CDBG-DR, LIHTC equity, and private financing.

Timeline: The project is expected to close in 2025.

Marley Homes and Marley Homes Additions

Site: These two properties consist of 94 units. The properties were built in 1956, with the additions added in 1966. The physical address for the property is 190A, 190B&191B, Estate Two Brothers, Frederiksted, St. Croix.

Location: These properties are situated in the Two Brothers community of Frederiksted in the southwestern part of the Island of St. Croix. The properties are adjacent to the beautiful West Bay and near the Caribbean Museum Center for the Arts.

Construction Scope of Work: The initial plan called for rehabilitating 94 units under one Commitment to Enter into Housing Assistance Payment (CHAP). VIHA is now exploring ways to reimagine the site by constructing new units that would integrate the development with the surrounding community and take advantage of its proximity to West End Bay.

Development Costs/Funding: Total development cost is pegged at \$61.5 million with funding coming from CDBG-DR, FEMA, Federal Home Loan Bank, Private Mortgage, and LIHTC equity.

Timeline: The project is expected to close in 2025.

Aureo Diaz Heights

Site: Aureo Diaz consists of 100 public housing units. The physical address of the property is #5 Estate Bethlehem, Christiansted, St. Croix, 00851

Location: The site is near the St. Croix VIHA office and is 0.3 miles from the USVI Superior Court and 0.93 miles from the University of the Virgin Islands St. Croix campus.

Construction Scope of Work: The concept plan and feasibility analysis are being developed. The current plan calls for the construction of up to 125 units with 100 RAD-LIHTC units and 25 LIHTC only units. The Stoney Ground site is being explored as an alternative site for this project.

Development Costs/Funding: Total development cost is pegged at \$65 million with funding coming from CDBG-DR, FEMA, Permanent Mortgage, and Deferred Developer Fee.

Timeline: The project is expected to close in 2026.

Mount Pleasant

Site: The site consists of 44 units. The physical address of the site is # 5 Estate Mount Pleasant.

Location: The site is 1.96 miles from Manny Bay, 1.68 miles from Henry E. Rholsen Airport, and .82 miles from the Cruzan Rum Distillery.

Construction Scope of Work: The initial plan called for the redevelopment of 44 units. The concept plan envisions up to 79 units, with 44 units being RAD-LIHTC and 35 being LIHTC-only. The Stoney Ground site is being explored as an alternative site for this project.

Development Costs/Funding: Total development cost is pegged at \$42.7 million with funding coming from CDBG-DR, FEMA, Permanent Mortgage, and Deferred Developer Fee.

Timeline: The Richman Group, in conjunction with VIHA, has begun developing conceptual site plans to reimagine this development. The project is expected to close in 2027.

Candido Guadalupe

Site: This development consists of 90 units that will be demolished. The physical address of the property is # 20 Estate Slob, Kingshill, VI 00851

Location: The site is .29 miles from the Solo Historic District and .16 miles from Alfredo Andrews Elementary School.

Construction Scope of Work: The initial plan calls for the demolition of 90 units and the construction of 90 new units.

Development Costs/Funding: Total development cost is pegged at \$48 million.

Timeline: The project is expected to close in 2027.

Demolition and/or Disposition

Based on Hurricane Irma's impact on the Virgin Islands on September 6, 2017, the Tutu High-Rise Apartments located on St. Thomas, was severely damaged making it unhabitable. VIHA identified the need to demolish the development. An application for the demolition of Tutu High-Rise Apartments was approved by HUD and the phased demolition is in progress. Phase I – The demolition of buildings 10, 11, 12 and 22 was completed in January 2023. The Demolition of Phases 2 and 3 have been awarded and is scheduled to be completed in 2024. The last demolition phase, Phase 4, is scheduled to be demolished in 2025.

The Williams Delight Villas, built in 1969, consists of 300 single-family detached homes. The physical address of the property is 158 Estate William's Delight, Frederiksted, St. Croix. 35 homes have been sold to the families residing in their home at the time of the sale. The Program was approved by HUD on September 8, 1995; and amended in December 2012. 100 of the homes are occupied, with the remaining 165 being vacant. VIHA will demolish homes that meet HUD's obsolescence requirements. We estimate that 100 units be demolished.

1. Development name: Tutu High-rise Apartment, VQ001000012

- 2. Activity type: Demolition 🛛 Disposition 🕅
- 3. Application status: Approved demolition application
- 4. Date demolition application Approved: January 19, 2018
- 5. Number of units affected: 304 Units, Community Center and COCC
- 6. Coverage of action \boxtimes Total development
- Timeline for activity: Planned: Disposition to Developer Partnership (3 Phases)

 Actual or projected start date of activity: December 31, 2023
 December 31, 2023
 - b. Projected end date of activity: December 30, 2027

1. Development name: Ludvig E. Harrigan Court, VQ001000024

- 2. Activity type: Demolition \boxtimes Disposition \boxtimes
- 3. Application status: Approved demolition application \square
- 4. Date demolition application Approved: June 5, 2018
- 5. Number of units affected: 70 units
- 6. Coverage of action: \boxtimes Total development
- Timeline for activity: Completed: Demolition of all buildings March 11, 2022 Timeline for activity: Planned: Disposition to Developer Partnership
 - a. Actual or projected start date of activity: June 30, 2027
 - b. Projected end date of activity: December 31, 2029

1. Development name: Nicasio Nico Apartments, VQ001000022

- 2. Activity type: Demolition \boxtimes Disposition \boxtimes
- 3. Application status: Approved demolition application \bigotimes
- 4. Date demolition application Approved: May 24, 2017
- 5. Number of units affected: 60 Units
- 6. Coverage of action \square Total development

- Timeline for activity: Completed: Demolition of all buildings March 1, 2020 Timeline for activity: Planned: Disposition to developer partnership
 - a. Actual or projected start date of activity: December 30, 2026
 - b. Projected end date of activity: December 30, 2028

1. Development name: John F. Kennedy Terrace, VQ001000022

- 2. Activity type: Demolition igsqcolorembox Disposition igsqcolorembox
- 3. Application status: **Planned** application
- 4. Date application Planned for submission: September 30, 2024
- 5. Number of units affected: 200 Units
- 6. Coverage of action: \square Total development
- 7. Timeline for activity: Disposition to developer partnership
 a. Actual or projected start date of activity: December 30, 2024
 b. Projected end date of activity: December 30, 2026

1. Development name: Ralph deChabert Place, VQ001000021

- 2. Activity type: Disposition \boxtimes
- 3. Application status: **Planned** application
- 4. Date application **planned** for submission: October 31, 2023
- 5. Number of units affected: Vacant Land Only 19.3 Acres
- 6. Coverage of action: \square Total development
- 7. Timeline for activity: Disposition to Government of the USVI
 a. Actual or projected start date of activity: December 31, 2023
 b. Projected end date of activity: March 30, 2024

1. Development name: Estate Mon Bijou, VQ001009999

- 2. Activity type: Demolition \boxtimes Disposition \boxtimes
- 3. Application status: Planned application
- 4. Date application **planned** for submission: September 30, 2023
- 5. Number of units affected: 3 single-family lots and Community Center Building
- 6. Coverage of action: \square Part of the development
- 7. Timeline for activity:
 - a. Actual or projected start date of activity: December 31, 2023
 - b. Projected end date of activity: January 30, 2024

1. Development name: Hoffman/Nullyberg Property- (No AMP Number)

- 2. Activity type: Disposition \boxtimes
- 3. Application status: Planned application \square
- 4. Date application planned for submission: September 30, 2024
- 5. Number of units affected: No units. Land only. 35.8 Acres
- 6. Coverage of action (select one) 🛛 Total development
- 7. Timeline for activity:
 - a. Actual or projected start date of activity: June 30, 2024
 - b. Projected end date of activity: December 31, 2025

1. Development name: Williams Delight Villas, VQ001000025

- 2. Activity type: Demolition \square Disposition \square
- 3. Application status: **Planned** application
- 4. Date application **planned** for submission: September 30, 2024
- 5. Number of units affected: 105 Units (demolition), 160 Units (disposition through homeownership or land sale)
- 6. Coverage of action: \square Part of the development
- 7. Timeline for activity:
 - a. Actual or projected start date of activity: December 31, 2022
 - b. Projected end date of activity: December 31, 2025

1. Development name: Lucinda Millin Home, VQ001000014

- 2. Activity type: Demolition \square Disposition \square
- 3. Application status: **Planned** application
- 4. Date application **planned** for submission: September 30, 2025
- 5. Number of units affected: 85 Units
- 6. Coverage of action: 🔀 Total Development
- 7. Timeline for activity:
 - a. Actual or projected start date of activity: December 30, 2025
 - b. Projected end date of activity: December 31, 2027

1. Development name: Oswald Harris Court, VQ001000011

- 2. Activity type: Demolition \square Disposition \square
- 3. Application status: **Planned** application
- 4. Date application planned for submission: February 28, 2024
- 5. Number of units affected: 16 Units (demolition)
- 6. Coverage of action: \square Part of the development
- 7. Timeline for activity: Disposition to developer partnership
- a. Actual or projected start date of activity: September 30, 2024
- b. Projected end date of activity: December 31, 2028
- 1. Development name: Paul M. Pearson Gardens, VQ001000014
- 2. Activity type: Demolition \square Disposition \square
- 3. Application status: **Planned** application \square
- 4. Date application **planned** for submission: January 30, 2025
- 5. Number of units affected: 120 Units
- 6. Coverage of action: Total Development
- 7. Timeline for activity: Disposition to developer partnership
 - a. Actual or projected start date of activity: December 31, 2025
 - b. Projected end date of activity: December 31, 2027

- 1. Development name: David Hamilton Jackson Terrace, VQ001000022
- 2. Activity type: Demolition \Box Disposition \boxtimes
- 3. Application status: **Planned** application
- 4. Date application **planned** for submission: September 30, 2023
- 5. Number of units affected: 110 Units
- 6. Coverage of action: Total Development
- 7. Timeline for activity: Disposition to developer partnership
 - a. Actual or projected start date of activity: Closing Date: December 31, 2023
 - b. Projected end date of activity: December 31, 2025
 - 1. Development name: Alphonso "Piggy" Gerard, VQ001000022
 - 2. Activity type: Demolition \Box Disposition \boxtimes
 - 3. Application status: **Planned** application
 - 4. Date application **planned** for submission: September 30, 2023
 - 5. Number of units affected: 26 Units
 - 6. Coverage of action: Total Development
 - 7. Timeline for activity: Disposition to developer partnership
 - a. Actual or projected start date of activity: Closing Date: December 31, 2023
 - b. Projected end date of activity: December 31, 2025
 - 1. Development name: Wilford Pedro Home, VQ001000025
 - 2. Activity type: Demolition \boxtimes Disposition \boxtimes
 - 3. Application status: **Planned** application
 - 4. Date application **planned** for submission: June 30, 2023
 - 5. Number of units affected: 98 Units
 - 6. Coverage of action: Total Development
 - 7. Timeline for activity:
 - a. Actual or projected start date of activity: Closing Date: March 1, 2023
 - b. Projected end date of activity: December 31, 2025

1. Development name: Michael J. Kirwan Terrace, VQ001000015

- 2. Activity type: Demolition \Box Disposition \boxtimes
- 3. Application status: **Planned** application
- 4. Date application **planned** for submission: November 30, 2023
- 5. Number of units affected: 2.20+/- acres
- 6. Coverage of action: 🛛 Part of the development
- 7. Timeline for activity: Disposition to V. I. Waste Management Authority
- c. Actual or projected start date of activity: Closing Date: March 31, 2024
- d. Projected end date of activity: June 30, 2024

- 1. Development name: Ross Taarenberg (Warren E. Brown), VQ001026A
- 2. Activity type: Demolition \boxtimes Disposition \boxtimes
- 3. Application status: **Planned** application
- 4. Date application **planned** for submission: June 30, 2023
- 5. Number of units affected: 0.33 Acres
- 6. Coverage of action: 🛛 Part of the development
- 7. Timeline for activity:
 - a. Actual or projected start date of activity: Closing Date: December 31, 2023
 - b. Projected end date of activity: March 31, 2024

Conversion of Public Housing to Project-Based Assistance Under RAD

VIHA will continue based on the 2018 CHAP approvals, the conversion of one or more of its St. Croix properties for conversion to project-based assistance under the Rental Assistance Demonstration Program in 2019. Participation in the program would allow for the redevelopment and/or modernization of properties that VIHA currently does not have the financial resources to undertake.

The Virgin Islands Housing Authority anticipates converting additional developments to project-based assistance under the Rental Assistance Demonstration (RAD) Program.

VIHA certifies that it is currently compliant with all fair housing and civil rights requirements, including those imposed by any remedial orders or agreements that may arise in the future.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing VIHA with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration.

The conversion of the public housing properties to the Multifamily RAD Project-Based Rental Assistance (PBRA) program will entail a meaningful change from VIHA's standard business operations. The properties will transition from the HUD Office of Public and Indian Housing (PIH) Division to the HUD Office of Multifamily Housing (MFH) Division. It is important to understand that the property will no longer be a part of VIHA's regular inventory. Therefore, unlike the RAD PBV program (which remains under PIH), VIHA's HCVP staff will not administer the MF RAD PBRA HAP Contract.

The RAD PBRA HAP Contract will be between HUD and the new Owner. The initial contract will be for 20 years and will be subject to annual appropriations. HUD shall offer, and the Project Owner shall accept, a renewal contract for the prescribed number of units at the expiration of the initial contract and each renewal contract. Each Covered Project with a PBRA HAP Contract will be subject to a 20-year RAD Use Agreement that will renew with the HAP Contract on the property assisted by the HAP Contract.

At conversion, the public housing properties will transition to blended properties, subject to the requirements of both the PBRA and the LIHTC programs. All new applicants must qualify for both programs to be deemed eligible for admission. VIHA's HCVP staff will establish and manage the waiting lists and

determine new applicant eligibility. The Owner's Agent (a private property management company) will be responsible for all other aspects of administering the programs and managing the property.

VIHA will establish and maintain Multifamily RAD PBRA Site Based Wait Lists for the properties converting to project-based rental assistance. Each list will initially be populated with families with a right to return to each affected project and the existing applicants on the public housing waiting list of the same district (on the date each project receives a RAD Conversion Commitment (RCC)), and then opened to the public. The existing public housing applicants who wish to be added to Multifamily RAD PBRA Site Based Wait Lists in both districts will be added to said lists and will maintain their original public housing application date(s).

Preference in selecting applicants for each site-based waiting list will be given in the following order to: (1) residents with a right to return, (2) residents displaced due to governmental action including (a) converting public housing projects under RAD to project-based vouchers (PBV), project-based rental assistance (PBRA) or Mixed-Finance, or (b) a government-declared natural disaster. Within each preference category, applicants shall be selected based on the date and time of application, except that preference for units with disability features shall be given to applicants requiring the features of these units.

For public housing projects converting assistance to PBRA under the First Component of the Demonstration, 24 CFR part 880, Section 8 Housing Assistance Payments Program for New Construction as modified for RAD and as set forth in Appendix I (of the Notice H 2019-09) and applicable existing and subsequent Office of Housing guidance will apply.

Special Provisions Affecting the Public Housing Conversions to the RAD PBRA Program may be found in Notice H 2019-09 (Section 1.7).

Project Description: Wilford Pedro Home: The concept plan calls for the existing 98 units to be demolished and replaced with 97 RAD-LIHTC units and one employee-occupied unit. VIHA has received approval of a transfer of assistance (ToA) of these units to the Stoney Ground site as an alternative location to redevelop this project. VIHA has executed a Purchase Agreement for Stoney Ground. An acquisition proposal must be submitted to and approved by HUD as part of the RAD conversion process.

Name of Development	Wilford Pedro Home
AMP #	VQ001000025
PBV or PBRA	PBV
Capital Fund Impact	\$398,175.18
De Minimis Reduction	Yes
Post-Conversion Bedroom Mix	
1 BR	84
2 BR	13
Total Post Conversion Units	97
Pre-Conversion Unit Type	Family

There will be 84 one-bedroom units and 13 two-bedroom units. The remaining unit will be a non-RAD employee occupied unit.

Post-Conversion Unit Type	Elderly/Disabled
Transfer of Assistance	Yes

Current Project Address: 53 Estate Whim, Frederiksted, St. Croix, 00840. The Project will be transferred to Stoney Ground, St. Croix, VI 00840

Project Description: John F. Kennedy Terrace will be demolished in phases as part of a RAD conversion. The first phase will include the transfer of assistance (ToA) to Stoney Ground for the construction of up to 100 units. Phase 2 will consist of the construction of 100 units on site.

VIHA proposes to convert 234 units to RAD, including 200 units at John F. Kennedy Terrace and 34 at Joseph James. These units will be replaced with new units on and offsite.

Name of Development	John F. Kennedy Terrace
AMP #	VQ001000022A
PBV or PBRA	PBV
Capital Fund Impact	\$0.00
De Minimis Reduction	No
Post-Conversion Bedroom Mix	
0 BR	8
1 BR	70
2 BR	60
3 BR	72
4 BR	16
5 BR	8
Total Post Conversion Units	234
Pre-Conversion Unit Type	Family
Post-Conversion Unit Type	Family
Transfer of Assistance	Yes

Project Address: 1 Estate Richmond, Christiansted, St. Croix, 00820

Project Description: The financing transaction of **Basin Triangle (Alphonso "Piggy" Gerard)** will also include the next **D. Hamilton Jackson Terrace** project, which consists of 110 units in 14 residential buildings, as well as a community center. These projects are directly adjacent to each other. These projects comprise 32 one-bedroom units, 60 two-bedroom units, 38 three-bedroom units, and 6 four-bedroom units. The project is in the Estate Richmond neighborhood of Christiansted and includes 32 one-bedroom units, 48 two-bedroom units, 24 three-bedroom units, and six four-bedroom units.

Name of Development	Ralph deChabert (David Hamilton Jackson and Alphonso "Piggy" Gerard)
AMP #	VQ 001000021
PBV or PBRA	PBRA

Capital Fund Impact	\$344,064
De Minimis Reduction	No
Post-Conversion Bedroom Mix	
1 BR	32
2 BR	60
3 BR	42
4 BR	6
Total Pre-Conversion Units	136
Post-Conversion Bedroom Mix	
2 BR	60
3 BR	42
4 BR	6
Total Post -Conversion Units	136
Pre-Conversion Unit Type	Family
Post-Conversion Unit Type	Family

Project Address: The physical address of David Hamilton Jackson is 7 Estate Richmond, Christiansted, St. Croix, and the physical address for Alphonso Gerard is 8 Estate Richmond, Christiansted, St. Croix.

Project Description: Marley Homes and Marley Additions may be combined with Marley Homes into a single Commitment to Enter Housing Assistance Payment (CHAP). These properties in Two Brothers community of Frederiksted in the southwestern part of the Island of St. Croix. The property was built in 1956 with the additions added in 1966. VIHA envisions rehabilitating these 94 units under CHAP.

Name of Development	Marley Homes Additions
AMP #	VQ 001000024
PBV or PBRA	PBV
Capital Fund Impact	\$165,600
De Minimis Reduction	No
Post Conversion Bedroom Mix	
1 BR	8
2 BR	18
3 BR	26
4 BR	8
Total Post-Conversion Units	60
Post-Conversion Bedroom Mix	
1 BR	8
2 BR	18
3 BR	26
4 BR	8
Total-Post Conversion Units	60
Pre-Conversion Unit Type	Family

	Post-Conversion Unit Type	Family
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Project Address: 190A, 190B&191B, Estate Two Brothers, Frederiksted, St. Croix, VI

Project Description: Oswald Harris Court was built in 1959 and contains 300 units and will be demolished under Section 18 to provide housing with a preference for the elderly.

Name of Development	Oswald Harris
AMP #	VQ 001000011
PBV or PBRA	PBV
Capital Fund Impact	\$817,200
De Minimis Reduction	Yes
Pre-Conversion Bedroom Mix	
1 BR	52
2 BR	96
3 BR	116
4 BR	24
5 BR	12
Total Pre-Conversion Units	300
Post-Conversion Bedroom Mix	
1 BR	49
2 BR	91
3 BR	111
4 BR	23
5 BR	11
Total Post Conversion Units	285
Pre-Conversion Unit Type	Elderly
Post-Conversion Unit Type	Elderly

Project Address: Parcel # 1A Estate Thomas, # 5 New Quarter, St. Thomas, VI

Project Description: Estate Bovoni contains 366 units. All these units will be converted to project-based assistance under RAD.

Name of Development	Estate Bovoni
AMP #	VQ 001000013
PBV or PBRA	PBV
Capital Fund Impact	\$1,001,376
De Minimis Reduction	No
Pre- Conversion Bedroom Mix	
1 BR	61
2 BR	129
3 BR	128

4 BR	48
Total Pre- Conversion Units	366
Post-Conversion Bedroom Mix	
1 BR	61
2 BR	129
3 BR	128
4 BR	48
Total Post- Conversion Units	366
Pre-Conversion Unit Type	Family
Post-Conversion Unit Type	Family

Project Address: #2-3A Estate Bovoni, St. Thomas, VI

Project Description: Aureo Diaz Heights consists of 100 units and was constructed in 1968. The VIHA anticipates converting 75 units to project-based assistance under RAD and 25 units to project-based assistance under the standard PBV program.

Name of Development	Aureo Diaz Heights
AMP #	VQ 001000023
PBV or PBRA	PBV
Capital Fund Impact	\$272,400
De Minimis Reduction	No
Pre-Conversion Bedroom Mix	
1 BR	22
2 BR	32
3 BR	16
4 BR	10
Total Pre-Conversion Units	100
Post-Conversion Bedroom Mix	
1 BR	22
2 BR	32
3 BR	36
4 BR	10
Total Post Conversion Units	100 (75 RAD/25 Standard PBV)
Pre-Conversion Unit Type	Family
Post-Conversion Unit Type	Family

Project Address: # 5 Upper Bethlehem, Kingshill, St. Croix, VI

Project Description: The Knolls at Contant was built in 1971 and contains 96 unit. The agency anticipates converting this property to RAD as an operational conversion.

Name of Development	The Knolls at Contant
AMP #	VQ 001000015

PBV or PBRA	PBV
Capital Fund Impact	\$208,512
De Minimis Reduction	No
Pre-Conversion Bedroom Mix	
1 BR	8
2 BR	20
3 BR	56
4 BR	8
Total Pre-Conversion Units	96
Post-Conversion Bedroom Mix	
2 BR	8
3 BR	20
4 BR	56
5 BR	8
Total Post Conversion Units	96
Pre-Conversion Unit Type	Family
Post-Conversion Unit Type	Family

Project Address: #171 Estate Contant, St. Thomas, VI

Project Description: Mount Pleasant was built in 1971 and contains 44 units. All of these units will be converted to project-based rental assistance under RAD. VIHA anticipates that will be an operational conversion.

Name of Development	Mount Pleasant		
AMP #	VQ 001000023		
PBV or PBRA	PBV		
Capital Fund Impact	\$119,856		
De Minimis Reduction	No		
Pre-Conversion Bedroom Mix			
1 BR	0		
2 BR	24		
3 BR	20		
4 BR	0		
Total Pre-Conversion Units	44		
Post-Conversion Bedroom Mix			
1 BR	0		
2 BR	24		
3 BR	20		
4 BR	0		
Total Post Conversion Units	44		
Pre-Conversion Unit Type	Family		
Post-Conversion Unit Type	Family		
Project Address: #5 Estate Mount Pleasant, St. Croix, VI			

Project Address: #5 Estate Mount Pleasant, St. Croix, VI

Units with Approved Vacancies for Modernization

VIHA's public housing portfolio is organized into 12 Asset Management Projects (AMPs) and includes 2,525 public housing units. VIHA is focused on the rehabilitation of vacant apartments. VIHA currently has approximately 15 vacant apartments undergoing modernization. VIHA will continue to assess the number of units to be exempted under this category during the fiscal year.

Project-Based Vouchers

VIHA administers the Territory's Housing Choice Voucher Program, which is budgeted to provide rental assistance to 2,162 low-income households. VIHA provides project-based rental subsidy to affordable housing sites on St. Thomas and St. Croix. VIHA will advocate for increased funding allocations to provide additional units with Project-Based Vouchers (PBV). VIHA will support changes in HUD regulations to increase the cap of PBV available in its funding allocation.

B4. Most Recent Fiscal Year Audit

VIRGIN ISLANDS HOUSING AUTHORITY SCHEDULE OF FINDINGS AND QUESTIONED COSTS DECEMBER 31, 2021

I. Summary of Auditors' Results

<u>Finar</u>	ncial Statement Section			
1.	Type of auditors' report issued: Unmodified			
2.	Internal control over			
	a. Material weal	ness(es) identified?	No	
	b. Significant de	ficiency(ies) identified?	None Reported	
3.	Noncompliance material to the financial statements? No			
Feder	al Awards Section			
1.	Internal control over compliance:			
	a. Material weak	ness(es) identified?	No	
	b. Significant de	ficiency(ies) identified?	None Reported	
2.	Type of auditors' report on compliance for major programs:		Unmodified	
3.	Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)? No			
4. Identification of major programs:				
	CFDA Numbe	Name of Federal Program		
	14.850 14.PHC 14.872	Public and Indian Housing Program Public and Indian Housing Program Public Housing Capital Fund		
5.	Dollar threshold used to distinguish between Type A and Type B Programs:		\$1,901,953	
6.	Auditee qualified as lo	ow-risk Auditee?	No	

B5. 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. For Fiscal Year 2023, VIHA has restated its mission statement and refined its Strategic Framework. The figure below diagrams VIHA's four (4) overarching goals and twenty (20) sub-goals. VIHA will concentrate on improving quality control and transparency, enhancing its housing portfolio, increasing operational efficiency while encouraging resident advocacy.

VIHA'S FY 2021-2025 Strategic Framework

The Virgin Islands Housing Authority encourages the development and professional management of a variety of affordable housing opportunities, facilities and supportive services to sustain vibrant and progressive communities, provide economic development and self-sufficiency options for residents, assuring equal access to quality housing and safer communities through partnerships.

Goal 1. Implement Asset	Goal 2. Develop and	Goal 3. Implement industry	Goal 4. Increase resident					
Repositioning and	Implement industry best	best practices in Asset	economic family self-sufficiency					
Redevelopment Plan by	practices in HR, IT and	Management and HCVP	through mixed-income					
maximizing the leveraging	Procurement divisions		communities and leveraging					
of federal funds	through systems, processes		Housing Choice Vouchers					
	and procedures							
FY2021	FY2021 FY2022		FY2024					
	FY 2023	Sub-Goals						
1A. Implement portfolio	2A Research & Implement	3A. Procure and Implement	4A. Develop a core resident					
transformation through	industry best practices in	Asset Management	services platform designed					
Asset Repositioning	IT to support Asset	Company to manage	for progressive economic					
Plan and HUD's RAD	Management	3rd Party Property	family self-sufficiency					
Program		Management	•					
1B. Expedite relocation,	2B. Coordínate process to	3B. Implement strategies to	4B. Forge stakeholder &					
demolition &	effectively prepare and	reduce accounts	resident leadership					
redevelopment of Tutu	retrieve Executive Office	receivables to	support of Asset					
High-Rise on three sites		benchmark standard of	Repositioning Plan &					
High-Rise on three sites	and board documents	2% of rents						
		2% of rents	deconcentration of poverty					
1C. Expedite relocation,	2C. Negotiate a fair and	3C. Increase REAC overall	4C. Promote resident lease					
demolition &	progressive collective	Inspection score on	accountability to transition					
redevelopment of JFK	bargaining agreement	PHAS with	from legacy public housing					
on two or three sites	and introduce	implementation of a	to other subsidy models					
	performance-based	Preventative						
	evaluations for staff	Maintenance Plan						
1D. Expedite relocation,	2D. Determine agency	3D. Improve quality of life	4D. Develop action plan to					
demolition &	training requirements,	through sustained curb	increase resident financial					
redevelopment of	and coordinate and	appeal strategies	literacy to participate in					
Lucinda Millin into	evaluate effectiveness of	including enhanced						
		•	homeownership initiatives					
senior housing and	training	landscape features at						
healthcare model		all developments						
1E. Expedite planning,	2E. Update Personnel Policy	3E. Procure 3rd party	4E. Implement public relations					
demolition &	to implement progressive	property management	and education programs					
redevelopment of	performance appraisal	companies to manage	for residents, landlords					
VIHA's Central Office	with Reward &	public housing AMPs by	and the public to					
with mixed used facility	Recognition plan	District	understand the value of					
			Housing Choice vouchers					
	FY2025							

FY2025

Goal 5. Prepare People, Processes and Procedures for functional transition of operations to support 10-Year Redevelopment Plan

5A. Develop a Short-term Strategic Plan for IT including a Dashboard for senior staff to monitor operational progress towards achieving goals.

5B. Develop an Executive Office electronic archival and retrieval system for resolutions,

5C. Negotiate a fair and progressive collective bargaining agreement and introduce performance-based evaluation for staff growth and development.

5D. Implement training for key positions to support transition to 3rd-Party Property Management and 10-Year Redevelo 5E. Update Personnel Policy to implement progressive performance evaluation with reward and recognition plan <u>VIHA Strategic Goal 1</u>: Implement Asset Repositioning and Redevelopment Plan by maximizing the leveraging of federal funds.

Goal No. 1 Objectives:

Sub-goals:

A. Implement portfolio transformation through Asset Repositioning Plan and HUD's RAD Program

Status: The goals in the Transition Agreement have all been completed except for the Public Housing Occupancy and Residents Account Receivables which are longer-term in nature and are appropriately monitored in the Public Housing Assessment System (PHAS).

B. Expedite relocation, demolition & redevelopment of Tutu High-Rise on three sites

Status: Relocation of all 284 Estate Tutu Residents was successfully completed with the last resident moving out on December 21, 2018. Construction of Phase I of the Estate Tutu Redevelopment on the old Estate Donoe site began on December 7, 2020, to start the 3-phase redevelopment of the former Estate Tutu Hi-Rise Apartments. Phase II is scheduled to start in January 2023.

C. Expedite relocation, demolition & redevelopment of JFK on two or three sites

Status: Relocation for John F. Kennedy residents is currently on hold. Relocation began with 157 families in place in 2021. However, as per the directive of the Governor, VIHA has held back on this relocation initiative, and has realigned its redevelopment efforts to make sure that a new development is constructed for the families to relocate to. Instead of providing HCVP vouchers or placement in other LIPH units.

D. Expedite relocation, demolition & redevelopment of Lucinda Millin into senior housing and healthcare model

Status: VIHA has committed to plan and provide relocation options for seniors prior to demolition. The schedule is still being formulated.

E. Expedite planning, demolition & redevelopment of VIHA's Central Office with mixed used facility

Status: VIHA is still working on design of its existing office location, other location options and the best configuration to support a more professional office for clients that provides the needed service and safety precautions, with the observance of new health protocols.

<u>VIHA Strategic Goal 2</u>: Develop and Implement industry best practices in HR, IT and Procurement divisions through systems, processes, and procedures.

Goal No. 2 Objectives:

Sub-goals:

- A. Research & Implement industry best practices in IT to support Asset Management Status: The capabilities of the IT organization help to identify operational readiness in the characteristics and competencies required to support Asset Management effectively. The IT Department continues to rebuild its infrastructure that was damaged from the hurricanes of 2017. Once that infrastructure rebuild is completed in 2023, the support necessary to properly network and provide the connectivity and efficiency to Asset Management will be more realistic.
- **B.** Coordinate process to effectively prepare and retrieve Executive Office and Board documents Status: Our IT Department has implemented a web-based solution for Board documents to be retrieved from VIHA's website. This process is being refined as VIHA continues to update its IT platform and its website.

C. Negotiate a fair and progressive collective bargaining agreement and introduce performance-based evaluations for staff

Status: VIHA successfully negotiated its 2022-2024 Collective Bargaining Agreement with the United Steelworker Union (Locals 8248 and 8249). VIHA will continue to foster a positive and collaborative relationship with the Unions and work towards developing and implementing a fair and equitable performance-based system for its unionized and non-unionized employees.

D. Determine agency training requirements, and coordinate and evaluate effectiveness of training

People are our most valued resource and VIHA will invest in their growth and development through and integrated training approach for employees at all levels (union and non-union). The integrated approach will be based on:

Manager as Coach: Coaching for performance and development training will be provided to all managers of employees. Managers will learn communication, delegation, goal setting, setting clear expectations, coaching conversation, and performance management skills.

These new skills will help managers identify the skills and training needed for their employees to successfully achieve their goals. Individual development plans will be created focused on the 3Es of development.

- Development through Experience (on-the-job training, learning from mistakes, job sharing, etc.)
- Development through Exposure (mentoring, coaching, accountability groups, etc.)

• Development through Education (formal training, conferences,

In addition to performance related learning, employees will have the opportunity to improve or develop in the following areas:

Project Management, Negotiating, Critical Thinking, Emotional Intelligence, Conflict Resolution, Building Trust, Developing and Managing Relationships etc.

Lastly, the senior leadership team and board members will receive and Emotional Intelligence diagnostic Leadership Assessment to identify strengths and areas for development. Professional coaching services will be provided to help leaders meet their development goals.

F. Update Personnel Policy to implement progressive performance appraisal with Reward & Recognition Plan.

Status: VIHA completed an update of its 2002 Personnel Policy and Procedures Manual and replaced it with a new Personnel Handbook. VIHA is currently reviewing a Reward and Recognition Policy to support performance improvement. These documents will be submitted to the Board, and it is anticipated that both documents will be implemented in FY 2023.

VIHA Strategic Goal 3: Implement industry best practices in Asset Management and HCVP.

Goal No. 3 Objectives:

Sub-goals:

A. Procure and Implement Asset Management Company to manage 3rd Party Property Management Companies

Our goal is to develop our transitioning staff to be competitive in the public/private job markets. To accomplish this goal, the authority will provide internal and external education and training opportunities to help them increase their competence and people skills.

Properties that are transitioning to 3rd-party property management will be identified; key positions and employees will be identified for training. VIHA will conduct a needs analysis to identify training and development needs of employees. Training content will be curated or developed. VIHA will oversee training and development plan to ensure training needs are being met. Throughout the training phase, course(s) and content will be evaluated to determine return on investment.

B. Implement strategies to reduce accounts receivables to benchmark standard of 2% of rents

Status: Staff have put in place measures for residents to report loss of income to adjust the resident's rent accordingly. This ensures the residents do not incur undue rent burdens. Information regarding loss of employment and how the Property Manager can assist the household has been

communicated via public service announcements, press releases, as well as direct mailings to all Public Housing residents. Resident Account Receivable is one of the categories that is scored by HUD for the financial indicators.

The objective of the Department of Asset Management is to purge the balances and determine the accuracy of each Resident's TARs by taking into consideration deferred maintenance repairs and adjusting the individual accounts accordingly. We continue to use the following objectives to reduce the TARs balance:

- Adjust TARs balances by deducting deferred maintenance
- Implement interim rent adjustments due to loss of household income
- Prioritize the largest household TARs balances and secure repayment agreements

C. Increase REAC overall Inspection score on PHAS with implementation of a Preventative Maintenance Plan

Status: The Agency continues to refine its processes toward this objective, including utilizing a work order grouping system (i.e., emergency, routine, or inspections), reviewing existing staff's skills and conducting targeted placement to address work orders (i.e., plumbing, electrical, carpentry, masonry, etc.). The Agency is currently focused on reducing the amount of open work orders. A Preventative Maintenance Plan was developed in the first quarter of 2020. Due to the challenges and setbacks caused by COVID-19, it is safe to say, the launching of the Preventative Maintenance Plan will not be as effective as originally planned until the mid-2023.

D. Improve quality of life through sustained curb appeal strategies including enhanced landscape features at all developments

Status: A plan to enhance curb appeal has been developed considering the existing landscape unique to each development. Existing personnel is currently receiving on the job training on enhancing the landscape and maintaining curb appeal. Pilot sites are being selected to implement an example of what this new landscaping element would look like; one site on St. Thomas and one site on St. Croix.

E. Procure 3rd party property management companies to manage public housing AMPs by District Status: VIHA is working with its developer partners to engage third-party property management companies in each new development.

<u>VIHA Strategic Goal 4</u>: Increase resident economic family self-sufficiency through mixed-income communities and leveraging Housing Choice Vouchers.

Goal No. 4 Objectives:

Sub-goals:

A. Develop a core resident services platform designed for progressive economic family selfsufficiency.

1. Operationalized Policies & Procedures

Resident Wellness & Empowerment leadership developed a comprehensive departmental operations manual which consist of updated policies and procedures for each functional area within the department. This includes service coordination, Family Self-Sufficiency (FSS), Resident Councils, and grants and contracts administration. In each area of department operations, policies and procedures will be developed based upon HUD guidelines and an examination of best practices.

2. Staffing & Recruitment

Recruitment - Resident Wellness & Empowerment (RWE) has developed new job descriptions for each area of the department and recruitment will continue to thoughtfully fill the existing vacancies within the department. Recruitment efforts will include internal candidates and both local and national outreach. – New job descriptions for all positions within the RWE have been finalized and posted through HR's regular recruitment channels. HR has reported a great response thus far to each of the open positions within RWE.

3. Training & Skill Development – RWE will develop and implement a comprehensive training workshop which will train staff on the new direction of the department, their roles, and new processes for conducting the day-to-day work of facilitating resident success. Additionally, team members will be provided with a required menu of trainings that addresses needed skill development areas.

University of the Virgin Islands/School of Social Work – Steps to formalize a relationship between UVI and is School of Social Work and VIHA has completed. RWE department will serve as a field placement internship site for Social Work students in both the undergraduate and graduate Social Work programs.

4. Bright Path Community Health & Wellness Centers

Via the U. S. House of Representatives Committee on Appropriations, VIHA and its RWE department has secured a total of \$300,000 to implement strategies designed to address the mental health needs of residents residing in VIHA communities. RWE will collaborate with selected community partners to create and operate Community Health and Wellness centers ensuring the provision of onsite mental health and connections to other health related services in community center space located in two (2) VIHA public housing communities (1 in St. Thomas

and 1 in St. Croix). Deploying Community Health Workers, a specific focus will be given to elderly and disabled individuals in their quest to achieve healthy aging, thus creating a supportive housing environment.

- VIHA and RWE will continue to identify and secure funding to support the ongoing operations of this initiative which seeks to achieve the following outcomes.
- Convenient and easily accessible
- Improved mental and physical health
- Increased mental bandwidth to execute tasks that help lift residents out of poverty
- Decreased lease violations

5. Relationship Building

To aid RWE staff in ensuring the success of implementing the Bright Path strategy and facilitating positive resident outcomes, RWE will be procuring some specific specialized professional consulting services for the purposes of aiding its staff in developing effective relationships and partnerships with VIHA residents, community service providers (both nonprofit and governmental), and the broader community. The selected firms will be specifically charged with leading RWE in the development of a comprehensive community engagement strategy and a marketing and communications strategy.

B. Forge stakeholder & resident leadership support of Asset Repositioning Plan & deconcentration of poverty

Bright Path Community Service Coordination Plans

Based on data collected via a needs assessment process, CRRCs will develop Bright Path Community Service Coordination Plans for the communities in which they are responsible for ensuring service coordination for. Upon final approval of RWE leadership, CRRCs will implement those plans while working with individuals or families in their assigned communities and with community partners to identify and implement strategies and interventions to facilitate positive outcomes and individual and family wholistic wellness.

Resident Councils

Instrumental in ensuring connections to services and resources and positive resident outcomes is the operations of effective Resident Councils at each VIHA community. The role of all VIHA resident councils is to improve the quality of life and resident satisfaction as well as participating in self-help process while enabling residents to create positive living environments for all residents living in VIHA communities. Resident Councils will actively participate in the wellness and empowerment of residents via a working partnership with VIHA. Thus, VIHA will work to ensure the effective operations of more Resident Councils within VIHA communities this upcoming year.

C. Promote resident lease accountability to transition from legacy public housing to other subsidy models

Status: VIHA will educate resident council members on lease provisions with emphasis on the Community Service and Self-Sufficiency requirement. VIHA will seek community service placement opportunities with government agencies, the non-profit sector, the business sector, the VIHA Governing Board and through the members of the FSS Program Coordinating Committee.

D. Develop action plan to increase resident financial literacy to participate in homeownership initiatives

Status: VIHA will continue to work closely with property managers, duly elected resident leaders and other interest community stakeholders to conduct resident meetings with the goal of orienting, educating, and encouraging residents about importance and benefits of resident council membership. VIHA will continue to identify interested residents, aid, support, schedule coordination and conduct resident council elections in accordance with HUD guidelines.

E. Implement public relations and education programs for residents, landlords and the public to understand the value of Housing Choice vouchers.

Status: VIHA will distribute posters, flyers, and brochures for the Family Self-Sufficiency program (FSS), within VIHA communities, during annual resident certification, and in the broader community. VIHA will showcase resident programs and successful outcomes. VIHA will participate in community fairs and events which align with current agency priorities and initiatives.

Goal No. 5 Objectives: Prepare People, Processes and Procedures for functional transition of operations to support 10-Year Redevelopment Plan

Sub-goals:

A. Develop a Short-term Strategic Plan for IT including a Dashboard for senior staff to monitor operational progress towards achieving goals.

Status: Administrative Fundamentals

It is essential to have the proper governance and policies defined to drive the direction of VIHA's technology landscape. A successful governance implementation will require support from the entire organization and a culture shift to support processes under the new model. This shift will need executive sponsorship to help drive the establishment and execution of new policies. Management's lack of commitment may deliver half-implemented processes or zero traction toward change. Critical activities involved with this include:

• Establish frameworks detailing SOPs (Standard Operating Procedures) for IT

- Develop a data resilience plan
- Develop business continuity strategy
- Develop Service Level Agreements to improve our customer's experience

Core Infrastructure

Establishing a sustainable infrastructure to support the Housing Authority's current business is vital to realizing future capabilities. Areas of focus include:

- Updating St. Thomas and St. Croix server rooms to provide a secure environment of physical assets.
- Establish high-availability architecture to mitigate against potential vulnerabilities and outages from natural and malicious events.
- Hardened IT security to bolster protection from attacks and data breaches.

Workforce Expansion

VIHA should consult a network architect to assess the environment and further determine the effort required to develop their infrastructure. This assessment and the VIHA technology roadmap can establish a refined budget and timeline to conclude the prioritization and scale of its infrastructure needs.

As VIHA matures its infrastructure and services, positioning the right resources to support the growth is critical to ensuring success. VIHA should consider acquiring an additional full-time employee to reinforce its support model. An analyst or engineer having a range of experience in supporting VIHA's infrastructure and services will also benefit its future growth strategy.

B. Develop an Executive Office electronic archival and retrieval system for resolutions,

Status: After documenting the system requirements, an electronic portal was developed and posted to VIHA's website. Further enhancements are necessary.

C. Negotiate a fair and progressive collective bargaining agreement and introduce performancebased evaluation for staff growth and development.

Status: The authority's leadership team will meet with USW representatives to discuss proposed improvements in our performance-based evaluation process. Over the next year, we will develop a strategy that will improve performance conversations and coaching leading to the implementation individual development planning. Our goal is to help employees identify their employment goals and the steps required to achieve those goals.

Our employee union representatives will be invited to join Employee Action Groups (EAG) to provide vital consultation during the development of our new performance evaluation and management practice. See timeline listed under goal 3E.

D. Implement training for key positions to support transition to 3rd-Party Property Management and 10-Year Redevelopment.

Our goal is to develop our transitioning staff to be competitive in the public/private job markets. To accomplish this goal, the authority has provided internal and external education and training opportunities to help them increase their competence and people skills.

Properties that are transitioning to 3rd-party property management will be identified; key positions and employees will be identified for training. VIHA will conduct a needs analysis to identify training and development needs of employees. Training content will be curated or developed. VIHA will oversee training and development plan to ensure training needs are being met. Throughout the training phase, course(s) and content will be evaluated to determine return on investment.

E. Update Personnel Policy to implement progressive performance evaluation with reward and recognition plan.

Having a consist performance evaluation, management, recognition, and reward practice is critical to the success of the authority. The practice must meet the organization where we are today with measurable steps that will help the authority transition to a performance evaluation and management process tied to measurable objectives and key results for each area of operations. In addition, employees and union must be engaged in the process from the start. To accomplish this, an employee action group will be established.

VIHA has hired a Director of Administration responsible for human resources, procurement, training, legal, and strategy. This first step in developing a new performance evaluation and management strategy is to gain buy-in at all levels of the organization. To accomplish this, an Employee Action Group (EAG) consisting of managers, skilled and professional employees. The group will be responsible for evaluating our current state, highlighting gaps in process, workflow, and systems, and reimaging the future state and inform our strategy, change, training, and communication plans. Plans will be vetted with VIHA's union representatives.

All employees will receive training on the new performance evaluation and management practice in the fall of 2023. Supervisors will receive additional training related to coaching teams for performance. Year-End performance reviews will be conducted using the new practice.

During the first quarter of 2024, supervisors will receive training on employee engagement, creating development plans, recognition, and rewards.

6. Public Questions, Responses, and Comments

HUD mandates that all Public Housing Agencies (PHAs) must engage in consultations with Resident Advisory Boards (RABs) and consider their recommendations when formulating their Annual Plans. Furthermore, PHAs are obligated to conduct a Public Hearing, which allows various stakeholders, including residents, community leaders, and public officials, to review the Annual Plans and provide feedback and suggestions for inclusion in the plans.

In compliance with these requirements, the Virgin Islands Housing Authority (VIHA) organized a RAB board meeting in both St. Thomas and St. Croix on Friday, June 23, 2023. VIHA also actively participated in a Tri-Island Town Hall meeting, which was hosted by the legislature on Wednesday, August 30, 2023. Additionally, VIHA held a Public Hearing in both St. Thomas and St. Croix on Tuesday, September 5, 2023.

To ensure accessibility, VIHA made its FY2024 Annual Plan readily available on its official website, central offices, and community property management offices. Below, you will find the questions, answers, and public comments that VIHA received during this engagement process.

Resident Council and Resident Advisory Board

What other languages are the Annual Plan Translated to?

The plan are currently translated into Spanish

Are you able to translate them Creole?

Yes. VIHA translated the Annual Plans to Creole and made them available during the public comment period. Please provide the RAB with a list of acronyms.

Email and hard copies will be delivered to RAB members. https://www.hud.gov/about/acronyms What is the plan?

This is the plan. We are going to go over the plan with you tonight. If you have any questions, please contact us.

What is HOTMA? – Add to public comment document.

Housing Opportunity Through Modernization Act of 2016 (HOTMA) is aimed at providing benefits to tenants while reducing administrative burdens on public housing agencies (PHAs).

Why is the annual plan created?

The plan is an annual document that every Public Housing Authority (PHA) has to complete every year that directs our movement and actions for every department. In other words, the annual plan is a comprehensive guide to PHA policies, operations, and strategies for meeting local housing needs and goals. We are in the fourth (4th) year of our five (5) year annual plan cycle.

Where can we find the Urban Land Institute report?

The report can be found on VIHA's website and the Urban Land Institute's website.

Explain the Average Income by Asset Management Property (AMP) Table.

The average income divided by the average bedroom factor is equal to the average income for each household within an AMP.

Ms. Pelle, If I am reading this information right, then the average income for Marly Homes is \$15,000? Correct

What does EIR stand for?

Established Income Range. This is a number that comes from HUD, and we drop that into the table and then it is divided.

The table shows 102 occupied homes in Williams Delight. Is that correct?

Yes, that is correct

The 102 units listed as occupied in Williams Delight, that does not include homeowners, correct?

That is correct. Those are residents that are living there but have not purchased it yet.

Will this report list the number of purchased homes?

Yes, under the homeownership section.

The listing for the number of residents in Williams Delight, If our council needed to verify the number of children residing here, could we get that information from VIHA?

Yes, definitely. It could be broken down by age too.

If we submitted a request for that information, how long would it take?

No more than two days.

Why was the Youth Build program disbanded?

It was not disbanded, we applied but did not receive it. The dynamics of the program changed. It is one of the goals as we build capacity for our residents.

What if there is a unit between two homeowners that needs to be demolished? How would you go about doing that?

There is a second part to the plan after we do the demolition. We are going to start selling the empty lots.

Is the demolition at Williams Delight still focused on the east side of the community?

No, demolition will be throughout the community. Initially, demolition was limited to the east side of the community based on a structural analysis that was completed. Based on new information, we decided to do another structural analysis and hired a different company, which resulted in the identification of homes to be demolished that included the west side of the community.

Can someone purchase a home identified for demolition and do their own demolition?

The current application we have is to demolish rather than dispose of them. Yes, we could create a plan that would say, "we are going to dispose of the buildings to individuals, and they will be responsible for the demolition.

What happens if we sell the structurally damaged house, and the new owner does not demolish the unit in a timely manner?

We would have to establish a timeframe for the new owner to complete the demolition; otherwise, it would become a blight for the surrounding area.

Could you have a contract that stipulates the demolition schedule as part of the closing?

Yes, we could do that legally. It is complicated but the short answer is yes a unit scheduled to be demolished could be sold "As Is" and the new homeowner is responsible for the demolition. The contract could stipulate that if the demolition and rebuilt are not completed within a predetermined timeframe, the ownership of the land and building would revert back to VIHA.

Should we add that to the plan?

We are going to add that into the RAB Board Resident Counsel comments, but we have to include additional narrative.

Jimmy Miller, do we have to get approval to implement this?

Yes, it would have to be added to the Section 18 application. We want a timeframe for homeowners to complete the demolition. We do not want an eye sore of units that have not been demolished. Jimmy: We just did that for New Haven a couple of weeks ago. We are selling "As Is" and then there is a timeframe for those units to be demolished and rebuilt.

We would have to have another appraisal done of the land and building to calculate the "As Is" price for the land and building. Those appraisals would have to be completed before we submit the Section 18 plan to HUD. We would want it to be available to all buildings identified for demolition.

So, the homes are going to be reappraised?

The lots with buildings that have to be demolished will need to be reappraised to determine a price. The original plan is still in place. We will look at a new plan to sell lots with buildings that have to be demolished. Some of our units are in a flood zone. If you decide to purchase a home in the flood zone, are they priced lower?

No. As long as they are not structurally affected, will sell them as long as the homeowners has flood insurance. Could we have different values for homes in the flood zone? Yes, if VIHA wishes to do that. Homes are already being sold below market value prices.

I am waiting for a reimbursement from VIHA. What can I do to speed up the reimbursement process? You do not have to do anything. Jimmy, she could still go through the other part of the process, right? We have a priority list, and we have to do the survey and appraisal.

Are we going to have after school programs in our community (Williams Delight) as of January 2024? Yes, the program will start in 2024, but unfortunately Williams Delight is not on the first round of communities that is being rolled out in January 2024. However, residents of Williams Delight will have access to these community centers and be able to take advantage of our academic support.

How will are students get to the center?

Those are challenges we have to address. For now, the official answer is that there after school buses, or parents will have to provide transportation.

Why wasn't Williams Delight selected for this program?

Our selection process considered two community characteristics; (1) we looked at the community profiles. We discussed the demographics and the number and school age of children living within each community. (2) We assessed and surveyed each community.

Community assessments and surveys were completed, and when we applied for the grant, we identified the communities that had the greatest need. At the time Williams Delight did not have a greater need than the other communities.

How about doing something about the older people who have not finished school? Could we create a program that serves this population?

You are highly active resident council. You can help push our needs. Absolutely, if you meet with your community and identify this as a need, we can help secure funding to implement. We are going to be guided by you (resident councils). We work with you to identify funds and spacing.

What is the JFK Blast Zone?

JFK is located in Christiansted near the WAPA Electric Utility Plant, where large amounts of propane are stored. A blast zone is an area in which there may be a danger to any person or property from flying material, or any other hazardous condition resulting from a blast. We cannot rebuild units that are inside of this zone.

I am listening to all of the upcoming demolition and redevelopment, we are presently back into another hurricane season. The roofs still need to be fixed under the FEMA from 2017. I am not hearing anything about repairs from 2017 and we are now in 2023 hurricane season. What is happening to the FEMA pending repairs from 2017?

We started some of the FEMA repairs in Williams Delight, to date we have completed 12 and there are another 8 that are pending. FEMA repairs are ongoing.

Could we find out which residents are in the list of 8?

Because Williams Delight is such a big community, I think the PW for that is over 300 pages. So, we are just going down the list. Yes, I can get the list for you.

Will residents be notified when the work is going to be done?

Yes, just like we did for the others that have been repaired.

Senate Tri-Island Town Hall Meeting on VIHA's Annual Plan

I understand that VIHA is verifying household income to determine if they are considered over-income. Some of the residents in Williams Delight have been waiting for more than ten (10) years to purchase their home. How will this affect us?

Regarding the lapse of time for individuals that are participating in the homeownership program at Williams Delight, the calculation for their rent will be done effective January 1, 2024. If a family is deemed over-income we have to verify they can afford something at market rate. I would think the purchase of your home would fall into the market rate category.

Families renting public housing units will still have to go through the over income process. Correct? Yes, that is correct.

What will happen to the residents who has been on the waiting list for homeownership, should they fall within the gap of "over income" residents?

Response: We have a time frame of practically four (4) months to purchase if this policy is to be activated. Will these residents be exempt?

We have confirmed with HUD, no exemptions will be allowed.

There is a housing crisis in the Virgin Islands. Where will over-income households go?

Under HOTMA, when a household's income exceeds 120 percent (120%) of Area Median Income (AMI), housing authorities have the option to offer them a new lease with the rent being the Fair Market Rent (FMR) or an amount of monthly subsidy for their unit including amounts from the operating and capital fund (the subsidy amount). The effective date of those provisions will be January 1, 2024.

When can we anticipate putting locals in affordable single family housing units, the single family structures? This is a question for the Virgin Islands Housing Finance Authority (VIHFA).

Deconcentrating of Poverty

HUD deconcentrating of poverty: Have you identified that the issue is a matter of underemployment, or not making enough money? Have any efforts been made to access and increase the minimum wage? Is that part of the conversation being held?

It is a little be of both, some do not make enough money, some individuals could use an

increase in the minimum wage, but that's not something that we as a housing authority has lobbied but it is something that our territory or elected officials can lobby for.

What is the income limit that you are considering to be high? 120% over what level is that? Is it different in each district (STX, STT, STJ)?

The income limits are different between districts. Based on family households of 1, 2 and 3, their income levels cannot exceed certain levels. The housing authority's goal is to ensure we are meeting the mandate set by HUD as it relates to ensuring that we are housing low-income families. We all know that territory wide there is a housing shortage, so the housing authority has to make sure we are not putting an undue burden on the territory as it relates to evicting families because they are doing good. We want individuals to work and make good money, and there are individuals in public housing making exceptionally good money (a good

living), but we have to make sure we are adhering to HUD guidelines.

<u>Homeownership</u>

Do you not get any credit towards the purchase price if you have been a long-standing tenant? No, you do not.

Have you ever considered that (Rent-to-Own) because it is a good point?

The individual go through a prequalification process. She is right, the bank had a program that offered assistance to families to purchase homes. We recognize the assistance from rural development, VI Slice, First Bank Home Buyer Program. In the plan we discuss the ability for the housing authority to do the loan, like we have done in the past. So, in her case once we determine that she can afford the payments, we would do the loan ourselves. There is discussion in the plan about having that option.

The other thing that crossed my mind was subsidies.

There is language in the plan about that.

Pursuit of homeownership in OHC: Housing Act 1937 amended in 1998 Provision in Section 32 allows residents to purchase units they are living in. Does it apply to the Virgin Islands?

Yes, it does apply to the Virgin Islands.

What is stopping us from making that a possibility for the residents in OHC, or in public housing communities that have aged?

This has to be submitted to HUD for its approval.

Oswald Harris Court needs to have homeownerships for all residences, not just the flat units but the twostory units as well as the three-story units. Residents have expressed a desire to own their units. Homeownership is necessary. We have been paying rent for years and in the same place. If you are building, build more flat houses in Oswald Harris Court. If we go to the bank, some of us will not qualify. It is not fair, the focus is more on St Croix homeownership, not St. Thomas or Oswald Harris Court.

VIHA is reviewing the option for this site.

Who advocates or goes to HUD to let them know what are specific challenges are in the territory on behalf residents?

We do and this Public Comment process is part of the engagement of people like the individuals they have chosen for resident council, resident commissioners that are on our board for those individuals to have a voice at the table and to the federal

government about what and how they are affected by federal rules and regulations.

Can the housing vouchers be used to pay the mortgage when homeownership of Lovenlund Apartments materializes?

The Housing Choice Voucher (HCV) homeownership program allows families that are assisted under the HCV program to use their voucher to buy a home and receive monthly assistance in meeting homeownership expenses. To participate in the HCV homeownership program, the HCV family must meet specific income and employment requirements (the employment requirement does not apply to elderly and disabled families), be a first-time homeowner as defined in the regulation, attend and satisfactorily complete the pre-assistance homeownership, and housing counselling program required by the PHA, and meet any additional eligibility requirements set by the PHA.

Why are the abandoned units being demolished? Have the units been inspected? Who made the final decision for demolition?

A structural and architectural investigation of Williams Delight units in May 2022 by Dynotec, a prior structural report by Creative Housing Solutions in 2019 of the units on the East side, and an assessment by VIHA staff

on certain selected units in 2023 are the basis for determining that 183 are not suited for renovation and should be demolished. VIHA made the final decision.

Could VIHA auction abandon homes (investigate the date of last occupancy and reason for abandonment; provide a list of major issues to interested buyer)?

VIHA cannot auction abandoned homes.

How is pricing determined on abandoned units? What is the value of the cistern and land?

Pricing and value are determined from an appraisal.

What about renters not interested in purchasing and wanting to remain in their unit? Why can't they remain renters? Renters and homeowners live amongst each other all the time. Not to mention this should and will encourage the renters to elevate? We in WD are family and we feed off each other...some may disagree, but our environment and surroundings have a lot to do with us developing as individuals. (example homeowner leaving next to a renter in strawberry)

Williams Delight was petitioned to HUD to become a Homeownership site and thus, was approved. All the homes should be sold.

What about those who are not knowledgeable on how to get through life without the help of the system? We contact each family and work with them to make sure they are made aware of the options to purchase a home.

Redevelopment

When residents are asked to move out because their unit will be demolished, they are told they will have first preference. However, that not the case. Are these agreements in writing (we are lying to our residents)? I can only speak for what is happening now, and those agreements are in writing as part of the HUD approval for the relocation and redevelopment.

Where do the people of deChabert go?

They have a right to return, but not to the same site. Due to the site's proximity to WAPA Propane tanks, it has been classified as a blast, and we cannot replace all the units in this community. We will build new units for those residents on the land that was swapped and is located mid-island.

Will there be a consideration for single-family home developments or condos/apartment for purchase on both islands?

Not at this time.

General Questions

Is there any plan to expand employment opportunities for residents under the new construction projects for VIHA?

There are only three vouchers available to the Re-entry Program. The Housing Authority is losing out on millions of dollars that could supplement this area, as well as homelessness in the Virgin Islands. Are there any upcoming provisions in the plan to assist the re-entry program for offenders coming back into the community to rehabilitate? In April 2023, HUD outlined requirements for PHAs to ensure that people with criminal records had the opportunity to access public housing. Where are VIHA's new policies addressing re-entry?

The housing authority sits on the re-entry committee. I continue to advocate for Ms. Marsh to have her comments in the plan for consideration.

The plan does not currently address this issue or the policy change, her will be added to the plan. We have updated the plan with additional information regarding CoC.

I feel residents should be given the opportunity to schedule Unit Inspections. It is obvious in the news that people in general are not as Reliable and Trustworthy as in the past. I have returned home from work to find my unit with lights on and things moved around on days of Inspections. I would like to arrange specific and individual days for Inspections by appointment. This way Residents can request time off from work to be home when strangers (Inspectors are entering their Apartments).

We provide adequate notice for resident planning purposes.

VIHA is below 60 in PHAS. Why are we sub-standard? How do we get above standards?

Evictions based on over income is not specific to VIHA, all housing authorities. We are not the only ones complaining about the policy. We will continue to voice our public concerns.

In regard to the low scoring, the areas we failed was mostly with our physical components. HUD annual inspections happened after COVID, and a lot of housing authorities were not happy and lost points. The other area causing us to fail is rent collection. We are not collecting our rent. During COVID there was no collection of rent, no one could be evicted. Now we are asking people to go into repayment plans to allow us to get back to where we need to be to satisfy HUD policy. Occupancy, we have passed the threshold where we should have been. We are now over 90%, which will give us additional points. We are continuing to remedy situations that impacted our scores. HCVP has always been high performing, and we have put corrective action plans in place to address issues that impacted our scores.

How are we dealing with issues related to violence and crime prevention? How is this going to be addressed? In the plan there is discussion Under resident wellness, in regard to coordination with VIPD and the gun violence task force.

The plan was updated to provide a more information on our crime prevention plans.

Payment Kiosks are available for residents to utilize to pay their rent and there will be a processing fee. However, this processing fee will no doubt create a hardship for residents. Please consider removing any fees when using the kiosk to pay rent or completing any other transactions.

The service fee for utilizing the kiosk is \$4.95 when using a Debit card, or 2.95% when using a credit card. These fees are lower that fees residents are charged now to pay by phone.

НОТМА

What is HOTMA?

Housing Opportunity Through Modernization Act of 2016 (HOTMA) is aimed at providing benefits to tenants while reducing administrative burdens on public housing agencies (PHAs).

When will HOMA over-income in public housing go into effect?

The over-income provision becomes effective 30 days after the rule's publication, and the 30-day clock will not start until the rule is officially published in the Federal Register.

Which programs are impacted?

Rental assistance programs administered by HUD's Offices of Public and Indian Housing (PIH), Multifamily Housing (MFH), and Community Development and Planning (CPD), including the Housing Choice Voucher (HCV), Public Housing, Section 8 Project-Based Rental Assistance (PBRA), Section 202/811, HOPWA, HOME, and the Housing Trust Fund programs are all impacted in some way by this final rule.

What does the rule do and when does it become effective?

<u>Changes related to Sections 102 and 104</u> (effective January 1, 2024): Modifies the rules for determining household income and assets in HUD's HCV, Public Housing, PBRA, Section 202/811, HOPWA, HOME, and Housing Trust Fund programs. These changes affect household eligibility and rent payments. These sections also set limits on assets for families assisted under the HCV, Public Housing, and Section 8 PBRA programs

<u>Changes related to Section 103</u> (effective 30 days after publication): Imposes continued program participation limits for families exceeding the statutory income limitation in the Public Housing program, also known as the "over-income" provision. (PHAs have an additional 120 days after the effective date to fully implement the changes.)

What are some of the ways HOTMA benefits tenants?

These HOTMA provisions support and incentivize tenant earning and savings goals. Assisted tenants are allowed to accumulate significant savings under the new asset limit, and retirement accounts and educational savings accounts are excluded from that limit. As a result of the changes in the interim and annual re-examination rules, families can also keep more of their earned income before receiving a rent increase.

HOTMA expands hardship provisions benefiting tenants. PHAs will be able to grant hardship relief to families unable to pay rent because of unanticipated medical/disability expenses or who are no longer eligible for the childcare expense deduction.

What are some of the ways HOTMA reduces administrative burdens for PHAs?

HOTMA streamlines the rules for determining household income and rent payments, which will free up resources that may be used to maintain units, support families' housing searches, or perform other essential functions.

Specifically, the new rules will:

- Only require each adult household member to sign a consent form one time, instead of annually.
- Enable PHAs/owners to use income determinations made under other federal benefit programs, which will eliminate redundant work.
- Simplify income deductions and allow families to self-certify assets up to \$50,000.
- Reduce the frequency of interim income recertifications.

Public Comments

Explain Family Self-Sufficiency Program (FSS): There is an entire section in the plan on Family Self Sufficiency (FSS). Right now, the plan discusses serving 25 low income public housing and housing choice voucher program families. It is a voluntary program that allows families to set aside a portion of their rent to achieve goals they set for themselves set. We coordinate with our FFS Coordinator and them, and they go through a process of learning, teaching, guiding them into what they do with this money and part of that can go towards homeownership. It is not just on public housing but housing choice voucher program, so it is in both plans.

We have a minimum of 25 slots, our goal is to get to 35. The number may seem low, but the amount of intensive services that are provided over a 5 to 10 year period means that there is only so many people that can be accommodated. However, we have people who are coming into the program on rolling out

consistently. The purpose of the program is to help people increase their earnings, through vocational training, education, certification, or opening their own business. Individuals who are able to increase their earning may potentially see an increase in their rent. With this program rent can be set aside or reimbursed if in section 8 until they complete the program. The money is returned to them to use how they please upon completion of the program. Most are interested in leveraging those funds to move into homeownership. A meeting was recently held in the Williams Delight community to ensure residents were aware of the program and its benefits. This is one way VIHA is working to help residents in Williams Delight achieve homeownership.

Bill 210173 – it is a rent to own public housing conversion program that was done in the 21st legislature. So, everything I am hearing tonight is in this bill, so it is on the legislatures to get the housing people to follow this bill. Bill 210173 Virgin Islands Rent to Own Public Housing Conversion Program, done in 1996. The problem is people played politics, so instead of implementing through HUD, they just gave it to the people like you can just own your home. It even had a schedule were if you lived in public housing for 20 years, you could purchase your home for a dollar. ACT #6111 were the time you in housing goes towards the purchase of your home.

- On behalf of members working for the government overs years that have dedicated their life being a fireman, policeman, teacher, community leader that have paid their rent faithfully, and 30 years later they have nowhere to go. If we are living in paradise, we should live in communities were things should be better. Shouldn't this be a recommendation of some kind of credit score, just being on time and dedicated. Knowing their income is not as much as expected, because you know what the salaries are. I feel we should consider these people who have put in the time and worked hard and passed it over from generation to generation knowing this could help a Virgin Islander.
- I have been a resident of Williams Delight for years. I am on the resident council. I was raised in Williams Delight from 12 years old. I wanted to raise my children there. Homeownership came up in 2013 when I was to own my home and it did work out. Three times I tried to own my home. Time is of the essence. Time is money. I have concerns pertaining to time, from 2013 to 2023, trying to own my home. Three times I went to lenders and got approved and the windows closed because of time. I am going through the process time again. When I enter meetings with VIHA, I usually say, "Your language" you need to explain it to me. Language changes from one extreme to the next. Things have changed over time, so has our income.
- Oswald Harris Court my aunt's unit, the shower water cold, the heater does not work, low water pressure.
 It is a problem here, let's raise the rent but you can't fix anything. That's unfair and unjust. Our government has us here struggling and it is a hurtful thing. Tortola government was able to build a house for my family in 1 ½ months.
- VIHA needs to hire electricians, plumbers, landscapers and not helpers. The after hour emergency number is in PR and in Espanol.
- The residence of Paul M. Pearson's co-op units are interested in resuming conversation about homeownership. The decision made by the board was not a true representation of all the residents in the community.
- I was present at the STT Town Hall on Wednesday, Aug 30. I spoke with you, briefly, at the end. I am hoping to bring the model of cooperative housing to the conversation, as it is intended to address matters of

affordable housing, the housing crisis, and home ownership. It is a citizen-driven concept, nevertheless it would be helpful if leadership were aware of it. I was told by a few senators that cooperative housing has been incorporated into a few communities on STT. However, based on the information given, I do not think this is exactly correct. The cooperative housing model (either non-profit or limited equity) is a citizen-driven, community-oriented approach that keeps property out of the speculative market. There are challenges, to be sure, but the model has perpetuated for decades in NYC, Montreal, Vancouver, and across Europe. Cooperative housing has allowed residents and families to stay in their cities when inflated housing prices would have otherwise driven them out.

- Do not demolish all units in Williams Delight. Homes on the east side is where they're looking to demolish.
 These homes do not need to be demolished.
- While we are waiting to become homeowners in Williams Delight, how about fixing our roads, putting sidewalks in, building a playground, adding lights? Fix up our community, this will attract potential buyers...Put the homes up for auction. All of the homes have cisterns, people are using that water. You are only replacing half of the homes that you plan to demolish.
- Instead of demolishing homes in Williams Delight add a laundry on the east and west side and leverage some buildings as storage for residents during hurricanes.
- Williams Delight needs to be built-up, then converted to homeowners' community (homeowners association)

C1. Capital Improvements

See HUD Form- 50075.2

U.S. Department of Housing and Urban Development Office of Public and Indian Housing 2577-0274

Status:	Approved Approval Date: 08/	/17/2023 Ap	proved By: CORD	OVA, ANTONIO		02/28/2022
Part	I: Summary					
	Name : VIRGIN ISLANDS HOUSING AUTHORITY Number: VQ001	Locality (City/C X Original 5-Y	=	Revised 5-Year	Plan (Revision No:)
А.	Development Number and Name	Work Statement for Year 1 2023	Work Statement for Year 2 2024	Work Statement for Year 3 2025	Work Statement for Year 4 2026	Work Statement for Year 5 2027
	AUTHORITY-WIDE	\$5,639,489.90	\$4,696,270.74	\$4,739,489.90	\$4,820,125.80	\$4,914,489.90
	TUTU HIGHRISE APTS (VQ001000012)	\$4,682,734.16	\$4,900,000.00			
	ESTATE BOVONI APARTMENTS (VQ001000013)	\$476,017.94	\$370,909.26			
	PAUL M PEARSON GARDENS (VQ001000014)	\$90,034.00	\$213,363.00	\$1,050,000.00	\$1,818,150.20	\$1,723,786.10
	MICHAEL J. KIRWAN TERRACE (VQ001000015)		\$220,000.00	\$600,000.00	\$1,500,000.00	\$1,500,000.00
	LOUIS E. BROWN VILLAS (VQ001000023)		\$360,000.00	\$998,786.10	\$2,500,000.00	\$2,250,000.00
	WALTER I.M. HODGE PAVILION (VQ001000024)		\$127,733.00			
	JOHN F. KENNEDY TERRACE (VQ001000022)			\$3,500,000.00		
	OSWALD E. HARRIS COURT (VQ001000011)				\$250,000.00	\$500,000.00

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Part II: Sup	oporting Pages - Physical Needs Work Statements (s)			
Work Statement for Year 1 2023				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$5,639,489.90
ID0029	Management(Management Improvement (1408)-Staff Training)	Management Improvement		\$45,000.00
ID0030	Administration(Administration (1410)-Other,Administration (1410)-Salaries)	Administration		\$1,088,827.60
ID0032	Operations(Operations (1406))	Operating Budget		\$2,077,298.20
ID0046	Fees & Cost (Contract Administration (1480)-Other Fees and Costs)	A&E Services, Legal fees, Consultants		\$1,528,364.10
ID0071	Stony Grounds(Dwelling Unit-Development (1480)-Site Acquisition)	Acquistion of Stony Ground-39 Acre will develop in several phases to include Public Housing Units		\$900,000.00
	ESTATE BOVONI APARTMENTS (VQ001000013)			\$476,017.94

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work Statement for Year 1 2023						
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost		
ID0037	AMP 13-VQ1-19/Bovoni(Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Interior (1480)- Other,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Interior (1480)-Other)	REAC/UFAS Repairs-Critical Repairs		\$233,695.00		
ID0142	AMP 11-VQ 5-/Oswald Harris Court(Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Other,Non-Dwelling Interior (1480)-Other)	REAC/UFAS Repairs-Critical Repairs		\$242,322.94		
	TUTU HIGHRISE APTS (VQ001000012)			\$4,682,734.16		
ID0041	AMP 12- VQ1-16/Estate Tutu Hi-Rise Apartment(Dwelling Unit - Demolition (1480))	Demolition of units- Phase II		\$356,222.80		
ID0107	AMP 12- VQ1-16/Estate Tutu Hi-Rise Apartments (Dwelling Unit - Demolition (1480))	Demolition of units- Phase III		\$2,326,511.36		
ID0140	AMP 12 VQ 1-16 /Estate Tutu Senior(Dwelling Unit - Demolition (1480))	Demolition		\$2,000,000.00		
	PAUL M PEARSON GARDENS (VQ001000014)			\$90,034.00		

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work Stater	Work Statement for Year 1 2023					
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost		
ID0141	AMP 14-VQ1-01/Paul M Pearson garden(Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Interior (1480)-Other)	REAC/UFAS Repairs-Critical Repairs		\$90,034.00		
	Subtotal of Estimated Cost			\$10,888,276.00		

Part II: Sup	oporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 2 2024					
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost	
	AUTHORITY-WIDE (NAWASD)			\$4,696,270.74	
ID0002	Operations (Operations (1406))	Operations Budget		\$2,077,298.20	
ID0003	Administration(Administration (1410)-Other,Administration (1410)-Salaries)	Asset management fees		\$1,088,827.60	
ID0004	Fees and Costs(Contract Administration (1480)-Other Fees and Costs)	A& E Services, Consultants & Legal Fees		\$1,485,144.94	
ID0110	Management(Management Improvement (1408)-Staff Training)	Management Improvement		\$45,000.00	
	TUTU HIGHRISE APTS (VQ001000012)			\$4,900,000.00	
ID0109	AMP 12- VQ1-16/Estate Tutu Hi-Rise Apartment(Dwelling Unit - Demolition (1480))	Demolition of units- Phase II		\$4,543,777.20	

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work Statement for Year 2 2024						
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost		
ID0111	AMP 12- VQ1-16/Estate Tutu Hi-Rise Apartments (Dwelling Unit - Demolition (1480))	Demolition of units- Phase III		\$356,222.80		
	ESTATE BOVONI APARTMENTS (VQ001000013)			\$370,909.26		
ID0143	AMP 13-VQ1-19/Bovoni(Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Site Work (1480)- Other,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Interior (1480)-Other,Dwelling Unit- Exterior (1480)-Other)	REAC/UFAS Repairs-Critical Repairs		\$202,553.26		
ID0152	AMP 13-VQ1-19/Bovoni(Dwelling Unit-Interior (1480)-Other)	504 Repairs (Widen bedroom door entrance, install grab bars, widen bathroom door, accessible kitchen and bath cabinets)		\$168,356.00		
	PAUL M PEARSON GARDENS (VQ001000014)			\$213,363.00		
ID0144	AMP 14-VQ1-41/HH Bergs Home(Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Other,Non- Dwelling Interior (1480)-Other)	REAC/UFAS Repairs-Critical Repairs		\$103,363.00		
ID0145	AMP 14-VQ1-11/Lucinda Millin Home(Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Interior (1480)-Other)	REAC/UFAS Repairs-Critical Repairs		\$110,000.00		

Part II: Sup	oporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 2 2024					
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost	
	MICHAEL J. KIRWAN TERRACE (VQ001000015)			\$220,000.00	
ID0146	AMP 15-VQ1-07/Kirwan Terrace(Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Interior (1480)-Other)	REAC/UFAS Repairs-Critical Repairs		\$110,000.00	
ID0147	AMP 15-VQ1-44/Contant Knolls(Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Interior (1480)-Other,Dwelling Unit-Exterior (1480)-Other)	REAC/UFAS Repairs-Critical Repairs		\$110,000.00	
	LOUIS E. BROWN VILLAS (VQ001000023)			\$360,000.00	
ID0148	AMP 23-VQ1-12/Aureo Diaz Heights(Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Interior (1480)-Other)	REAC/UFAS Repairs-Critical Repairs		\$125,000.00	
ID0149	AMP 23-VQ1-242/Candido Quadalupe(Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Interior (1480)-Other)	REAC/UFAS Repairs-Critical Repairs		\$125,000.00	
ID0150	AMP 23-VQ1-22/Mount Pleasant(Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Interior (1480)-Other,Dwelling Unit-Exterior (1480)-Other)	REAC/UFAS Repairs-Critical Repairs		\$110,000.00	

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s) Work Statement for Year 2 2024					
Work State						
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost		
	WALTER I.M. HODGE PAVILION (VQ001000024)			\$127,733.00		
ID0151	AMP 24-VQ1-10/Marley Homes & Addition(Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Interior (1480)- Other,Dwelling Unit-Exterior (1480)-Other)	REAC/UFAS Repairs-Critical Repairs		\$127,733.00		
	Subtotal of Estimated Cost			\$10,888,276.00		

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work State	ment for Year 3 2025					
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost		
	AUTHORITY-WIDE (NAWASD)			\$4,739,489.90		
ID0060	Operations (Operations (1406))	Operations Budget		\$2,077,298.20		
ID0061	Administration(Administration (1410)-Other,Administration (1410)-Salaries)	Asset management fees		\$1,088,827.60		
ID0062	Fees and Costs(Contract Administration (1480)-Other Fees and Costs)	A& E Services, Legal fees, Consultant & consulting fees		\$1,528,364.10		
ID0124	Management(Management Improvement (1408)-Staff Training)	Management Improvement		\$45,000.00		
	PAUL M PEARSON GARDENS (VQ001000014)			\$1,050,000.00		
ID0125	AMP 14-VQ1-01/Paul M Pearson Garden(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)- Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Dwelling Unit Interior		\$300,000.00		

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work Statement for Year 3 2025						
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost		
ID0127	AMP 14 VQ1-01/Paul M Pearson Garden(Dwelling Unit-Interior (1480)-Other)	504 Repairs (Widen bedroom door entrance, install grab bars, widen bathroom door, accessible kitchen and bath cabinets)		\$750,000.00		
	JOHN F. KENNEDY TERRACE (VQ001000022)			\$3,500,000.00		
ID0131	AMP 22- VQ1-8/John F. Kennedy Terrace(Dwelling Unit - Demolition (1480))	Demolition of units		\$3,500,000.00		
	MICHAEL J. KIRWAN TERRACE (VQ001000015)			\$600,000.00		
ID0153	AMP 15-VQ1-07/Michael J Kirwan Terrace(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)- Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Dwelling Unit Interior		\$300,000.00		
ID0154	AMP 15-VQ1-44/Contant Knolls(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)- Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Dwelling Unit Interior		\$300,000.00		
	LOUIS E. BROWN VILLAS (VQ001000023)			\$998,786.10		

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work Statement for Year 3 2025						
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost		
ID0155	AMP 23-VQ1-12/Aureo Diaz Heights(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Dwelling Unit Interior		\$400,000.00		
ID0156	AMP 23-VQ1-242/Candido Quadalupe(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Dwelling Unit Interior		\$400,000.00		
ID0157	AMP 23-VQ1-22/Mount Pleasant(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Dwelling Unit Interior		\$198,786.10		
	Subtotal of Estimated Cost			\$10,888,276.00		

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work State	ement for Year 4 2026					
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost		
	AUTHORITY-WIDE (NAWASD)			\$4,820,125.80		
ID0094	Operations (Operations (1406))	Operations Budget		\$2,077,298.20		
ID0095	Administration(Administration (1410)-Other,Administration (1410)-Salaries)	Asset management fees		\$1,088,827.60		
ID0134	Fees & Cost (Contract Administration (1480)-Other Fees and Costs)	A&E Services, Legal fees, Consultants		\$1,609,000.00		
ID0135	Management(Management Improvement (1408)-Staff Training)	Management Improvement		\$45,000.00		
	PAUL M PEARSON GARDENS (VQ001000014)			\$1,818,150.20		
ID0159	AMP 14-VQ1-01/Paul M Pearson Garden(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)- Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Dwelling Unit Interior		\$1,318,150.20		

-	oporting Pages - Physical Needs Work Statements (s)			
Work State	ment for Year 4 2026		i	1
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0165	AMP 14 VQ1-01/Paul M Pearson Garden(Dwelling Unit-Interior (1480)-Other)	504 Repairs (Widen bedroom door entrance, install grab bars, widen bathroom door, accessible kitchen and bath cabinets)		\$500,000.00
	MICHAEL J. KIRWAN TERRACE (VQ001000015)			\$1,500,000.00
ID0160	AMP 15-VQ1-07/Michael J Kirwan Terrace(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)- Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Dwelling Unit Interior		\$750,000.00
ID0161	AMP 15-VQ1-44/Contant Knolls(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)- Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Dwelling Unit Interior		\$750,000.00
	LOUIS E. BROWN VILLAS (VQ001000023)			\$2,500,000.00
ID0162	AMP 23-VQ1-12/Aureo Diaz Heights(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Dwelling Unit Interior		\$750,000.00
ID0163	AMP 23-VQ1-242/Candido Quadalupe(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Dwelling Unit Interior		\$750,000.00

Part II: Supporting Pages - Physical Needs Work Statements (s) Work Statement for Year 4 2026				
ID0164	AMP 23-VQ1-22/Mount Pleasant(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Dwelling Unit Interior		\$750,000.00
ID0166	AMP 23 VQ1-12/Aureo Diaz Heights(Dwelling Unit-Interior (1480)-Other)	504 Repairs (Widen bedroom door entrance, install grab bars, widen bathroom door, accessible kitchen and bath cabinets)		\$125,000.00
ID0167	AMP 23 VQ1-242/Candido Quadalupe(Dwelling Unit-Interior (1480)-Other)	504 Repairs (Widen bedroom door entrance, install grab bars, widen bathroom door, accessible kitchen and bath cabinets)		\$125,000.00
	OSWALD E. HARRIS COURT (VQ001000011)			\$250,000.00
ID0168	AMP 11 VQ1-05/Oswald Harris Court(Dwelling Unit-Interior (1480)-Other)	504 Repairs (Widen bedroom door entrance, install grab bars, widen bathroom door, accessible kitchen and bath cabinets)		\$250,000.00
	Subtotal of Estimated Cost			\$10,888,276.00

Part II: Supporting Pages - Physical Needs Work Statements (s) Work Statement for Year 5 2027				
	AUTHORITY-WIDE (NAWASD)			\$4,914,489.90
ID0115	Management(Management Improvement (1408)-Staff Training)	Management Improvement		\$45,000.00
ID0116	Administration(Administration (1410)-Other,Administration (1410)-Salaries)	Administration		\$1,088,827.60
ID0117	Operations(Operations (1406))	Operating Budget		\$2,077,298.20
ID0121	Fees & Cost (Contract Administration (1480)-Other Fees and Costs)	A&E Services, Legal fees, Consultants		\$1,703,364.10
	PAUL M PEARSON GARDENS (VQ001000014)			\$1,723,786.10
ID0169	AMP 14-VQ1-01/Paul M Pearson Garden(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)- Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Dwelling Unit Interior		\$1,223,786.10

Part II: Sup	oporting Pages - Physical Needs Work Statements (s)			
Work Statement for Year52027				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0175	AMP 14 VQ1-01/Paul M Pearson Garden(Dwelling Unit-Interior (1480)-Other)	504 Repairs (Widen bedroom door entrance, install grab bars, widen bathroom door, accessible kitchen and bath cabinets)		\$500,000.00
	MICHAEL J. KIRWAN TERRACE (VQ001000015)			\$1,500,000.00
ID0170	AMP 15-VQ1-07/Michael J Kirwan Terrace(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)- Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Dwelling Unit Interior		\$750,000.00
ID0171	AMP 15-VQ1-44/Contant Knolls(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Dwelling Unit Interior		\$750,000.00
	LOUIS E. BROWN VILLAS (VQ001000023)			\$2,250,000.00
ID0172	AMP 23-VQ1-12/Aureo Diaz Heights(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Dwelling Unit Interior		\$750,000.00
ID0173	AMP 23-VQ1-242/Candido Quadalupe(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)- Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Dwelling Unit Interior		\$750,000.00

Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work State	Work Statement for Year 5 2027				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost	
ID0174	AMP 23-VQ1-22/Mount Pleasant(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Dwelling Unit Interior		\$750,000.00	
	OSWALD E. HARRIS COURT (VQ001000011)			\$500,000.00	
ID0176	AMP 11 VQ1-05/Oswald Harris Court(Dwelling Unit-Interior (1480)-Other)	504 Repairs (Widen bedroom door entrance, install grab bars, widen bathroom door, accessible kitchen and bath cabinets)		\$500,000.00	
	Subtotal of Estimated Cost			\$10,888,276.00	

Part III: Supporting Pages - Management Needs Work Statements (s)		
Work Statement for Year 1 2023		
Development Number/Name General Description of Major Work Categories	Estimated Cost	
Housing Authority Wide		
Management(Management Improvement (1408)-Staff Training)	\$45,000.00	
Administration(Administration (1410)-Other,Administration (1410)-Salaries)	\$1,088,827.60	
Operations(Operations (1406))	\$2,077,298.20	
Fees & Cost (Contract Administration (1480)-Other Fees and Costs)	\$1,528,364.10	
Stony Grounds(Dwelling Unit-Development (1480)-Site Acquisition)	\$900,000.00	
Subtotal of Estimated Cost	\$5,639,489.90	

Part III: Supporting Pages - Management Needs Work Statements (s)		
Work Statement for Year 2 2024		
Development Number/Name General Description of Major Work Categories	Estimated Cost	
Housing Authority Wide		
Operations (Operations (1406))	\$2,077,298.20	
Administration(Administration (1410)-Other,Administration (1410)-Salaries)	\$1,088,827.60	
Fees and Costs(Contract Administration (1480)-Other Fees and Costs)	\$1,485,144.94	
Management(Management Improvement (1408)-Staff Training)	\$45,000.00	
Subtotal of Estimated Cost	\$4,696,270.74	

Part III: Supporting Pages - Management Needs Work Statements (s)		
Work Statement for Year32025		
Development Number/Name General Description of Major Work Categories	Estimated Cost	
Housing Authority Wide		
Operations (Operations (1406))	\$2,077,298.20	
Administration(Administration (1410)-Other,Administration (1410)-Salaries)	\$1,088,827.60	
Fees and Costs(Contract Administration (1480)-Other Fees and Costs)	\$1,528,364.10	
Management(Management Improvement (1408)-Staff Training)	\$45,000.00	
Subtotal of Estimated Cost	\$4,739,489.90	

Part III: Supporting Pages - Management Needs Work Statements (s)			
Work Statement for Year 4 2026			
Development Number/Name General Description of Major Work Categories	Estimated Cost		
Housing Authority Wide			
Operations (Operations (1406))	\$2,077,298.20		
Administration(Administration (1410)-Other,Administration (1410)-Salaries)	\$1,088,827.60		
Fees & Cost (Contract Administration (1480)-Other Fees and Costs)	\$1,609,000.00		
Management(Management Improvement (1408)-Staff Training)	\$45,000.00		
Subtotal of Estimated Cost	\$4,820,125.80		

Part III: Supporting Pages - Management Needs Work Statements (s)		
Work Statement for Year 5 2027		
Development Number/Name General Description of Major Work Categories	Estimated Cost	
Housing Authority Wide		
Management(Management Improvement (1408)-Staff Training)	\$45,000.00	
Administration(Administration (1410)-Other,Administration (1410)-Salaries)	\$1,088,827.60	
Operations(Operations (1406))	\$2,077,298.20	
Fees & Cost (Contract Administration (1480)-Other Fees and Costs)	\$1,703,364.10	
Subtotal of Estimated Cost	\$4,914,489.90	