Streamlined Annual PHA Plan (High Performer PHAs)

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires: 03/31/2024

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

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

Definitions.

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

A.	PHA Information.												
A.1	PHA Type: A High I PHA Plan for Fiscal Ye	Performer ar Beginning: on Annual Con	g Commission (GRHC) July 1, 2024 (GRHC Fiscal Year 20 tributions Contract (ACC) units at s: 203 Number of Housi										
	PHA Plan Submission Type: ⊠ Annual Submission □ Revised Annual Submission Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA												
	must identify the specific PHA Plan are available f information of the PHA pHA Plans, including up post complete PHA Plans. Locations where the pub hearing and proposed PH 1. GRHC Administrative 2. GRHC web site: www 3. GRHC asset managem Adams Park Apartn Antoine Court Apar Campau Commons Creston Plaza Apart Hope Community, Leonard Terrace Ap Mount Mercy Apart Ransom Tower Apar	clocation(s) who inspection by colicies contain dates, at each As on their official lic may view at IA Plan; the fine Office, 1420 Formore, 1440 Full themselves, 901 Dirapartments, 901 Dirapartments, 1080 Cr. 1024 Ionia SW, artments, 1315 ments, 1425 Birtments, 50 Rair	ere the proposed PHA Plan, PHA I with the public. Additionally, the PHA ed in the standard Annual Plan but used in the standard Annual Plan but used Management Project (AMP) and website. PHAs are also encourant addor obtain copies of the proposed at PHA Plan documents will also buller Ave. SE, Grand Rapids, MI ces: ter Ave. SE, Grand Rapids, MI vision Ave. S, Grand Rapids, MI Division Ave. S, Grand Rapids, MI 1 Division Ave. S, Grand Rapids, I seston Plaza Dr. NE, Grand Rapids	Plan Elements, and all information on hat excluded from their streamlined and main office or central office ged to provide each resident could PHA Plan, PHA Plan Elements be available at the locations below	on relevant to the public how the public may reasonate submissions. At a minim of the PHA. PHAs are strucil a copy of their PHA land and all information relevant	earing and proposed ably obtain additional num, PHAs must post rongly encouraged to Plans.							
	PHA Consortia: (Cl	neck box if sub	mitting a Joint PHA Plan and comp	· · · · · · · · · · · · · · · · · · ·	No. of Units in 1	E L D							
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	PH	HCV							
	Lead PHA:												
B.	Plan Elements												
B.1	Revision of Existing PH	A Plan elemer	nts.										
	(a) Have the following P	HA Plan eleme	nts been revised by the PHA since	its last Annual PHA Plan subm	nission?								

B.1 (cont.)	Y N □ ⊠ Statement of Housing Needs and Strategy for Addressing Housing Needs.
	☐ Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions.
	☐ Financial Resources.
	☐ Rent Determination.
	☐ Homeownership Programs.
	☐ Safety and Crime Prevention.
	☐ ☑ Pet Policy.
	☐ Substantial Deviation.
	☐ Significant Amendment/Modification
	(b) If the PHA answered yes for any element, describe the revisions for each element below.
	(c) The PHA must submit its Deconcentration Policy for Field Office Review.
	The GRHC's Deconcentration Policy is provided as Attachment A.
	Revisions to Policies that Govern Eligibility, Selection and Admissions
	During 2023 the Housing Commission approved the amendment of the HCV Administrative Plan Chapter 3, "Eligibility," Part II, "Basic Eligibility Criteria," 3.II-A, "Income Eligibility and Targeting" to allow households earning up to 80% of AMI to participate in the GRHC's HCV and PBV programs effective 10/1/2023. This change allows a low-income (80% AMI) family to be eligible for assistance if the family meets the other program eligibility criteria and makes the GRHC HCV Administrative Plan consistent with the City of Grand Rapids Consolidated Plan. The GRHC continues to adhere to income targeting requirements per 24 CFR 982.201(b)(2)(i) and the MTW Operation Notice Section 7(c)(i)(a). We will ensure that not less than 75 percent of assisted households are very low-income (50% AMI). The amended Chapter 3, Part II is included as Attachment B.
	During 2023 the Housing Commission approved a revision to the HCV Administrative Plan Chapter 7, "Verification," Section 7-III.D. "Alimony or Child Support," to change income verification from 60 calendar days prior to GRHC verification request to the previous year prior to GRHC request. This change supports efficiencies in HCV program operations. The applicable Chapter 7 section is included as Attachment C.
	During 2023 the Housing Commission approved a revision to the HCV Administrative Plan Chapter 17, "Project-Based Vouchers," to add a subsection within Part II: "PBV Owner Proposals," section 17-II.B. "Owner Proposal Selection Procedures," "Solicitation and Selection of PBV Proposals." The addition clarifies the types of properties that are eligible to receive a PBV award. The relevant section of Chapter 17 Part II is included as Attachment D, and the subsection that was added follows:
	PBV Project Definition
	All proposals must meet the definition of project as stipulated by HUD in 24 CFR 938.3(b):
	 A project is a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land. Contiguous in this definition includes "adjacent to" as well as touching along a boundary or point. Per 24 CFR 983.202, the only exception are single-family scattered site projects.
	The GRHC has determined that in efforts to meet critical housing needs, it will additionally adopt the United States Environmental Protection Agency's position on public right-of-way in terms of contiguous property: • Public rights-of-way (e.g., railroad, highway, street, alley, easement) do not prevent property from being considered contiguous.
	Tubile rights of way (e.g., famoua, nighway, succe, andy, easement) do not provent property from being considered contiguous.
	In November 2023 the Housing Commission approved the addition of a Chapter 20 to the GRHC's HCV Administrative Plan covering administration of an "Aim to Save" resident asset-building program the GRHC launched as the research focus of our activities as a HUD "Moving to Work" Demonstration Program agency. The Aim to Save Program will assess the impact of personal savings on assisted families' ability to maintain stable housing (see related reporting in the MTW Supplement included as Attachment E).
	HCV Administrative Plan Chapter 20, "Moving to Work," Part 1, offers details of the Aim to Save Program, including program eligibility and the mechanism for selecting program participants as well as program operating parameters. Part II of this chapter provides details of the MTW Waivers the GRHC selected as an MTW agency and reported in the GRHC 2023 MTW Supplement that was uploaded to the HUD Housing Information Portal last year. The new chapter is included in its entirety as Attachment F.
	During fall 2022 the GRHC was selected to participate in the HUD Moving to Work (MTW) Asset Building Cohort. In addition to launching an asset-building initiative that will empower a group of randomly selected households to build personal savings, the Housing Commission implemented a number of MTW waivers. We plan to implement the following additional waivers during the coming year:

Information Portal in April.

Details of planned waiver implementation is provided within Attachment E; the GRHC's 2024 MTW Supplement will be uploaded to the HUD Housing

B.1 (cont.)

Financial Resources

In December 2023 the GRHC applied to sell 15 LIPH Scattered Sites single-family homeownership units through the Section 18-Scattered Sites Asset Repositioning initiative; see Section B.2 of this plan for details. Funds from these sales will be used for rehabilitation and/or development projects.

Current allocations of Capital Funds allotted to GRHC are outlined in the Capital Fund Program Five-Year Action Plan approved on 2/27/23 (available in the HUD Energy and Performance Information Center (EPIC) Secure System). The GRHC is in the process of planning and implementing an asset repositioning strategy for our Low-Income Public Housing (LIPH) units. Depending on the repositioning option selected by GRHC, future Operating Funds and Capital Funds may be impacted. For example, a RAD Section 18 Blend would still provide Operating and Capital Funds under Asset Repositioning Fees and Disposition/Demolition Transitional Funding for a limited period. If Streamlined Voluntary Conversion is the repositioning option determined most viable, Section 9 funds (Operating and Capital) would no longer be available for use by the agency.

For more information about the GRHC's financial resources, please reference the Proposed Operating Budget for the fiscal year ending 6/30/24 included as Attachment G

During 2024 the GRHC plans to continue to implement funding flexibilities as permitted under the MTW designation and waivers that will impact financial resources due to administrative process changes (savings) and funding landlord incentives and vacancy losses (outlays). Specific waivers include:

Landlord Leasing Incentives:

- a. Vacancy Loss (HCV Tenant-Based Assistance). To incentivize a landlord's continued participation in the HCV program, the agency makes a vacancy loss payment equal to one month's contract rent available to the landlord..
- b. Other Landlord Incentives (HCV Tenant-Based Assistance). In order to encourage landlord retention and incentivize new landlords to join the HCV program, the GRHC offers a Landlord Incentive Program. The GRHC may target incentive payments to landlords leasing properties in high-opportunity neighborhoods or in areas where vouchers are difficult to use as defined in our Administrative Plan.

A summary of current and planned waiver implementation is provided in Attachment D; the GRHC's 2024 MTW Supplement is available on the HUD Housing Information Portal.

HOME-ARP Grant:

During June 2024 the Housing Commission authorized acceptance of a \$500,000 HOME-ARP Grant from the City of Grand Rapids. The grant was awarded in support of a planned renovation of the GRHC's Hope Community Rapid Re-Housing Program facilities.

B.1 (cont.)

Revisions to Policies that Govern Rent Determination

Effective January 1, 2024, the GRHC adopted Voucher Payment Standards (VPS) that are 110 percent of the HUD-established Kent County Fair Market Rents (FMRs) for Federal Fiscal Year 2024. The GRHC updated the Kent County utility allowances used in the Section 8 Housing Choice Voucher and Low-Income Public Housing programs in compliance with 24 CFR part 982.517. Current VPS and utility allowance schedules are included in Attachment H.

Effective January 1, 2024, the GRHC adopted Voucher Payment Standards (VPS) that are 110 percent of the HUD-established Ottawa County Fair Market Rents (FMRs) for Federal Fiscal Year 2024. The GRHC updated the Ottawa County utility allowances used in the Section 8 Housing Choice Voucher and Low-Income Public Housing programs in compliance with 24 CFR part 982.517. Current VPS and utility allowance schedules are included in Attachment H.

Effective January 1, 2024, the GRHC adopted flat rents that are 80 percent of the HUD-established Fair Market Rent (FMR) for Federal Fiscal Year 2024 for residents residing at our Low-Income Public Housing properties, Adams Park Apartments (MI073000001) and Scattered Sites (MI073000004). FY 2024 flat rents are included in Attachment H.

B.2 New Activities.

- (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year:
- Y N
- ☐ Hope VI or Choice Neighborhoods.
- ☐ Mixed Finance Modernization or Development.
- □ Demolition and/or Disposition.
- ☐ Conversion of Public Housing to Tenant Based Assistance.
- 🖾 🗀 Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
- ☑ Project-Based Vouchers.
- ☐ Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(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.

Adams Park Apartments (MI073000001), 188 units:

A 2021 architectural inspection of Adams Park Apartments revealed that a plan to renovate the 50-year-old development using HUD grants and funds leveraged through federal Low-Income Housing Tax Credits may not be feasible due to the age and condition of plumbing and electrical systems that were built beneath the structure; these would not be replaceable in the event of failure.

During the year ahead the GRHC will continue to plan for the total redevelopment of the 188-unit development. We anticipate that redevelopment financing will include HUD grants as well as LIHTC; the GRHC may choose to pursue funding through the Choice Neighborhoods program. We anticipate that the redevelopment process will take several years and will explore whether Streamlined Voluntary Conversion, a RAD/Section 18 Blend strategy or similar conversion option would be optimal for this development. During February 2023 the GRHC finalized an agreement with a development consultant/partner to assist with asset repositioning for Adams Park.

Adams Park is located at 1440 Fuller Ave. SE in Grand Rapids. Populations served and unit size and distribution will be determined during the planning process.

It is anticipated that conversion will require tenant relocation. Tenants will receive all applicable assistance available through the Uniform Relocation Act, including a Tenant Protection Voucher (TPV) and help locating comparable housing.

Hope Community Rapid Re-Housing Program, 24 units:

The GRHC continues to seek public and private funding and in-kind donations to support a \$2.4 million renovation of our Hope Community Rapid Re-Housing program facilities. The GRHC may elect to seek funding through the LIHTC and/or Choice Neighborhoods programs.

During March 2023 the GRHC was awarded a \$500,000 HOME-ARP Grant from the City of Grand Rapids in support of renovations at the Hope Community Service Center; procurement of needed repairs and improvements is underway.

Hope Community includes 24 units located at 1024 Ionia Avenue SW (12 units), 34/38 Albany St. SW (2 units), 35/37 Shelby St. SW (2 units), 43/47 Canton St. SW (2 units), 106/108 Putnam St. SW (2 units), 1043/1045 Ionia Ave. SW (2 units), and 1106/1108 Ionia Ave. SW (2 units). Hope Community serves families experiencing homelessness; we will continue to serve this population after renovation. Bedroom distribution at Hope Community is (and will remain):

- 12 modular units.
- Two-bedroom duplex units (6 units).
- Three-bedroom duplex units (6 units).

B.2 (cont.)

It has not yet been determined whether renovations will require tenant relocation. If relocation becomes necessary, tenants will receive all applicable assistance available through the Uniform Relocation Act.

The redevelopment of Adams Park and renovation of Hope Community support the following 2020-2024 Five-Year Plan goals:

Community Planning: "Address a community need cited in the Kent County, City of Grand Rapids and City of Wyoming Regional Consolidated Housing and Community Development Plan by making affordable housing opportunities more available to low-income and very low-income families."

Maintenance: "Maintain the Housing Commission real estate in good condition."

Scattered Sites (MI073000004), 15 units:

The GRHC currently has 15 single-family Scattered Sites units that are included in an existing home ownership program. During December 2023 the GRHC applied to dispose of these units through a Section 18-Scattered Sites Asset Repositioning initiative. If HUD does not approve the disposition of the Scattered Sites units, the GRHC will strategize other options for rehabilitation and occupancy, which may require the units to be offline temporarily.

The units slated for disposition are:

All homes have three bedrooms with the exception of 716 Thomas St. SE, which has four bedrooms.

442 Adams St. SE650 Henry Ave. SE1127 Kalamazoo Ave. SE21 Shelby St. SE831 Bates St. SE1128 Fisk St. SE448 Oakdale St. SE716 Thomas St. SE424 Griggs St. SE2125 Francis Ave. SE461 Oakdale St. SE808 Woolsey Ave. SW500 Crawford St. SE2144 Horton Ave. SE465 Oakdale St. SE

The units will be offered for sale as follows:

- 1. Sale to the existing tenant(s) (first right of refusal) under the current homeownership program.
- 2. Sale to residents who are participants in the GRHC's Family Self-Sufficiency program at fair market value.
- 3. Sale to other eligible low-income households (income at or below 80% of Area Median Income) at fair market value.

Under the potential disposition strategies noted above, the current tenant may be eligible to receive a Tenant Protection Voucher (TPV) or relocation assistance under the Uniform Relocation Assistance & Real Property Acquisition Act. A tenant who qualifies for the GRHC's HCV Homeownership Program may use the TPV to meet mortgage eligibility requirements and apply HAP payments toward mortgage payments. Where relocation is necessary, GRHC will ensure assistance under the Uniform Relocation Act to help the tenant move to a comparable safe, sanitary and affordable dwelling unit.

The conversion of these Scattered Sites units support the following specific goals in our 2020-2024 Five-Year PHA Plan:

Maintenance: "Maintain the Housing Commission real estate in good condition."

Community Planning: "Address a community need cited in the Kent County, City of Grand Rapids and City of Wyoming Regional Consolidated Housing and Community Development Plan by making affordable housing opportunities more available to low-income and very low-income families."

Project-Based Voucher Program

During October 2023 the Housing Commission approved a revision to the HCV Administrative Plan Chapter 17, "Project-Based Vouchers," to add a subsection within Part II: "PBV Owner Proposals," section 17-II.B. "Owner Proposal Selection Procedures," "Solicitation and Selection of PBV Proposals." See details in Section B.1 of this Plan (page 2).

In an effort to expand the inventory of affordable housing in Kent and Ottawa counties, during the past year the GRHC awarded a total of 123 Project-Based Vouchers (PBVs) to a number of organizations in support of their development efforts:

- 6 PBVs were awarded to PK Companies, a developer working with the Dominican Sisters of Grand Rapids to build Academy Manor, a condominium complex that will include 108 senior units on Grand Rapids' east side.
- 4 PBVs were awarded to PK Companies and Third Coast Development for Belknap Place Apartments, a 50-unit development in northeast Grand Rapids.
- 11 PBVs were awarded to nonprofit developer Dwelling Place in support of First Hope at 10th Apartments, a 46-unit development that will serve very low-income families
- 11 PBVs were awarded to Genesis Non-Profit Housing Corporation for Kingsbury Place Apartments, a 44-unit development that serves residents who have mental and physical disabilities.
- 2 PBVs were awarded to Well House Rising, a southeast Grand Rapids affordable housing project being developed by Well House, a not-for-profit corporation that develops and rehabs units to provide permanent, shared, low-cost housing for families experiencing homelessness.
- 20 PBVs were awarded to co-developers WODA/Cooper Development and Cherry Health in support of Shea Ravines Apartments Phase I, a 56-unit
 affordable housing development to be built in Wyoming, Michigan, just southwest of Grand Rapids.
- 13 PBVs were awarded to Genesis Non-Profit Housing Corporation in support of Leonard Avenue Apartments in northwest Grand Rapids; this is a planned 55-unit development that will serve ages 55 and older, with a preference for Native Americans.
- 8 PBVs were awarded to nonprofit developer Samaritas in support of Samaritas Affordable Living of Spring Lake in Ottawa County. The project will include a total of 53 units and will serve families and seniors.
- 12 PBVs were awarded to LINC Up and MoTown Square Development in support of MoTown Square Affordable Assisted Living, a 54-unit southeast Grand Rapids development that will serve seniors.
- 7 PBVs were awarded to Dwelling Place in support of Harvest Hill Apartments, a 46-unit development located in Rockford, Michigan.
- 16 PBVs were awarded to nonprofit developer ICCF Community Homes in support of a planned 45-unit affordable housing development at 1309 Madison Avenue SE in Grand Rapids.
- 13 PBVs were awarded to Dwelling Place in support of the Kollen Park Housing Initiative that will bring a total of 75 affordable units to Holland, Michigan.

The recent PBV awards support the following specific Community Planning goals in our 2020-2024 Five-Year Plan:

- · Goal: Expand the role of the GRHC in community planning, particularly planning related to affordable housing opportunities.
 - Objective: Continue to seek and develop new avenues for providing affordable housing opportunities to our community's growing senior population, in particular programs and services that enhance senior citizens' ability to live independently and maintain quality of life.
- Goal: Address a community need cited in the Kent County, City of Grand Rapids and City of Wyoming Regional Consolidated Housing and Community Development Plan by making affordable housing opportunities more available to low-income and very low-income families.

B.2 Capital Grant Programs

(cont.)

During 2022 the GRHC was designated as a MTW agency and modified its CFP budgets and activities to reflect the MTW BLI of 1492. GRHC will continue to implement funding flexibilities for CFP funds as permitted by the MTW program. Activities planned for the year ahead are outlined in the MTW supplement included as Attachment E.

B.3 Progress Report.

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

The Grand Rapids Housing Commission continues to make significant progress toward accomplishing its stated mission of providing housing assistance and affordable housing opportunities to lower income families, people with disabilities and senior citizens in a manner that is fiscally sound and in ways that support families, neighborhoods and economic self-sufficiency.

Some of the most significant accomplishments of the past year follow; these support Five-Year Plan community planning, maintenance, equal opportunity and resident services goals.

- Opened the GRHC's Housing Choice Voucher (HCV) Program to 5,000 new households.
- Expanded service to residents of Ottawa County, Michigan, including supporting affordable housing development through the award of PBVs and extending a preference to county residents in conjunction with our 2023 HCV open enrollment period.
- Utilized Moving to Work (MTW) Program flexibilities to establish a Landlord Incentive Program that encourages greater access to housing for Housing Choice Voucher program participants.
- Utilized MTW flexibilities to establish a Housing Barrier Fund that helps households struggling to pay application fees, security deposits and prior utility charges and also supports the GRHC Landlord Incentive Program.
- Offered several Landlord Forum events to update landlord partners regarding our HCV Program and to encourage new landlords to participate in the program; developed a new "introduction to the HCV Program" video for landlord partners.
- Supported housing access in our service area by awarding 123 Project-Based Vouchers in support of partner organizations' affordable housing development
- Raised funding from community partners and established a new "Aim to Save" resident asset building program as the research focus of our agency's MTW activities. Enrolled 40 adult program participants and their children ages 13-18.
- Offered orientation meetings to encourage resident participation in the GRHC Housing Choice Voucher Homeownership Program and celebrated two home purchases during 2023.
- Developed a new video introduction to the GRHC Family Self-Sufficiency (FSS) Program and offered regular orientation meetings to encourage GRHC clients to participate in the FSS Program. Served more than 200 households during 2023.
- Administered 42 Emergency Housing Vouchers in support of families experiencing homelessness, at risk of housing instability or fleeing domestic violence.
- Administered 10 vouchers through the GRHC's Foster Youth to Independence (FYI) program, which provides a rental subsidy and optional supportive services to youth who are aging out of the foster care system.
- Continued the planning process for a total redevelopment of Adams Park Apartments; Adams Park serves adults with disabilities and seniors ages 62 and older
- Used a \$500,000 HOME-ARP Grant awarded by the City of Grand Rapids to begin the process of renovating the Hope Community Rapid Re-Housing Program Service Center; Hope Community serves families experiencing homelessness.
- Completed \$749,000 in capital improvements at 15 LIPH homeownership units slated for disposition through the Section 18 Scattered Sites Program or similar program.
- Earned the U.S. Green Building Council of West Michigan's 2023 Certified Green Building Award for Multifamily in recognition of the energy-efficient design and construction used in Antoine Court Apartments, a 50-unit development that serves Veterans, ages 55 and older with a disability, seniors ages 62 and older, and people experiencing chronic homelessness.
- Worked with partner organizations to provide GRHC residents with a wide range of supportive services, including health information and screening, community resource fairs, educational presentations, social opportunities, and food and transportation resources.
- Promoted literacy by partnering with the Grand Rapids Public Library to offer summer Mobile Library services at Campau Commons Apartments and Creston Plaza Apartments.
- Hosted a communitywide "Health & Unity in the Community" resource fair event at Campau Park in Grand Rapids.
- Continued a partnership with Meals On Wheels Western Michigan to host on-site Dining Centers at four GRHC developments that serve seniors.
- Continued a partnership with the USDA "Meet Up & Eat Up" children's summer meal program administered locally through Grand Rapids Public Schools.
- Expanded contracted security services at GRHC-owned developments to offer on-site security at Adams Park Apartments and roving security guards at all
 other housing sites.

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. Anticipated capital expenditures for the fiscal year that begins 7/1/2023 are included in the Capital Fund Program Five-Year Action Plan approved on 2/27/23 (available in the HUD Energy and Performance Information Center (EPIC) Secure System).
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N I Fiscal Year ended 6/30/23 (b) If yes, please describe This section will be completed when the FY 2024 audit report is available.
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) provide comments to the PHA Plan? Y N D A Resident Advisory Board meeting will be held in early March, 2024. Meeting minutes and any comments on the Plan will be provided as Attachment I.
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 statement to the PHA Plan. Included as Attachment J.
C.3	Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan Form 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. Included as Attachment K.
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 PHA Plan? Y N Section will be amended if elements are challenged.
C.4 (cont.)	If yes, include Challenged Elements.
D.	Affirmatively Furthering Fair Housing (AFFH).

) .1	Affirmatively Furthering Fair Housing. Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH)
	consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.
	The GRHC is not required to submit the Assessment of Fair Housing (AFH) for this PHA Plan year.
	Fair Housing Goal:
	Describe fair housing strategies and actions to achieve the goal
	Fair Housing Goal:
	Describe fair housing strategies and actions to achieve the goal
	Fair Housing Goal:
	Describe fair housing strategies and actions to achieve the goal

ATTACHMENT A

GRAND RAPIDS HOUSING COMMISSION LOW-INCOME PUBLIC HOUSING DECONCENTRATION POLICY

In accordance with 24 CFR, Part 903, Subpart A, the Grand Rapids Housing Commission has **no** general occupancy (family) public housing developments covered by the deconcentration rule.

		Developments Not Subject to Deconcentration
Development	# LIPH Units	and Income Mixing Requirements
Adams Park	188	Houses only elderly persons, or persons with disabilities, or
		both - 24 CFR, 903.2(b)(2)(ii)
Scattered Sites	15	Housing development with fewer than 100 public housing
		units – 24 CFR, 903.2(b)(2)(i)
		Only general occupancy, family public housing
		development operated by PHA – 24 CFR, 903.2(b)(2)(iii)

GRAND RAPIDS HOUSING COMMISSION HOUSING CHOICE VOUCHER DECONCENTRATION POLICY

Purpose

The purpose of the Grand Rapids Housing Commission's Deconcentration Policy is to establish a framework for staff to follow in order to ensure compliance with the requirements to expand housing opportunities as detailed in 24 CFR 982.54, 24 CFR 982.301, and the Housing Commission's Housing Choice Voucher Administrative Plan.

Overview

Public Housing Authorities (PHAs) are responsible for ensuring that very-low income households have access to all types and ranges of affordable housing in the PHA's jurisdiction, particularly housing outside areas of poverty or minority concentration. A critical element in fulfilling this responsibility is for the PHA to enlist a sufficient number of landlords, representing all types and ranges of affordable housing in the PHA's jurisdiction, to participate in the Housing Choice Voucher program and provide information to program participants about this initiative.

Implementation – Landlords

The Grand Housing Commission (GRHC) will conduct regular landlord outreach events to encourage property owners outside of areas of poverty and/or minority concentration to lease units to Housing Choice Voucher (HCV) participants. Educational information will be provided to familiarize owners with the program and how they benefit from participation. These outreach strategies will include:

- Distributing printed materials about the program to property owners and managers,
- Contacting property owners and managers by phone or in person,
- Holding owner recruitment/information meetings at least once a year,
- Participating in community-based organizations comprised of private property and apartment owners and managers, and
- Developing working relationships with property owners and apartment managers.

Implementation – Participants

The GRHC will affirmatively inform participants of our jurisdiction coverage area at all orientations and/or interviews. HCV participants will not be steered towards specific landlords or areas. Participants will receive information regarding the entire jurisdiction coverage area of the GRHC, be advised of the HUD deconcentration initiatives, provided information which reflects areas of deconcentration, and encouraged to make informed housing decisions.

ATTACHMENT B

Excerpt from GRHC HCV Administrative Plan, Chapter 3: ELIGIBILITY

PART II: BASIC ELIGIBILITY CRITERIA

3-II.A. INCOME ELIGIBILITY AND TARGETING

Income Limits

HUD establishes income limits for all areas of the country and publishes them annually in the *Federal Register*. They are based upon estimates of median family income with adjustments for family size. The income limits are used to determine eligibility for the program and for income targeting purposes as discussed in this section.

Definitions of the Income Limits [24 CFR 5.603(b)]

Low-income family. A family whose annual income does not exceed 80 percent of the median income for the area, adjusted for family size.

Very low-income family. A family whose annual income does not exceed 50 percent of the median income for the area, adjusted for family size.

Extremely low-income family. A family whose annual income does not exceed the federal poverty level or 30 percent of the median income for the area, whichever number is higher.

Area median income is determined by HUD, with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than 30, 50, or 80 percent of the median income for an area if HUD finds that such variations are necessary because of unusually high or low family incomes.

Using Income Limits for Eligibility [24 CFR 982.201]

Income limits are used for eligibility only at admission. Income eligibility is determined by comparing the annual income of an applicant to the applicable income limit for their family size. In order to be income eligible, an applicant family must be one of the following:

- A very low-income family
- A *low-income* family that has been "continuously assisted" under the 1937 Housing Act. A
 family is considered to be continuously assisted if the family is already receiving assistance
 under any 1937 Housing Act program at the time the family is admitted to the HCV program
 [24 CFR 982.4]
- A low-income family that qualifies for voucher assistance as a non-purchasing household living in HOPE 1 (public housing homeownership), HOPE 2 (multifamily housing homeownership) developments, or other HUD-assisted multifamily homeownership programs covered by 24 CFR 248.173
- A low-income or moderate-income family that is displaced as a result of the prepayment of a mortgage or voluntary termination of a mortgage insurance contract on eligible low-income housing as defined in 24 CFR 248.101

The GRHC has not established any additional categories of eligible low-income families.

Using Income Limits for Targeting [24 CFR 982.201]

At least 75 percent of the families admitted to the GRHC's program during a its fiscal year must be extremely low-income families. HUD may approve exceptions to this requirement if the

GRHC demonstrates that it has made all required efforts, but has been unable to attract an adequate number of qualified extremely low-income families.

Families continuously assisted under the 1937 Housing Act and families living in eligible low-income housing that are displaced as a result of prepayment of a mortgage or voluntary termination of a mortgage insurance contract are not counted for income targeting purposes.

GRHC MTW Flexibility

The GRHC will ensure that at least 75 percent of households admitted during each fiscal year in the public housing, Housing Choice Voucher (HCV), and local, non-traditional programs—will be very low-income (50%).

3-II.B. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5, SUBPART El

Housing assistance is available only to individuals who are U.S. citizens, U.S. nationals (herein referred to as citizens and nationals), or noncitizens that have eligible immigration status. At least one family member must be a citizen, national, or noncitizen with eligible immigration status in order for the family to qualify for any level of assistance.

All applicant families must be notified of the requirement to submit evidence of their citizenship status when they apply. Where feasible, and in accordance with the PHA's Limited English Proficiency Plan, the notice must be in a language that is understood by the individual if the individual is not proficient in English.

Declaration [24 CFR 5.508]

HUD requires each family member to declare whether the individual is a citizen, a national, or an eligible noncitizen, except those members who elect not to contend that they have eligible immigration status. Those who elect not to contend their status are considered to be ineligible noncitizens. For citizens, nationals and eligible noncitizens the declaration must be signed personally by the head, spouse, cohead, and any other family member 18 or older, and by a parent or guardian for minors. The family must identify in writing any family members who elect not to contend their immigration status (see Ineligible Noncitizens below). No declaration is required for live-in aides, foster children, or foster adults.

U.S. Citizens and Nationals

In general, citizens and nationals are required to submit only a signed declaration as verification of their status, unless the GRHC receives information indicating that an individual's declaration may not be accurate.

Eligible Noncitizens

In addition to providing a signed declaration, those declaring eligible noncitizen status must sign a verification consent form and cooperate with GRHC efforts to verify their immigration status as described in Chapter 7. The documentation required for establishing eligible noncitizen status varies depending upon factors such as the date the person entered the U.S., the conditions under

which eligible immigration status has been granted, the person's age, and the date on which the family began receiving HUD-funded assistance.

Lawful residents of the Marshall Islands, the Federated States of Micronesia, and Palau, together known as the Freely Associated States, or FAS, are eligible for housing assistance under section 141 of the Compacts of Free Association between the U.S. Government and the Governments of the FAS [Public Law 106-504].

Ineligible Noncitizens

Those noncitizens who do not wish to contend their immigration status are required to have their names listed on a noncontending family members listing, signed by the head, spouse, or cohead (regardless of citizenship status), indicating their ineligible immigration status. The GRHC is not required to verify a family member's ineligible status and is not required to report an individual's unlawful presence in the U.S. to the United States Citizenship and Immigration Services (USCIS).

Providing housing assistance to noncitizen students is prohibited [24 CFR 5.522]. This prohibition extends to the noncitizen spouse of a noncitizen student as well as to minor children who accompany or follow to join the noncitizen student. Such prohibition does not extend to the citizen spouse of a noncitizen student or to the children of the citizen spouse and noncitizen student. Such a family is eligible for prorated assistance as a mixed family.

Mixed Families

A family is eligible for assistance as long as at least one member is a citizen, national, or eligible noncitizen. Families that include eligible and ineligible individuals are considered *mixed families*. Such families will be given notice that their assistance will be prorated, and that they may request a hearing if they contest this determination. See Chapter 6 for a discussion of how rents are prorated, and Chapter 16 for a discussion of informal hearing procedures.

Ineligible Families [24 CFR 5.514(d), (e), and (f)]

The GRHC will not provide assistance to a family before the verification of at least one family member [24 CFR 5.512(b)]. Verification of eligibility for this purpose occurs when the individual or family members have submitted documentation to the GRHC in accordance with program requirements [24 CFR 5.512(a)].

When GRHC determines that an applicant family does not include any citizens, nationals, or eligible noncitizens, following the verification process, the family will be sent a written notice within 15 calendar days of the determination.

The notice will explain the reasons for the denial of assistance, that the family may be eligible for proration of assistance, and will advise the family of its right to request an appeal to the United States Citizenship and Immigration Services (USCIS), or to request an informal hearing with the GRHC. The informal hearing with the GRHC may be requested in lieu of the USCIS appeal, or at the conclusion of the USCIS appeal process. The notice must also inform the applicant family that assistance may not be delayed until the conclusion of the USCIS appeal process, but that it may be delayed pending the completion of the informal hearing process (Chapter 16).

Timeframe for Determination of Citizenship Status [24 CFR 5.508(g)]

For new occupants joining the assisted family, the GRHC will verify status at the first interim or regular reexamination following the person's occupancy, whichever comes first.

If an individual qualifies for a time extension for the submission of required documents, the GRHC will grant such an extension for no more than 30 calendar days [24 CFR 5.508(h)].

Each family member is required to submit evidence of eligible status only one time during continuous occupancy.

3-II.C. SOCIAL SECURITY NUMBERS [24 CFR 5.216 AND 5.218, NOTICE PIH 2018-24]

The applicant and all members of the applicant's household must disclose the complete and accurate social security number (SSN) assigned to each household member, and the documentation necessary to verify each SSN. If a child under age 6 has been added to an applicant family within 6 months prior to voucher issuance, an otherwise eligible family may be admitted to the program and must disclose and document the child's SSN within 90 calendar days of the effective date of the initial HAP contract. A detailed discussion of acceptable documentation is provided in Chapter 7.

Note: These requirements do not apply to noncitizens who do not contend eligible immigration status.

In addition, each participant who has not previously disclosed an SSN, has previously disclosed an SSN that HUD or the SSA determined was invalid, or has been issued a new SSN must submit their complete and accurate SSN and the documentation required to verify the SSN at the time of the next interim or annual reexamination or recertification. Participants age 62 or older as of January 31, 2010, whose determination of eligibility was begun before January 31, 2010, are exempt from this requirement and remain exempt even if they move to a new assisted unit.

The GRHC will deny assistance to an applicant family if they do not meet the SSN disclosure and documentation requirements contained in 24 CFR 5.216.

3-II.D. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 5.230; HCV GB, P. 5-13]

HUD requires each adult family member, and the head of household, spouse, or cohead, regardless of age, to sign form HUD-9886, Authorization for the Release of Information/Privacy Act Notice, the form HUD-52675 Debts Owed to Public Housing Agencies and Terminations, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. Chapter 7 provides detailed information concerning the consent forms and verification requirements.

The GRHC will deny admission to the program if any member of the applicant family fails to sign and submit the consent forms for obtaining information in accordance with 24 CFR 5, Subparts B and F [24 CFR 982.552(b)(3)].

3-II.E. STUDENTS ENROLLED IN INSTITUTIONS OF HIGHER EDUCATION [24 CFR 5.612, FR NOTICE 4/10/06, FR NOTICE 9/21/16]

Section 327 of Public Law 109-115 and the implementing regulation at 24 CFR 5.612 established new restrictions on the eligibility of certain students (both part- and full-time) who are enrolled in institutions of higher education.

If a student enrolled at an institution of higher education:

- Is under the age of 24,
- Is not a veteran, is not married,
- Does not have a dependent child, and
- Is not a person with disabilities receiving HCV assistance as of November 30, 2005,

the student's eligibility must be examined along with the income eligibility of the student's parents. In these cases, both the student and the student's parents must be income eligible for the student to receive HCV assistance. If, however, a student in these circumstances is determined independent from his/her parents in accordance with GRHC policy, the income of the student's parents will not be considered in determining the student's eligibility.

The new law does not apply to students who reside with parents who are applying to receive HCV assistance. It is limited to students who are seeking assistance on their own, separately from their parents.

Definitions

In determining whether and how the new eligibility restrictions apply to a student, the GRHC will rely on the following definitions [FR Notice 4/10/06, FR Notice 9/21/16].

Dependent Child

In the context of the student eligibility restrictions, *dependent child* means a dependent child of a student enrolled in an institution of higher education. The dependent child must also meet the definition of *dependent* in 24 CFR 5.603, which states that the dependent must be a member of the assisted family, other than the head of household or spouse, who is under 18 years of age, or is a person with a disability, or is a full-time student. Foster children and foster adults are not considered dependents.

Independent Student

The GRHC will consider a student "independent" from his or her parents and the parents' income will not be considered when determining the student's eligibility if the following four criteria are all met:

- The individual is of legal contract age under state law.
- The individual has established a household separate from his/her parents for at least one year prior to application for occupancy or the individual meets the U.S. Department of Education's definition of independent student.
- To be considered an *independent student* according to the Department of Education, a student must meet one or more of the following criteria:

- The individual is at least 24 years old by December 31 of the award year for which aid is sought
- The individual is an orphan, in foster care, or a ward of the court, or was an orphan, in foster care, or ward of the court at any time when the individual was 13 years of age or older
- o The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual's state of legal residence
- o The individual is a veteran of the U.S. Armed Forces or is currently serving on active duty in the Armed Forces for other than training purposes
- The individual is a graduate or professional student
- The individual is married
- The individual has one or more legal dependents other than a spouse (for example, dependent children or an elderly dependent parent) The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:
 - A local educational agency homeless liaison
 - The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director
 - A financial aid administrator
- The individual is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances
- The individual was not claimed as a dependent by his/her parents pursuant to IRS regulations, as demonstrated on the parents' most recent tax forms.
- The individual provides a certification of the amount of financial assistance that will be provided by his/her parents. This certification must be signed by the individual providing the support and must be submitted even if no assistance is being provided.

If the GRHC determines that an individual meets the definition of a *vulnerable youth* such a determination is all that is necessary to determine that the person is an *independent student* for the purposes of using only the student's income for determining eligibility for assistance. The GRHC will verify that a student meets the above criteria in accordance with the policies in Section 7-II.E.

Institution of Higher Education

The GRHC will use the statutory definition under section 102 of the Higher Education Act of 1965 to determine whether a student is attending an *institution of higher education* (see Exhibit 3-2).

Parents

For purposes of student eligibility restrictions, the definition of *parents* includes biological or adoptive parents, stepparents (as long as they are currently married to the biological or adoptive parent), and guardians (e.g., grandparents, aunt/uncle, godparents, etc).

Person with Disabilities

The GRHC will use the statutory definition under section 3(b)(3)(E) of the 1937 Act to determine whether a student is a *person with disabilities* (see Exhibit 3-1).

Veteran

A *veteran* is a person who served in the active military, naval, or air service and who was discharged or released from such service under conditions other than dishonorable.

Vulnerable Youth

A vulnerable youth is an individual who meets the U.S. Department of Education's definition of independent student in paragraphs (b), (c), or (h), as adopted in Section II of FR Notice 9/21/16:

- The individual is an orphan, in foster care, or a ward of the court, or was an orphan, in foster care, or ward of the court at any time when the individual was 13 years of age or older
- The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual's state of legal residence
- The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:
 - A local educational agency homeless liaison
 - O The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director
 - o A financial aid administrator

Determining Student Eligibility

If a student is applying for assistance on his/her own, apart from his/her parents, the GRHC will determine whether the student is subject to the eligibility restrictions contained in 24 CFR 5.612. If the student is subject to those restrictions, the GRHC will ensure that:

- (1) The student is individually eligible for the program,
- (2) Either the student is independent from his/her parents or the student's parents are income eligible for the program, and
- (3) The "family" with which the student is applying is collectively eligible for the program.

If the GRHC determines that the student, the student's parents (if applicable), or the student's "family" is not eligible, the GRHC will send a notice of denial in accordance with the policies in Section 3-III.F, and the applicant family will have the right to request an informal review in accordance with the policies in Section 16-III.B.

Determining Parental Income Eligibility

For any student who is subject to the 5.612 restrictions and who does not satisfy the definition of *independent student* in this section, the GRHC will determine the income eligibility of the student's parents as follows:

- If the student's parents are married and living together, the GRHC will obtain a joint income declaration and certification of joint income from the parents.
- If the student's parent is widowed or single, the GRHC will obtain an income declaration and certification of income from that parent.
- If the student's parents are divorced or separated, the GRHC will obtain an income declaration and certification of income from each parent.
- If the student has been living with one of his/her parents and has not had contact with or does not know where to contact his/her other parent, the GRHC will require the student to submit a certification under penalty of perjury describing the circumstances and stating that the student does not receive financial assistance from the other parent. The GRHC will then obtain an income declaration and certification of income from the parent with whom the student has been living or had contact.

In determining the income eligibility of the student's parents, the GRHC will use the income limits for the jurisdiction in which the parents live.

3-II.F. EIV SYSTEM SEARCHES [NOTICE PIH 2018-18; EIV FAQS; EIV SYSTEM TRAINING 9/30/20]

Existing Tenant Search

Prior to admission to the program, the GRHC will search for all household members using the EIV Existing Tenant Search module. The GRHC will review the reports for any SSA matches involving another PHA or a multifamily entity and follow up on any issues identified. The GRHC will provide the family with a copy of the Existing Tenant Search results if requested. At no time may any family member receive duplicative assistance.

If the tenant is a new admission to the GRHC, and a match is identified at a multifamily property, the GRHC will contact the PHA or owner identified in the report to confirm that the family has moved out of the unit and obtain documentation of current tenancy status, including a form HUD-50058 or 50059, as applicable, showing an end of participation. The GRHC will only approve assistance contingent upon the move-out from the currently occupied assisted unit.

Debts Owed to PHAs and Terminations

All adult household members must sign the form HUD-52675 Debts Owed to Public Housing and Terminations. The GRHC will search the Debts Owed to PHAs and Terminations module as part of the eligibility determination for new households and as part of the screening process for any household members added after the household is admitted to the program. If any information on debts or terminations is returned by the search, the GRHC will determine if this information warrants a denial in accordance with the policies in Part III of this chapter.

If a current or former tenant disputes the information in the module, the tenant should contact the PHA directly in writing to dispute the information and provide any documentation that supports the dispute. If the PHA determines that the disputed information is incorrect, the PHA will

update or delete the record from EIV. Former tenants may dispute debt and termination information for a period of up to three years from the end of participation date in the program.

Income and IVT Reports

For each new admission, the GRHC is required to review the EIV Income and IVT Reports to confirm and validate family reported income within 120 days of the IMS/PIC submission date of the new admission. The GRHC will print and maintain copies of the EIV Income and IVT reports in the tenant file and resolve any discrepancies with the family within 60 calendar days of the EIV Income or IVT report dates.

ATTACHMENT C

Excerpt from GRHC HCV Administrative Plan, Chapter 7: VERIFICATION [24 CFR 982.516, 24 CFR 982.551, 24 CFR 5.230, Notice PIH 2018-18]

unable to provide the document(s), the GRHC will help the applicant request a benefit verification letter from SSA's Web site at www.ssa.gov or ask the family to request one by calling SSA at

1-800-772-1213. Once the applicant has received the benefit verification letter they will be required to provide it to the GRHC.

To verify the SS/SSI benefits of participants, the GRHC will obtain information about social security/SSI benefits through the HUD EIV System, and confirm with the participant(s) that the current listed benefit amount is correct. If the participant disputes the EIV-reported benefit amount, or if benefit information is not available in HUD systems, the GRHC will request a current SSA benefit verification letter from each family member that receives social security benefits. If the family is unable to provide the document(s) the GRHC will help the participant request a benefit verification letter from SSA's Web site at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the participant has received the benefit verification letter they will be required to provide it to the GRHC.

7-III.D. ALIMONY OR CHILD SUPPORT

The methods the GRHC will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.

If the family declares that it *receives regular payments*, verification will be obtained in the following order of priority:

- Copies of the receipts and/or payment stubs for the previous year prior to GRHC request
- Third-party verification form from the state or local child support enforcement agency
- Third-party verification form from the person paying the support
- Family's self-certification of amount received

If the family declares that it *receives irregular or no payments*, in addition to the verification process listed above, the family must provide evidence that it has taken all reasonable efforts to collect amounts due. This may include:

- A statement from any agency responsible for enforcing payment that shows the family has requested enforcement and is cooperating with all enforcement efforts
- If the family has made independent efforts at collection, a written statement from the attorney or other collection entity that has assisted the family in these efforts

Note: Families are not required to undertake independent enforcement action.

7-III.E. ASSETS AND INCOME FROM ASSETS

Assets Disposed of for Less than Fair Market Value

The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years. The GRHC needs to verify only those certifications that warrant documentation [HCV GB, p. 5-28]. The GRHC will verify the value of assets disposed of only if:

ATTACHMENT D

Excerpt from GRHC HCV Administrative Plan Chapter 17: PROJECT-BASED VOUCHERS, 17-II.B

PART II: PBV OWNER PROPOSALS

17-II.A. OVERVIEW

With certain exceptions, the GRHC will describe the procedures for owner submission of PBV proposals and for GRHC selection of PBV proposals [24 CFR 983.51]. Before selecting a PBV proposal, the GRHC will determine that the PBV proposal complies with HUD program regulations and requirements, including a determination that the property is eligible housing [24 CFR 983.53 and 983.54], complies with the cap on the number of PBV units per project [24 CFR 983.56], and meets the site selection standards [24 CFR 983.57]. The GRHC will not commit PBVs until or unless it has followed the proposal selection requirements defined in 24 CFR 983.51 [Notice PIH 2011-54].

17-II.B. OWNER PROPOSAL SELECTION PROCEDURES [24 CFR 983.51(b)]

The GRHC will select PBV proposals in accordance with the selection procedures in the GRHC administrative plan. The GRHC will select PBV proposals by either of the following two methods.

- <u>GRHC request for PBV Proposals</u>. The GRHC may solicit proposals by using a request for proposals to select proposals on a competitive basis in response to the GRHC request. The GRHC may not limit proposals to a single site or impose restrictions that explicitly or practically preclude owner submission of proposals for PBV housing on different sites.
- The GRHC may select proposal that were previously selected based on a competition. This may include selection of a proposal for housing assisted under a federal, state, or local government housing assistance program that was subject to a competition in accordance with the requirements of the applicable program, community development program, or supportive services program that requires competitive selection of proposals (e.g., HOME, and units for which competitively awarded LIHTCs have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance. The GRHC will not conduct another competition.

Units Selected Non-Competitively [FR Notice 1/18/17; Notice PIH 2017-21; 24 CFR 983.51(b)]

For certain public housing projects where the GRHC has an ownership interest or control, the GRHC may attach PBV assistance non-competitively without following one of the two processes above.

This exception applies when the GRHC is engaged in an initiative to improve, develop, or replace a public housing property or site. The public housing units may either currently be in the public housing inventory or may have been removed from the public housing inventory within five years of the date on which the PHA entered into the AHAP or HAP.

If the GRHC is planning rehabilitation or new construction on the project, a minimum threshold of \$25,000 per unit in hard costs must be expended.

If the GRHC plans to replace public housing by attaching PBV assistance to existing housing in which the GRHC has an ownership interest or control, then the \$25,000 per unit minimum threshold does not apply as long as the existing housing substantially complies with HQS.

The GRHC must include in the administrative plan what work it plans to do on the property or site and how many PBV units will be added to the site. The GRHC will attach PBVs to projects owned by the GRHC as described above.

Solicitation and Selection of PBV Proposals [24 CFR 983.51(c)]

The GRHC procedures for selecting PBV proposals must be designed and actually operated to provide broad public notice of the opportunity to offer PBV proposals for consideration by the GRHC. The public notice procedures may include publication of the public notice in a local newspaper of general circulation and other means designed and actually operated to provide broad public notice. The public notice of the GRHC request for PBV proposals must specify the submission deadline. Detailed application and selection information must be provided at the request of interested parties.

PBV Project Definition

All proposals must meet the definition of project as stipulated by HUD in 24 CFR 983.3(b):

- A project is a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land. Contiguous in this definition includes "adjacent to", as well as touching along a boundary or a point.
 - o Per 24 CFR 983.202, the only exception are single family scattered site projects.

The GRHC has determined that in efforts to meet critical housing needs, to additionally adopt the United States Environmental Protection Agency's position on public right-of-way in terms of contiguous property.

• Public right-of-way (e.g., railroad, highway, street, alley, easement) do not prevent property from being considered contagious.

GRHC Request for Proposals for Rehabilitated and Newly Constructed Units

The GRHC will advertise its request for proposals (RFP) for rehabilitated and newly constructed housing in local newspapers and trade journals with general circulation, to ensure broad public notice. GRHC will also provide public notice on its public website: grhousing.org and social media accounts.

The advertisement will state the number of vouchers available to be project-based, the type of units that will be considered, the submission deadline, and will note how to obtain the full RFP with information on the application and selection process. Advertisements will also contain a statement that participation in the PBV program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements.

In addition, the GRHC will post the RFP and proposal submission and rating and ranking procedures on its website.

The GRHC will publish its advertisement in the newspapers and trade journals for at least one day per week for three consecutive weeks. The advertisement will specify the number of units the GRHC estimates that it will be able to assist under the funding the GRHC is making

available. Proposals will be due in the GRHC office by close of business 30 calendar days from the date of the last publication.

In order for the proposal to be considered, the owner must submit the proposal to the GRHC by the published deadline date, and the proposal must respond to all requirements as outlined in the RFP. Incomplete proposals will not be reviewed.

The GRHC will rate and rank proposals for rehabilitated and newly constructed housing using the following criteria:

- Owner experience and capability to build or rehabilitate housing as identified in the RFP;
- Extent to which the project furthers the GRHC goal of deconcentrating poverty and expanding housing and economic opportunities;
- If applicable, the extent to which services for special populations are provided on site or in the immediate area for occupants of the property; and
- In order to promote partially assisted projects, projects where less than 25 percent of the units will be assisted will be rated higher than projects where 25 percent or more of the units will be assisted. In the case of projects for occupancy by the elderly, persons with disabilities or families needing other services, the PHA will rate partially assisted projects on the percentage of units assisted. Projects with the lowest percentage of assisted units will receive the highest score.

GRHC Requests for Proposals for Existing Housing Units

The GRHC will advertise its request for proposals (RFP) for existing housing in in local newspapers and trade journals with general circulation, to ensure broad public notice. GRHC will also provide public notice on its public website: grhousing.org and social media accounts.

The advertisement will state the number of vouchers available to be project-based, the type of units that will be considered, the submission deadline, and will note how to obtain the full RFP with information on the application and selection process. Advertisements will also contain a statement that participation in the GRHC program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements.

The GRHC will publish its advertisement in the newspapers and trade journals for at least one day per week for three consecutive weeks. The advertisement will specify the number of units the GRHC estimates that it will be able to assist under the funding the GRHC is making available. Owner proposals will evaluated using the following criteria:

- Experience as an owner in the tenant-based voucher program and owner compliance with the owner's obligations under the tenant-based program;
- Extent to which the project furthers the GRHC goal of deconcentrating poverty and expanding housing and economic opportunities;
- If applicable, extent to which services for special populations are provided on site or in the immediate area for occupants of the property; and

Extent to which units are occupied by families that are eligible to participate in the GRHC program.

<u>GRHC Selection of Proposals Subject to a Previous Competition under a Federal, State, or Local Housing Assistance Program</u>

The GRHC will accept proposals for PBV assistance from owners that were competitively selected under another federal, state or local housing assistance program, including projects that were competitively awarded Low-Income Housing Tax Credits on an ongoing basis.

The advertisement will state the number of vouchers available to be project-based, the type of units that will be considered, the submission deadline, and will note how to obtain the full RFP with information on the application and selection process. Advertisements will also contain a statement that participation in the PBV program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements.

In addition to, or in place of advertising, the GRHC may also directly contact specific owners that have already been selected for Federal, state, or local housing assistance based on a previously held competition, to inform them of available PBV assistance.

The GRHC will evaluate each proposal on its merits using the following factors:

- Extent to which the project furthers the GRHC goal of deconcentrating poverty and expanding housing and economic opportunities; and
- Extent to which the proposal complements other local activities such as the redevelopment of a public housing site under the HOPE VI program, the HOME program, CDBG activities, other development activities in a HUD-designated Enterprise Zone, Economic Community, Choice Neighborhood, or Renewal Community.

GRHC-Owned Units [24 CFR 983.51(e), 983.59, FR Notice 1/18/17, and Notice PIH 2017-21]

GRHC MTW Flexibility

The GRHC will utilize the elimination of PBV Selection Process for PHA-owned Project without improvement, development, or replacement in order to reduce costs associated with the RFP process.

Upon HUD approval of MTW flexibilities these requirements are no longer applicable.

A GRHC-owned unit may be assisted under the PBV program only if the HUD field office or HUD-approved independent entity reviews the selection process and determines that the GRHC-owned units were appropriately selected based on the selection procedures specified in the GRHC administrative plan. This also applies to noncompetitive selections. If the PHA selects a proposal for housing that is owned or controlled by the GRHC, the GRHC must identify the entity that will review the GRHC proposal selection process and perform specific functions with respect to rent determinations, the term of the HAP contract, and inspections.

In the case of GRHC-owned units, the term of the HAP contract and any HAP contract renewal must be agreed upon by the GRHC and a HUD-approved independent entity. In addition, an independent entity must determine the initial rent to owner, the redetermined rent to owner, and reasonable rent. Housing quality standards inspections must also be conducted by an independent entity.

GRHC Notice of Owner Selection [24 CFR 983.51(d)]

Within 15 calendar days of the GRHC making the selection, the GRHC will notify the selected owner in writing of the owner's selection for the PBV program. The PHA will also notify in writing all owners that submitted proposals that were not selected and advise such owners of the name of the selected owners.

In addition, the GRHC will publish its notice for selection of GRHC proposals for two consecutive days in the same newspapers and trade journals the GRHC used to solicit the proposals. The announcement will include the name of the owner that was selected for the PBV program. The GRHC will also post the notice of owner selection on its electronic web site.

The GRHC will make available to any interested party its rating and ranking sheets and documents that identify the GRHC basis for selecting the proposal. These documents will be available for review by the public and other interested parties for one month after publication of the notice of owner selection. The GRHC will not make available sensitive owner information that is privileged, such as financial statements and similar information about the owner.

ATTACHMENT E

GRHC Moving to Work Supplement

(Click here to read the Moving to Work Ssupplement)

ATTACHMENT F

GRHC HCV ADMINISTRATIVE PLAN CHAPTER 20 MOVING TO WORK

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INTRODUCTION

Moving to Work (MTW) is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. MTW allows PHAs exemptions from many existing public housing and voucher rules and provides funding flexibility with how they use their federal funds.

In September of 2022, the Grand Rapids Housing Commission (GRHC) was selected to be part of the Moving to Work Expansion – Asset Building Cohort. As part of this cohort, the GRHC must test asset building initiatives that encourage the growth of savings and/or aim to build credit for assisted households.

This chapter contains information about the Asset Building Program and Waivers the GRHC has selected.

There are two (2) parts to this chapter:

<u>Part I: Asset Building Program (Aim to Save)</u>. This part includes a description of the Aim to Save Program and how the GRHC will administer the program.

Part II: MTW Activity Waivers. This part contains information about the MTW Waivers the GRHC has selected to implement (Note: Activities are only listed; policy changes will be reflected in their respective chapters).

PART I: ASSET BUILDING PROGRAM

1-I.A. Opt-Out Savings Account Option Selected:

The GRHC selected to implement Option C – PHA Designed Asset Building Option as stipulated in PIH Notice 2022-11 Section 3.

1-I.B. Aim to Save Program

The GHRC - designed asset building initiative will lead to strengthened household stability through savings, increased credit worthiness, and positive role modeling for our youth who will also be eligible to participate in the initiative. The GRHC will provide funds to HCV assisted households with the goal of increasing savings for our program participants and believe simply opening a savings account, depositing funds, and interacting with a financial institution will lead to greater financial stability when life altering events occur (paying rent vs. paying car) and opportunities to increasing credit worthiness. The GRHC will also use lessons learned from our successful FSS and homeownership programs to guide successful activities of the Asset Building program.

1-I.C. Selection Criteria

- The GRHC will select up to 40 assisted families to participate in the program.
- Program Participants will be selected from the following programs:
 - o Housing Choice Voucher (HCV) Program
 - Project Based Voucher (PBV) Program
- The GRHC will identify households that have youth between the ages of 13 and 18.
- Notification will be provided to all eligible families and an application will be provided.
 - No contract of participation will be required to participate in the Aim to Save program, however, an acknowledgement of participation will be provided for signature.
 - Households do not need to be participating in GRHC's FSS program to participate in this savings program.
 - o Participants may opt out of this activity at any time.
- The GRHC will randomize the selection of eligible families that have submitted an application.
- Each participant must agree to open a savings account with a partnering financial institution and will be offered educational opportunities around banking, saving and financial management.

1-I.D. Program Operation

- Each participating head of household will receive a monthly deposit of \$50.00.
 - The number of contributions is not tied to income and will be made whether or not there is a corresponding increase in the participant contribution.
- Youth of participating head of households, ages 13-18 are eligible to participate in the savings program (up to 3 per household) and will receive a monthly deposit of \$25.00.
- **Term:** Funds will be provided in the form of a savings account that will accrue for two (2) years or until the account reaches \$5,200.00.

- Head of household participants may deposit additional amounts that will be matched by the GRHC on an annual basis of up to \$1,000 per year for two (2) years.
- Youth participants may deposit additional amounts that will be matched by the GRHC on an annual basis of up to \$500 per year for two (2) years.
- Participants must let the funds accumulate in the account for at least one (1) year before they can access the funds unless the participant demonstrates an urgent need.

1-I.E. HUD Asset Building Opt-out Group

The GRHC has partnered with the Department of Housing and Urban Development (HUD) to add an additional 50 families to study the effects of asset building initiatives have on assisted families. These families will be selected from all the GRHC's portfolio (including special voucher programs). Although the program will adhere to various aspects of the Aim to Save program, the following indicates the departure from the Aim to Save Program:

- Families will be selected randomly from the GRHC portfolio based on criteria established by HUD.
- A control group of 25 families will be selected randomly and will not have monthly deposits submitted by the GRHC.
- The GRHC will not match additional funds deposited by families into the savings accounts.
- The GRHC will only deposit funds into the Head of Household savings account.

PART II: MTW WAIVERS

(Note: Activities are only listed; policy changes will be reflected in their respective chapters).

1.II.A. Waiver Source and Selection

HUD has pre-approved more than 70 MTW Waivers permitting a range of activities in 17 categories. Those pre-approved MTW Waivers and MTW activities are provided in Appendix I of the MTW Operations Notice (Exhibit 20.1).

The GRHC can select new waivers, remove, and/or modify waiver activities annually during its annual plan submission in the MTW Supplemental Form, or amend during its fiscal year.

1.II.B. GRHC Selected Waivers

Below are the MTW Waivers selected by the GRHC to implement (Note: this may change on an annual basis, and will be updated as such):

- 2. Payment Standards and Rent Reasonableness (See Admin Plan Chapter 17)
 - o 2.d Rent Reasonableness Third Party Requirement
- 3. Reexaminations (See Admin Plan Chapter 11)
 - o 3.a Alternative Reexamination Schedule for Households (PH)
 - o 3.b Alternative Reexamination Schedule for Households (HCV)
 - o 3.c Self-Certification of Assets (PH)
 - o 3.d Self-Certification of Assets (HCV)
- 4. Landlord Leasing Incentives (See Admin Plan Chapter 13)
 - o 4.a Vacancy Loss (HCV Tenant-Based Assistance)
 - o 4.c Other Landlord Incentives (HCV Tenant-Based Assistance)
- 5. Housing Quality Standards (See Admin Plan Chapter 8)
 - o 5.a Pre-Qualifying Unit Inspections (HCV)
 - o 5.c Third-Party Requirement (HCV)
 - o 5.d Alternative Inspection Schedule (HCV)
- 9. Project-Based Voucher Program Flexibilities (See Admin Plan Chapter 17)
 - 9.a Increase PBV Program Cap (HCV) Plan to Implement in the Submission Year
 - o 9.b Increase PBV Project Cap (HCV) Plan to Implement in the Submission Year
 - 9.c Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)
 - 9.g Increase PBV Rent to Owner (HCV) Plan to Implement in the Submission Year

ATTACHMENT G

	Adams	Campau	Hope	Hope Support	Leonard	Mt Mercy I	Mt Mercy II	Ransom	Sheldon	Scattered LIPH	Scattered RAD
Revenues:											
Management and Bookkeeping Fees	-	-	-	-	-	-	-	-	-	-	
HUD Grants	488,376	-	-	159,663	-	-	-	1,313,474	-	67,978	-
Vacancies	(20,000)	(1,200)	(4,000)	-	(6,000)	(9,800)	(3,200)	(4,000)	(1,000)	(20,000)	(1,000)
Tenant Assistance Payment	-	495,000	450,000	-	1,065,000	650,000	350,000	-	425,000) -	102,049
Administrative Fee	-	-	-	-	-	-	-	-	-	-	-
Dwelling Rental	599,712	375,000	200,000	-	650,000	466,000	188,000	562,918	259,400	55,000	78,911
Excess Utilities	2,250	150	-	-	1,900	-	-	-	-	-	2,000
Investment Income-unrestricted	-	-	-	-	-	-	-	-	-	-	-
Investment income-Residual Rec	-	-	-	-	-	-	-	850	-	-	-
Investment Income-Repl Reserve	-	-	-	-	-	-	-	850	-	-	-
Fraud Recovery Funds	-	-	-	-	-	-	-	-	-	-	-
FSS Escrow Forfeitures	-	-	-	-	-	-	-	-	-	-	-
Other Income	25,000	20,000	5,000	-	5,000	9,000	1,240	7,500	1,000	500	4,500
Laundry Receipts	9,000	-	-	-	3,000	7,000	2,000	11,150	675	-	-
Vending Income	-	-	-	-	-	850	-	-	-	-	-
Interest on General Funds	-	-	-	-	-	-	100	-	-	-	-
Total Revenues	1,104,338	888,950	651,000	159,663	1,718,900	1,123,050	538,140	1,892,742	685,075	103,478	186,460
Expenses:											
Administrative:											
Salaries	194,751	108,867	33,276	-	157,311	101,871	44,380	136,458	52,403	15,165	24,017
Compensated Absences	-	-	-	-	-	-	-	-	-	-	-
Legal Fees	300	500	1,000	-	1,000	4,000	2,000	1,800	200	200	850
Consulting (non-legal)	-	-	-	-	-	-	-	-	-	-	-
Training	4,300	3,000	1,400	-	4,000	1,000	500	4,300	2,000	150	600
Travel	4,500	3,000	1,400	-	4,000	1,000	500	4,500	2,000	150	640
HR Onboarding	215	150	70	-	200	140	60	225	100	10	30
Auditing Fees	2,500	7,500	500	-	2,000	2,000	7,500	15,000	7,500	2,000	500
Employee Benefits	74,511	42,747	9,502	-	57,730	40,459	17,890	61,838	17,740	6,067	8,546
Tuition Reimbursement											
Bank Fees	3,881	2,069	808	-	4,309	-	2,072	4,196	2,667	-	-
Office Supplies	5,000	1,500	1,000	-	2,800	8,000	3,000	3,200	900	100	400
Telephone Charges	3,000	13,000	2,500	-	5,000	9,800	4,200	8,700	2,500	150	350
Advertising	550	360	200	-	500	1,750	750	550	250	20	75

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	Adams	Campau	Hope	Hope Support	Leonard	Mt Mercy I	Mt Mercy II	Ransom	Sheldon	Scattered LIPH	Scattered RAD
Communications	1,050	500	150		700	700	300	825	250	-	110
Dues/Memberships/Subscriptions	1,800	1,200	600		1,600	1,700	750	1,800	800	60	250
Eviction/Collection Costs	21,000	4,200	10,000	-	4,000	6,500	1,500	5,000	1,000	500	1,500
IT Related	20,000	20,000	20,000		20,000	10,500	4,500	30,000	20,000	500	500
Copy Machine	3,700	2,960	360	-	3,700	2,600	1,100	3,700	3,700	-	740
Portable Admin Fee	-	-	-	-	-	-		-			-
Rent Free Unit	-	-	-	-	-	-	-	11,724	-	-	-
Postage	1,500	1,250	300	-	2,500	2,000	800	2,000	1,000	150	200
Other Sundry	1,500	1,000	500	1	1,300	1,200	1,500	1,500	800	1,500	1,500
Management Fee	121,260	94,674	-	-	64,500	67,425	21,120	90,600	30,471	6,450	14,263
Asset Management Fee	-	-	-	-	-	-	-	-	-	-	-
Bookkeeping Fee	16,920	-	-	-	-	-	-	-	-	900	-
Total Administrative	482,238	308,478	83,566	-	337,150	262,645	114,422	387,917	146,281	34,072	55,071
Tenant Services:											
Tenant Services - Salaries	68,919	27,742	1,556	108,966	76,152	57,002	24,652	72,357	22,239	778	3,947
Tenant Services- Benefits	30,012	13,236	552	50,430	29,585	21,737	9,395	29,780	10,907	276	1,777
Tenant Services-Other	3,000	1,500	4,400	-	4,400	4,680	2,720	5,400	2,500	100	300
Protective Services	60,000	38,000	38,000		38,000	26,754	11,466	38,220	38,000		
Total Tenant Services	161,931	80,478	44,508	159,396	148,137	110,173	48,233	145,757	73,646	1,154	6,024
Utilities:											
Water	56,000	45,000	15,000		43,000	40,000	17,500	13,000	15,000	10,000	14,000
Electricity	120,000	9,000	25,000		92,000	97,000	40,000	130,000	45,000	2,000	200
Gas	45,000	2,500	15,000		49,000	65,000	30,000	92,000	23,000	3,500	200
Internet	3,000	2,500	3,500		3,700	2,500	1,200	3,500	3,600	25	150
Total Utilities	224,000	59,000	58,500	-	187,700	204,500	88,700	238,500	86,600	15,525	14,550
Maintenance:											
Maintenance Labor	124,038	81,467	16,259		101,663	85,080	36,463	108,121	16,259	6,482	15,836
Maintenance Materials	20,000	14,000	5,000		22,000	9,000	5,000	36,000	5,000	6,000	4,000
Cleaning Supplies	6,500	2,500	1,000		4,000	2,000	1,000	5,000	800	200	400
Painting Supplies	4,500	2,000	3,000		3,000	2,000	1,000	4,500	1,000	500	500
Appliances	14,000	52,000	20,000		90,000	70,000	31,000	90,000	48,000	1,000	600
Other Supplies	1,000	3,000	1,000		1,500	1,000	500	5,000	500	-	100
Inspections	2,000	750	1,000		500	500	1,000	15,000	1,000	500	2,500

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	Adams	Campau	Норе	Hope Support	Leonard	Mt Mercy I	Mt Mercy II	Ransom	Sheldon	Scattered LIPH	Scattered RAD
Exterminating	43,000	3,000	1,500		40,000	28,000	12,000	35,000	2,500	1,000	1,500
Heating & Cooling Repairs	32,000	15,000	7,500		40,000	18,000	10,000	50,000	10,000	4,000	1,500
Elevator Maintenance	15,000	1,000	-		8,000	7,500	10,000	10,000	4,200	-	-
Lawn Care	6,000	12,000	6,000		4,000	15,500	6,700	4,500	4,000	-	-
Snow Plowing	5,000	13,000	4,500		8,000	10,000	3,000	7,500	4,500	-	-
Electrical Repairs	2,000	1,800	250		2,000	1,500	1,200	15,000	1,500	250	1,000
Carpet/Tile Replacement	30,000	14,000	15,000		40,000	75,000	6,000	55,000	10,000	-	5,000
Plumbing Repairs	15,000	28,800	2,000		80,000	10,000	1,500	20,000	5,000	6,000	2,000
Other Contract Costs	85,000	20,000	30,000	-	20,000	20,000	10,000	65,000	8,000	10,000	22,000
Janitorial contracts	-	-	-		-	-	-	-	-	-	-
Trash Removal	35,000	30,000	15,000		9,000	9,000	4,500	17,000	6,000	-	-
Maintenance Travel	800	500	100		800	400	500	1,000	250	100	500
Maintenance Benefits	71,514	39,722	1,679		49,635	36,182	15,506	50,302	1,679	2,626	7,506
Painting	20,000	10,000	2,500		30,000	12,000	5,000	26,000	5,000	1,000	4,500
Total Maintenance	532,352	344,539	133,288	-	554,098	412,662	161,869	619,923	135,188	39,658	69,442
General Expenses:											
Insurance	38,462	60,472	12,029		11,880	10,755	5,218	37,234	23,199	8,140	9,161
Mortgage Insurance	-	-	-		-	-	-	18,250	-	-	-
Workers Comp. Insurance	722	479	233	267	652	457	203	717	327	24	101
PILOT	38,096	31,850	14,500		46,790	26,400	10,050	-	17,640	3,950	6,651
Casualty Loss	-	-	-		-	-	-	-	-	-	-
Bad Debt-Tenants	15,000	8,000	5,000		4,000	1,500	3,600	4,500	2,000	900	750
Interest-Mortgage	-	143,686	-		55,933	88,123	25,884	146,832	63,482	-	-
Other General Expense	-	-	-		-	-	-		-	-	-
Housing Assistance	-	-	-		-	-	-	-	-	-	-
Housing Assistance: HO	-	-	-		-	-	-	-	-	-	-
Housing Assistance: NED	-	-	-		-	-	-	-	-	-	-
Housing Assistance: Enhanced	-	-	-		-	-	-		-	-	-
FSS Escrow	1,000	-	-		-	-	-	-	-	-	4,000
Depreciation	10,556	283,502	40,421		82,913	228,372	143,989	118,347	99,041	42,084	22,914
Amortization	-	-	-		-	-	-	5,561	-	-	-
Total General Expenses	103,836	527,989	72,183	267	202,168	355,607	188,944	331,441	205,689	55,098	43,577
Total Expenses	1,504,358	1,320,484	392,045	159,663	1,429,254	1,345,587	602,168	1,723,538	647,403	145,507	188,664

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	Adams	Campau	Hope	Hope Support	Leonard	Mt Mercy I	Mt Mercy II	Ransom	Sheldon	Scattered LIPH	Scattered RAD
Net Income (Loss)	(400,020)	(431,534)	258,955	0	289,646	(222,537)	(64,028)	169,204	37,672	(42,030)	(2,204)
Cash flow reconciliation:											
Add: Depreciation expense	10,556	283,502	40,421	-	82,913	228,372	143,989	123,908	99,041	42,084	22,914
Add: Paid from escrow or reserve		52,000				120,000	31,000	145,484		-	-
Add/Less: Accrued Interest payable to GRHC		143,686									
Add: Capital Fund operations	460,000										
Add: Principal pmts mortgage rec											
Add: Anticipated Adjustments		50,000	15,000								
Less: Mortgage principal payments					(47,602)	(92,882)	(27,331)	(119,719)	(29,989)		
Less: Replacement reserve deposits							-	(58,110)	-		(19,992)
Less: Voluntary reserve deposits		(90,000)	-		(25,000)	(9,996)	(3,000)		(24,000)		
Less: Capital items from operations	-	-	-		-	-	-	-	-		
Less: IT Capital items from operations	-		-		-	-	-	-	-		
Add/Less: MTW Transfer											
Net estimated cash flow	70,536	7,655	314,376	0	299,958	22,957	80,630	260,767	82,723	55	718

GRAND RAPIDS HOUSIN

GRAND RAPIDS HOUS											
	Scattered H.O.	Vouchers Admin	Vouchers HAP	Mainstream	EHV	Mod Rehab I	Mod Rehab 4	ROSS FSS	Central Office	Elim.	Totals
Revenues:											
Management and Bookkeeping Fees		-	-			-	-	-	1,525,087	(1,419,804)	105,282
HUD Grants	-	-	31,545,336	2,006,828	372,416	121,080	480,912	478,324	-		37,034,386
Vacancies	-	-	-			-	-	-	-		(70,200)
Tenant Assistance Payment	-	-	-			-	-	-	-	(3,537,049)	-
Administrative Fee	-	2,802,917	-	213,323	61,273	14,100	71,012	-	-		3,162,626
Dwelling Rental	-	-	-			-	-	-	-		3,434,941
Excess Utilities	-	-	-			-	-	-	-		6,300
Investment Income-unrestricted	-	-				-	-	-	396,538		396,538
Investment income-Residual Rec	-	-				-	-	-	-		850
Investment Income-Repl Reserve	-	-				-	-	-	-		850
Fraud Recovery Funds	-	30,000	30,000			-	-	-	-		60,000
FSS Escrow Forfeitures	-	-	75,000			-	-	-	-		75,000
Other Income	70,000	-	-			-	-	-	400,000		548,740
Laundry Receipts	-	-	-			-	-	-	-		32,825
Vending Income	-	-	-			-	-	-	-		850
Interest on General Funds	1,100	-	-			-	-	-	-		1,200
Total Revenues	71,100	2,832,917	31,650,336	2,220,151	433,689	135,180	551,924	478,324	2,321,625	(4,956,853)	44,790,188
Expenses:											
Administrative:											
Salaries	-	1,191,835	-	96,524	31,008	5,454	23,107	-	1,275,672		3,492,098
Compensated Absences	-	-	-	-	-	-	-	-	-		-
Legal Fees	-	15,000	-	500	-	50	-	-	11,000		38,400
Consulting (non-legal)	-	200,000	-	10,000	-	900	-	-	15,000		225,900
Training	-	15,000	-	1,700	-	50	250	-	10,560		48,810
Travel	-	15,000	-	1,800	-	50	300	-	11,088		49,928
HR Onboarding	-	750	-	100	-	-	15	-	528		2,593
Auditing Fees	1,000	50,000	-	1,500	50	200	1,000	-	10,000		110,750
Employee Benefits	-	528,925	-	43,038	13,769	2,324	10,018	-	431,046		1,366,151
Tuition Reimbursement									-		-
Bank Fees	-	-	-	-	-	-	-	-	21,193		41,196
Office Supplies	-	14,000	-	1,000	-	100	300	-	15,000		56,300
Telephone Charges	-	7,000	-	250	-	30	100	-	10,000		66,580
Advertising	_	1,800	_	200	_	-	30	_	1,320		8,355

GRAND RAPIDS HOUSIN

	Scattered H.O.	Vouchers Admin	Vouchers HAP	Mainstream	EHV	Mod Rehab I	Mod Rehab 4	ROSS FSS	Central Office	Elim.	Totals
Communications	-	22,000	-	1,350	225	100	475	-	2,700		31,435
Dues/Memberships/Subscriptions	-	6,000	-	700	-	20	100		4,400		21,780
Eviction/Collection Costs	-	-	-	-	-	-	-	-	-		55,200
IT Related	-	75,000	-	5,000	-	150	1,500		60,000		287,650
Copy Machine	-	2,500	-	100	-	15	75	-	2,000		27,250
Portable Admin Fee	-	6,000	-		-	-	-	-	-		6,000
Rent Free Unit	-	-	-		-	-	-	-	-		11,724
Postage	-	15,000	-	1,000	-	100	450	-	7,500		35,750
Other Sundry	500	16,000	-	1,500	-	175	500	-	28,000		58,975
Management Fee	-	492,972	-	34,857	5,927	2,304	12,384	-	-	(1,059,207.00)	-
Asset Management Fee	-	-	-		-	-	-	-	-	-	-
Bookkeeping Fee	-	308,108	-	21,785	3,704	1,440	7,740	-	-	(360,597.30)	-
Total Administrative	1,500	2,982,890	-	222,904	54,683	13,462	58,344	-	1,917,007	(1,419,804)	6,042,825
Tenant Services:											
Tenant Services - Salaries	-	-	-	-	-	-	-	334,827	-		799,137
Tenant Services- Benefits	-	-	-	-	-	-	-	143,092	-		340,779
Tenant Services-Other	-	-	-	-	2,000	-	-	-	-		31,000
Protective Services											288,440
Total Tenant Services	-	-	-	-	2,000	-	-	477,919	-	-	1,459,356
Utilities:											
Water	500	4,000	-	-	-	-	-	-	-		273,000
Electricity	700	5,000	-	-	-	-	-	-	-		565,900
Gas	2,700	6,500	-	-	-	-	-		-		334,400
Internet	-	15,445	-	775	-	-	25		1,500		41,420
Total Utilities	3,900	30,945	-	775	-	-	25	-	1,500	-	1,214,720
Maintenance:											
Maintenance Labor	-	-	-	-	-	-	-	-	-		591,668
Maintenance Materials	500	50	-	-	-	-	-	-	-		126,550
Cleaning Supplies	-	100	-	-	-	-	-	-	-		23,500
Painting Supplies	-	25	-	-	-	-	-		-		22,025
Appliances	-	-	-	-	-	-	-	-	-		416,600
Other Supplies	-	3,500	-	-	-	-	-	-	-		17,100
Inspections	700	12,000	_	150	_	_	-		_		37,600

GRAND RAPIDS HOUSIN

	Scattered H.O.	Vouchers Admin	Vouchers HAP	Mainstream	EHV	Mod Rehab I	Mod Rehab 4	ROSS FSS	Central Office	Elim.	Totals
Exterminating	-	250	-	-	-	-	-	-	-		167,750
Heating & Cooling Repairs	1,100	1,000	-	50	-	-	-	-	-		190,150
Elevator Maintenance	-	-	-	-	-	-	-	-	-		55,700
Lawn Care	350	1,000	-	-	-	-	-	-	-		60,050
Snow Plowing	-	1,500	-	-	-	-	-	-	-		57,000
Electrical Repairs	-	-	-	-	-	-	-	-	-		26,500
Carpet/Tile Replacement	-	-	-	-	-	-	-	-	-		250,000
Plumbing Repairs	500	-	-	-	-	-	-	-	-		170,800
Other Contract Costs	1,000	500	-	-	-	-	-	-	-		291,500
Janitorial contracts	-	5,000	-	200	-	-	-	-	-		5,200
Trash Removal	-	-	-	-	-	-	-	-	-		125,500
Maintenance Travel	150	-	-	-	-	-	-	-	-		5,100
Maintenance Benefits	-	-	-	-	-	-	-	-	-		276,351
Painting	-	-	-	20	-	-	-	-	-		116,020
Total Maintenance	4,300	24,925	-	420	-	-	-	-	-	-	3,032,664
General Expenses:											
Insurance	1,282	-	-	-	-	-	-	-	4,323		222,15
Mortgage Insurance	-	-	-	-	-	-	-	-	-		18,250
Workers Comp. Insurance	-	2,491	-	283	-	12	27	405	1,775		9,174
PILOT	-	-	-	-	-	-	-	-	-		195,927
Casualty Loss	-	-		-	-	-	-	-	-		-
Bad Debt-Tenants	-	-	-	-	-	-	-	-	-		45,250
Interest-Mortgage	-	-	-	-	-	-	-	-	-		523,940
Other General Expense	-	10,000		-	-	-	-	-	-		10,000
Housing Assistance	-	-	28,219,708	1,986,828	372,416	121,080	480,912	-	-	(3,537,049)	27,643,895
Housing Assistance: HO	-	-	206,208	-	-	-	-	-	-		206,208
Housing Assistance: NED	-	-	859,200	-	-	-	-	-	-		859,200
Housing Assistance: Enhanced	-	-	128,880	-	-	-	-	-	-		128,880
FSS Escrow	-	-	105,000	-	-	-	-	-	-		110,000
Depreciation	3,507	41,226	-	776	-	84	452	-	72,568		1,190,752
Amortization	-	-	-		-	-	-	-	-		5,56
Total General Expenses	4,789	53,717	29,518,996	1,987,887	372,416	121,176	481,391	405	78,666	(3,537,049)	31,169,193
Fotal Expenses	14,489	3,092,476	29,518,996	2,211,986	429,099	134,638	539,760	478,324	1,997,173		42,918,758

GRAND RAPIDS HOUSIN

	Scattered H.O.	Vouchers Admin	Vouchers HAP	Mainstream	EHV	Mod Rehab I	Mod Rehab 4	ROSS FSS	Central Office	Elim.	Totals
Net Income (Loss)	56,611	(259,559)	2,131,340	8,165	4,590	543	12,164	(0)	324,451	-	1,871,430
Cash flow reconciliation:											
Add: Depreciation expense	3,507	41,226	-	776	-	84	452	-	72,568		1,196,313
Add: Paid from escrow or reserve											348,484
Add/Less: Accrued Interest payable to GRHC									(396,538)		(252,852)
Add: Capital Fund operations											460,000
Add: Principal pmts mortgage rec	2,760										2,760
Add: Anticipated Adjustments		300,000		-	-	-	-				365,000
Less: Mortgage principal payments											(317,523)
Less: Replacement reserve deposits											(78,102)
Less: Voluntary reserve deposits											(151,996)
Less: Capital items from operations									-		-
Less: IT Capital items from operations									-		-
Add/Less: MTW Transfer			(300,000)								(300,000)
Net estimated cash flow	62,878	81,667	1,831,340	8,941	4,590	627	12,616	(0)	482	-	3,143,514

ATTACHMENT H

Grand Rapids Housing Commission Fair Market Rent and Voucher Payment Standard Schedule Kent County Effective January 01, 2024

All unit types	0BR	1BR	2BR	3BR	4BR	5BR	6BR	
2024 FMRs	1,093	1,142	1,369	1,785	1,963	2,257	2,552	
	,	,	,	,	9	,	,	
Voucher Payment Standard (VPS)	0BR	1BR	2BR	<u> 3BR</u>	<u> 4BR</u>	<u> 5BR</u>	6BR	
NEW VPS	1 202	1.256	1 506	1 964	2 159	2.483	2.807	

FMRs: 01/01/2024

VPS (110% of FMRs): 01/01/2024

Utility Allowance: 03/01/2023

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



Locality			Green Discount	Unit Type		Weather Code	Date			
Kent County - 2024			None	Row House & A	partment	MI073	2024-01-01			
Utility/Service		Monthly Dollar Allowances								
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR			
Space Heating	Natural Gas	\$27	\$32	\$37	\$42	\$47	\$52			
	Bottle Gas									
	Electric Resistance	\$60	\$70	\$92	\$114	\$135	\$157			
	Electric Heat Pump	\$44	\$52	\$62	\$70	\$78	\$85			
	Fuel Oil									
Cooking	Natural Gas	\$2	\$3	\$4	\$5	\$6	\$8			
	Bottle Gas									
	Electric	\$9	\$11	\$16	\$21	\$26	\$33			
	Other									
Other Electric		\$45	\$53	\$73	\$94	\$114	\$135			
Air Conditioning		\$6	\$8	\$16	\$22	\$29	\$36			
Water Heating	Natural Gas	\$7	\$8	\$12	\$16	\$20	\$23			
	Bottle Gas									
	Electric	\$31	\$36	\$46	\$59	\$72	\$83			
	Fuel Oil									
Water		\$22	\$24	\$31	\$43	\$54	\$65			
Sewer		\$36	\$38	\$53	\$75	\$96	\$118			
Electric Fee		\$9	\$9	\$9	\$9	\$9	\$9			
Natural Gas Fee		\$16	\$16	\$16	\$16	\$16	\$16			
Fuel Oil Fee										
Bottled Gas Fee										
Trash Collection		\$25	\$25	\$25	\$25	\$25	\$25			
Range/Microwave		\$21	\$21	\$21	\$21	\$21	\$21			
Refrigerator		\$25	\$25	\$25	\$25	\$25	\$25			
Other - specify										

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



Locality			Green Discount	Unit Type		Weather Code	Date				
Kent County - 2024			None	Single Family Hou	ise	MI073	2024-01-01				
Utility/Service			Monthly Dollar Allowances								
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR				
Space Heating	Natural Gas	\$31	\$36	\$42	\$48	\$54	\$61				
	Bottle Gas										
	Electric Resistance	\$97	\$114	\$135	\$155	\$175	\$194				
	Electric Heat Pump	\$52	\$61	\$73	\$82	\$91	\$100				
	Fuel Oil										
Cooking	Natural Gas	\$2	\$3	\$4	\$5	\$6	\$8				
	Bottle Gas										
	Electric	\$9	\$11	\$16	\$21	\$28	\$33				
	Other										
Other Electric		\$52	\$61	\$85	\$109	\$133	\$159				
Air Conditioning		\$5	\$6	\$16	\$25	\$35	\$44				
Water Heating	Natural Gas	\$7	\$8	\$12	\$16	\$20	\$23				
	Bottle Gas										
	Electric	\$31	\$36	\$47	\$61	\$72	\$83				
	Fuel Oil										
Water		\$22	\$24	\$31	\$43	\$54	\$65				
Sewer		\$36	\$38	\$53	\$75	\$96	\$118				
Electric Fee		\$9	\$9	\$9	\$9	\$9	\$9				
Natural Gas Fee		\$16	\$16	\$16	\$16	\$16	\$16				
Fuel Oil Fee											
Bottled Gas Fee											
Trash Collection		\$25	\$25	\$25	\$25	\$25	\$25				
Range/Microwave		\$21	\$21	\$21	\$21	\$21	\$21				
Refrigerator		\$25	\$25	\$25	\$25	\$25	\$25				
Other - specify											

2015 UA

Grand Rapids Housing Commission Fair Market Rent and Voucher Payment Standard Schedule Ottawa County Effective January 01, 2024

All unit types	0BR	1BR	2BR	3BR	4BR	5BR	6BR
2024 FMRs	931	1,115	1,260	1,665	1,775	2,041	2,308
		,	,	,	,	,	,
M. I. D. (C) I I (MDC)	ADD	1DD	4 DD	2DD	4DD	ZDD.	(DD
Voucher Payment Standard (VPS)	ORK	IRK	2BK	SBK	4BK	SRK	6BR
NEW VPS	1,024	1,227	1,386	1,832	1,953	2,245	2,538

FMRs: 01/01/2024

VPS (110% of FMRs): 01/01/2024

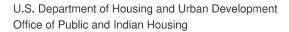
Utility Allowance: 03/01/2023

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



Locality			Green Discount	Unit Type		Weather Code	Date
Ottawa County - 2024			None	Row House & Ap	partment	MI073	2024-01-01
Utility/Service				Monthly Dolla	r Allowances		
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Space Heating	Natural Gas	\$27	\$32	\$37	\$42	\$47	\$52
	Bottle Gas	\$87	\$103	\$119	\$135	\$151	\$167
	Electric Resistance	\$37	\$44	\$58	\$71	\$85	\$98
	Electric Heat Pump	\$28	\$33	\$39	\$44	\$49	\$53
	Fuel Oil	\$114	\$134	\$155	\$176	\$197	\$218
Cooking	Natural Gas	\$2	\$3	\$4	\$5	\$6	\$8
	Bottle Gas	\$7	\$9	\$13	\$16	\$20	\$24
	Electric	\$6	\$7	\$10	\$13	\$16	\$20
	Other						
Other Electric		\$28	\$33	\$46	\$59	\$72	\$85
Air Conditioning		\$4	\$5	\$9	\$12	\$16	\$19
Water Heating	Natural Gas	\$7	\$8	\$12	\$16	\$20	\$23
	Bottle Gas	\$23	\$27	\$39	\$51	\$63	\$74
	Electric	\$19	\$23	\$29	\$36	\$43	\$49
	Fuel Oil	\$30	\$35	\$50	\$66	\$81	\$97
Water		\$19	\$19	\$25	\$33	\$41	\$49
Sewer		\$22	\$24	\$32	\$44	\$56	\$68
Electric Fee		\$17	\$17	\$17	\$17	\$17	\$17
Natural Gas Fee		\$14	\$14	\$14	\$14	\$14	\$14
Fuel Oil Fee							
Bottled Gas Fee							
Trash Collection		\$21	\$21	\$21	\$21	\$21	\$21
Range/Microwave		\$21	\$21	\$21	\$21	\$21	\$21
Refrigerator		\$25	\$25	\$25	\$25	\$25	\$25
Other - specify							

2015 UA₄





Locality			Green Discount	Unit Type		Weather Code	Date
Ottawa County - 2024			None	Single Family Hou	se	MI073	2024-01-01
Utility/Service				Monthly Dolla	r Allowances		
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Space Heating	Natural Gas	\$31	\$36	\$42	\$48	\$55	\$61
	Bottle Gas	\$98	\$116	\$135	\$155	\$174	\$193
	Electric Resistance	\$61	\$72	\$84	\$97	\$109	\$121
	Electric Heat Pump	\$33	\$38	\$46	\$51	\$57	\$63
	Fuel Oil	\$128	\$151	\$176	\$201	\$227	\$252
Cooking	Natural Gas	\$2	\$3	\$4	\$5	\$6	\$8
	Bottle Gas	\$7	\$9	\$13	\$16	\$20	\$24
	Electric	\$6	\$7	\$10	\$13	\$17	\$20
	Other						
Other Electric		\$33	\$38	\$53	\$68	\$83	\$99
Air Conditioning		\$3	\$4	\$9	\$14	\$19	\$24
Water Heating	Natural Gas	\$7	\$8	\$12	\$16	\$20	\$23
	Bottle Gas	\$23	\$27	\$39	\$51	\$63	\$74
	Electric	\$19	\$23	\$29	\$36	\$43	\$49
	Fuel Oil	\$30	\$35	\$50	\$66	\$81	\$97
Water		\$19	\$19	\$25	\$33	\$41	\$49
Sewer		\$22	\$24	\$32	\$44	\$56	\$68
Electric Fee		\$17	\$17	\$17	\$17	\$17	\$17
Natural Gas Fee		\$14	\$14	\$14	\$14	\$14	\$14
Fuel Oil Fee							
Bottled Gas Fee							
Trash Collection		\$21	\$21	\$21	\$21	\$21	\$21
Range/Microwave		\$21	\$21	\$21	\$21	\$21	\$21
Refrigerator		\$25	\$25	\$25	\$25	\$25	\$25
Other - specify							

2015 UA

Grand Rapids Housing Commission Flat Rent Schedule, LIPH Program Effective January 01, 2024

All unit types	1BR	2BR	3BR	4BR
2024 FMRs	1,093	1,142	1,369	1,785
	ĺ			
Flat Rent	1BR	2BR	3BR	4BR
NEW FLAT RENT	875	914	1,095	1,428

FMRs: 01/01/2024

Flat Rent (80% of FMRs): 01/01/2024

Utility Allowance: 03/01/2023

ATTACHMENT I

RESIDENT ADVISORY BOARD

(Minutes available after the RAB meets in February or March)

ATTACHMENT J

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

U. S Department of Housing and Urban Development

Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

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

l,	, the	
Official's Name		Official's Title
certify that the 5-Year PHA Plan for year of the		and/or Annual PHA Plan for fiscal is consistent with the
Consolidated Plan or State Consolidated Housing Choice or Assessment of Fair I	_	1 \
	Local Jurisdiction Nan	пе
pursuant to 24 CFR Part 91 and 24 CFR	§ 903.15.	
Provide a description of how the PHA P State Consolidated Plan.	lan's contents are	consistent with the Consolidated Plan or
hereby certify that all the information stated herein, as well as any in prosecute false claims and statements. Conviction may result in crimi		
Name of Authorized Official:	Title:	
Signature:	Date:	

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

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

ATTACHMENT K

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

U.S. Department of Housing and Urban Development

Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the _____ 5-Year and/or_X_ Annual PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 7/1/2024_, in connection with the submission of the Plan and implementation thereof:

- 1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
- 2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
- 3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
- 4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
- 5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
- 6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
- 7. The PHA will affirmatively further fair housing, 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). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its 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 maintains records reflecting these analyses and actions.
- 8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
- 9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- 10. 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.
- 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
- 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
- 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
- 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
- 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Grand Rapids Housing Commission PHA Name	n	MI073_ PHA Number/HA	A Code	
X Annual PHA Plan for Fiscal Year	2024			
5-Year PHA Plan for Fiscal Years	20 20			
hereby certify that all the information stated herein, as we prosecute false claims and statements. Conviction may res			-	g: HUD will
Name of Executive Director Lindsey S. Reames		Name Board Chairman	Monica Steimle-App	
		*		
Signature	Date	Signature		Date

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

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Civil Rights Certification (Qualified PHAs)

U.S. Department of Housing and Urban Development

Office of Public and Indian Housing OMB Approval No. 2577-0226 Expires 3/31/2024

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning __7/1/2023______ in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seg.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, 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). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its 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 maintains records reflecting these analyses and actions.

_Grand Rapids Housing	g Commission	_MI073		
PHA Name		PHA Number/HA	PHA Number/HA Code	
2 2	nt above, as well as any information provided ction may result in criminal and/or civil penalt		ue and accurate. Warning: HUD will prosecute 1 U.S.C. 3729, 3802)	
Name of Executive Director: Lindsey S. Reames		Name of Board Chairpe	Name of Board Chairperson: Monica Steimle-App	
Signature	Date	Signature	Date	

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