

# Greater Dayton Premier Management 2023 PHA Annual Plan



<b>Annual PHA Plan</b>  <b>(Standard PHAs and Troubled PHAs)</b>	<b>U.S. Department of Housing and Urban Development</b>	<b>OMB No. 2577-0226</b>
	<b>Office of Public and Indian Housing</b>	<b>Expires: 03/31/2024</b>

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

**Applicability.** Form HUD-50075-ST is to be completed annually by **STANDARD PHAs** or **TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

**Definitions.**

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

A.	PHA Information.																	
A.1	<p><b>PHA Name:</b> <u>Greater Dayton Premier Management (Dayton MHA)</u> <b>PHA Code:</b> <u>OH005</u></p> <p><b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p><b>PHA Plan for Fiscal Year Beginning:</b> <u>07/1/2023</u></p> <p><b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p><b>Number of Public Housing (PH) Units:</b> 2,499 <b>Number of Housing Choice Vouchers (HCVs):</b> 4,555</p> <p><b>Total Combined Units/Vouchers:</b> 7,054</p> <p><b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <ul style="list-style-type: none"> <li>Copies of the FY2023 Annual PHA Plan are available at <a href="http://www.gdpm.org">www.gdpm.org</a> , GDPM Central Office at 400 Wayne Avenue, Dayton, OH 45410, Metrowide Council members received certified mailed copies.</li> <li>Copies of the Plan are available at all GDPM Asset Management Properties: 465 Grand Ave, Dayton, OH 45410; 2765 Wentworth Ave, Dayton OH 45406; 110 Melba St, Dayton, OH 45417; 700 Mount Crest, Dayton, OH 45403; 220 Park Manor, Dayton, OH 45410; 126 W Fifth Ave, Dayton, OH 45402; 811 Oldfield Ave, Dayton, OH 45417;</li> </ul> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%;"> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </table>				Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV						
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<b>B.</b>	<b>Plan Elements</b>	<b>See details in the narrative starting on page 5.</b>				
<b>B.1</b>	<p><b>Revision of PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y   N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>					
<b>B.2</b>	<p><b>New Activities.</b> (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y   N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>					

<b>B.3</b>	<b>Progress Report.</b> Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.
<b>B.4</b>	<b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
<b>B.5</b>	<b>Most Recent Fiscal Year Audit.</b> <ul style="list-style-type: none"> <li>Were there any findings in the most recent FY Audit?  Y    N  <input type="checkbox"/>   <input checked="" type="checkbox"/> </li> <li>If yes, please describe:</li> </ul>
<b>B.8</b>	<b>Troubled PHA.</b> (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y    N    N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>  (b) If yes, please describe:
<b>C.</b>	<b>Other Document and/or Certification Requirements.</b>
<b>C.1</b>	<b>Resident Advisory Board (RAB) Comments.</b>  (a) Did the RAB(s) provide comments to the PHA Plan?  Y    N <input type="checkbox"/> <input checked="" type="checkbox"/> No comments were been received.  (a) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
<b>C.2</b>	<b>Certification by State or Local Officials.</b>  Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.
<b>C.3</b>	<b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b>  Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.
<b>C.4</b>	<b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.  (a) Did the public challenge any elements of the Plan? Y    N  <input type="checkbox"/> <input checked="" type="checkbox"/>  If yes, include Challenged Elements.
<b>C.5</b>	<b>Troubled PHA.</b>  (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y    N    N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>  (b) If yes, please describe:

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

### **B.1 REVISION OF PLAN ELEMENTS**

#### **Statement of Housing needs and Strategy for Addressing Housing Needs (no change)**

GDPM's housing needs and strategy have not changed since the previous PHA 5YR plan, approved May 6, 2020. In order to identify the housing needs for Montgomery County, GDPM utilized the housing needs assessment data contained in Montgomery County's current Consolidated Plan, along with GDPM's waitlist data.

According to the Consolidated Plan (ConPlan), increasing the supply of affordable housing through preserving existing affordable units and expanding the supply of new affordable units is an ongoing priority. Households with incomes at 50% or below the area median income have the greater number of housing problems. Households with incomes less than 30% of AMI are more affected than households in other income categories. One of the greatest housing problems is the number of households with a housing cost burden greater than 50% of their income. The ConPlan indicates that 9,657 of renter households pay more than 50% of their income on housing.

The ConPlan, housing needs assessment also indicates that the supply and quality of affordable housing, specifically for households at or below 30% of AMI is insufficient. The ConPlan identifies 66% of the rental units in Montgomery County 42 years old or greater.

GDPM has adopted the following strategies to address the housing needs in Montgomery County:

- Preserve GDPM's portfolio and address capital needs. Specifically:
  - Utilize all available HUD programs and resources such as Rental Assistance Demonstration (RAD), Voluntary Conversion, Section 18 Demolition and Disposition and Choice Neighborhoods, to advance goals of the GDPM redevelopment plan
  - Incorporate energy savings measures and green technologies to reduce utility bills and enhance living environments
- Expand the supply of affordable housing
  - Apply for additional Housing Choice Vouchers (HCV), where appropriate
  - Acquire and/or build developments to expand GDPM's portfolio offerings
  - Encourage assisted units in private developments throughout Montgomery County
  - Seek partnerships in order to create leverage opportunities for additional housing options
- Create access to affordable housing in areas of opportunity & promote deconcentration
  - Conduct outreach efforts to potential HCV landlords
  - Seek to acquire land or buildings for development in identified areas of opportunity per the Kirwan Opportunity Maps, or other acceptable resource
  - Encourage assisted units in private developments throughout Montgomery County
  - Evaluate methods to promote Public Housing deconcentration and income mixing in developments with average family incomes outside the upper or lower Established Income Range (EIR) as defined in 24 CFR 903.2(c) (1) (iii) (e.g., bringing higher income public housing households into lower income public housing developments)
  - Encourage homeownership opportunities through the Family Self-Sufficiency program

GDPM's most recently approved 5 Year PHA Plan can be found here:

<https://www.gdpm.org/wp-content/uploads/2019/11/GDPM-2020-2025-5Y-FY20-Annual-Plans.pdf>

**Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions (no change)**

GDPM's deconcentration policy complies with the income targeting requirements at 24 CFR Part 903; rule to Deconcentration Poverty and Promote Integration in Public Housing.

GDPM's policy contained within the agency's Admission and Continued Occupancy Policy (ACOP) (starting on page 94). The ACOP can be found here: <https://www.gdpm.org/wp-content/uploads/2019/11/ACOP-edited-May-31-2019.pdf>. The ACOP contains all of GDPM's eligibility, selection and admissions policies for the public housing program.

GDPM's maintains eligibility, selection and admissions policies for the housing choice voucher program (HCV) and Rental Assistance Demonstration and Project Based Voucher (PBV) units owned by GDPM. These policies can be located here:

<https://www.gdpm.org/wp-content/uploads/2022/03/GDPM-HCV-Admin-Plan.pdf>

**Financial Resources- Estimated**

Sources	Planned \$	Planned Uses
<b>Subsidy and Transfer Payments -Estimated</b>		
Public Housing Operating Subsidy	8,892,427	Public Housing Operations
Public Housing Operating Subsidy (Tax Credit)	49,130	Public Housing Operations
Public Housing Operating Subsidy (Tax Credit)	40,378	Public Housing Operations
Housing Choice Voucher/Mod Rehab/SRO Program subsidy	27,558,554	Voucher Program Assistance Payments
Voucher Program Administrative Fee	2,824,458	Administration of Voucher Programs
<b>Public Housing Dwelling Rental Income</b>	4,775,043	Public Housing Operations
<b>Federal Grants (FY 2023 estimated)</b>		
Capital Fund Program (CFP) & Demolition, Disposition & Transitional Funding (DDTF)	7,000,000	PH Capital Improvement, PH Operations, and Development
<b>Unobligated Grant Funds</b>		
Capital Fund Program	23,428,523	Public Housing Capital Improvement
Family Self-Sufficiency (FSS) Grant	0	Resident Services
Jobs Plus Grant	0	Resident Job Readiness Support
Choice Neighborhoods (CN)	0	Neighborhood Revitalization Planning
<b>Other Income Sources</b>		
Investment Interest	10,000	Public Housing Operations
<b>Estimated Total Resources</b>	74,578,513	

**Rent Determinations (no change):**

GDPM's rent determination policies for public housing, housing choice voucher and RAD/PBV units can be located through the following links:

Public Housing: <https://www.gdpm.org/wp-content/uploads/2019/11/ACOP-edited-May-31-2019.pdf>

Housing Choice Voucher & Rental Assistance Demonstration and Project Based Voucher (PBV) units owned by GDPM: <https://www.gdpm.org/wp-content/uploads/2022/03/GDPM-HCV-Admin-Plan.pdf>

## **Operation and Management:**

The guiding documents for GDPM's rules, standards, and policies for the maintenance and management of housing owned, assisted, or operated by GDPM, including pest control can be located in each housing programs policy document. The policy documents are as follows:

Public Housing: <https://www.gdpm.org/wp-content/uploads/2019/11/ACOP-edited-May-31-2019.pdf>

Housing Choice Voucher & Rental Assistance Demonstration and Project Based Voucher (PBV) units owned by GDPM: <https://www.gdpm.org/wp-content/uploads/2022/03/GDPM-HCV-Admin-Plan.pdf>

GDPM's 2020-2025 PHA 5 Year and Annual Plan contains anticipated updates to GDPM operations through 2025. The document can be found here: <https://www.gdpm.org/wp-content/uploads/2019/11/GDPM-2020-2025-5Y-FY20-Annual-Plans.pdf>

A list of the specific operation and management modifications that may occur during the fiscal year include:

- Housing Mobility Pilot Program
- HCV Preferences
- HCV Waitlist and Special programs
- Conversions through RAD using both PBV and PBRA and a variety of funding sources
- Asset Management Scattered Sites Incentive Transfer Program
- Implementation of Small Area Fair Market Rents
- Implementation of Over-income policy

Additional operation and management modifications that may occur over the next year include:

- Remote work operations in response to the COVID-19 Pandemic
- Remote options for the delivery of resident service programs for all GDPM owned and operated properties

GDPM intends engage consulting services to assist with updating and revising agency wide policy documents, as necessary.

## **Homeownership Programs (no change)**

GDPM administers a HCV homeownership program through its Family Self Sufficiency Department (FSS) to provide homeownership opportunities for HCV participants. The HCV homeownership program continuously seeks partnership opportunities to increase participation and leverage resources. GDPM implemented an Individual Development Account program with grant funds from the Ohio CDC Association the program will be available until funds are depleted. Additionally, in connection with a local Community Development Finance Institution, GDPM may seek to expand this program if Capital Magnet Fund resources are awarded to the CDFI.

## **Community Service and Self-Sufficiency Programs**

GDPM operates the HUD Family Self-Sufficiency (FSS), ROSS (Resident Opportunity and Self Sufficiency Coordinator) and Jobs Plus programs in an effort to empower residents toward self-sufficiency. Each program has specific goals and requirements but are all designed to provide access to supportive services and necessary resources to assist residents in increasing their economic position. All of the programs are grant funded. GDPM will continue to apply for FSS and ROSS funding. The Jobs Plus program is a placed based program located at AMP 7. In 2022, GDPM completed initial phase of implementation of new FSS Final Rule and regulatory changes at 24 CFR 984.

## **Safety and Crime Prevention (no change)**

GDPM employs a former police officer to lead its Security Department. The Security Coordinator served as a law enforcement officer on the City of Dayton's Police Department for twenty years. The Coordinator's employment has afforded GDPM the opportunity to engage in an excellent collaboration with local law enforcement. Two of the most valuable collaborative measures GDPM and local law enforcement have engaged in includes strict enforcement of a comprehensive trespass policy and the formation of a GDPM Task Force. GDPM maintains a contract with the City of Dayton Police to implement the GDPM Task Force. The contract provides three full-time officers that service the GDPM, portfolio.



**Violence Against Women Act (VAWA) (no change)**

In 2017, GDPM drafted and implemented its agency wide VAWA Policy and Emergency Transfer Plan. GDPM's General Counsel provided VAWA training for all property managers. To ensure uniformity and access across GDPM's programs, it implemented the same VAWA Policy into its RAD Program. A copy of the VAWA Policy, including the RAD language is contained within GDPM's 2020-2025 5 Year Plan: <https://www.gdpm.org/wp-content/uploads/2019/11/GDPM-2020-2025-5Y-FY20-Annual-Plans.pdf>

**Pet Policy (no change)**

GDPM's Pet Policy is contained within the ACOP: <https://www.gdpm.org/wp-content/uploads/2019/11/ACOP-edited-May-31-2019.pdf>

The pet policy is intended to establish clear guidelines for ownership of pets in Public Housing and to ensure that no applicant or resident is discriminated against regarding admission or continued occupancy because of ownership of pets. Individuals with disabilities may request to have an animal by submitting a Reasonable Accommodation as detailed within the ACOP.

**ASSET MANAGEMENT**

To date, GDPM has converted 346 units from Public Housing to PBV under RAD. As part of the conversion, GDPM has adopted resident rights, resident participation, and waiting list and grievance procedures as delineated in PIH Notice PIH-2019-23, REV-4. These provisions are provided in Chapter 39 of the GDPM's HCV Admin Plan:

<https://www.gdpm.org/wp-content/uploads/2022/03/GDPM-HCV-Admin-Plan.pdf> Further, the RAD conversions comply with all applicable site selection and neighborhood review standards and that all appropriate procedures are being followed.

Development number	Site or AMP Name(s)	Current Public Housing (ACC) General Occ/Senior Units	Units converted through RAD
OH005000001	Scattered Sites (Holt, Bruce, Hudson, Cherry, Redwood, Niagara, Theodore & Norman) (44 units) Hallmark-Meridian (75 units)	236	119
OH005000002	Lorie Sue (6 units) Frederick Pike (6 units)	318	12
OH005000003	Westdale	346	0
OH005000004	Cityview (10 units) Argella (4 units) Revere (8 units)	259	22
OH005000005	Quitman (6 units)	367	6
OH005000006	Telford Shroyer (24 units) Southern Montgomery County (Madrid, Indian Trails, Westerfield, Washington Village) (163 units)	208	187
OH005000007	Desoto Bass Courts	499	0
OH005000010	Scattered Sites (H.O.)	7	0
OH005000011	Dayton View Senior Village & Commons	55	0
OH005000013	Windcliff Village	25	0
OH005000014	Germantown Village	15	0
OH005000016	Audubon Crossing	22	0
OH005071000	Telford & Corona	15	0
		<b>2372</b>	<b>346</b>

HUD designed RAD to assist with addressing the capital needs of public housing by providing housing authorities with access to private sources of capital in order to repair, replace and/or preserve its affordable housing assets. It should be noted that upon a conversion, GDPM's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that GDPM may borrow funds to address the RAD developments' capital needs. GDPM currently has debt under the Capital Fund Financing Program and will be working with its lender to address the debt which may result in additional reductions of the Capital Fund.

Under its portfolio award, GDPM has received individual Commitments to Enter into a Housing Assistance Payment Contract (CHAP) for several properties and has submitted financing plans for properties as well. GDPM will continue to request and modify CHAP requests according its development plan schedule which is included as an attachment to this plan.

GDPM anticipates utilizing its Capital Fund to support the advancement of its redevelopment plan with RAD as the primary tool. The estimated Capital Fund investment for GDPM's Redevelopment Plan, including RAD is approximately \$50M. The full redevelopment plan is included as Attachment #2 and may be modified depending upon funding availability and physical needs.

HUD has made various strategies available to public housing agencies (PHAs) to reposition public housing developments and released a new guide. GDPM intends to utilize these strategies and all tools available to preserve affordable housing units, address rehabilitation and physical needs, and place properties in an increased financial position.

#### **Substantial Deviation (no change)**

**“Substantial Deviation” is defined as follows:**

1. Additions of non-emergency work items (items not included in the Annual statement or 5-year Action plan) or change in use of replacement reserve funds under Capital Fund.
2. Any change with regard to demolition or disposition, designation, homeowner programs or conversion activities.
3. Fundamental alteration of the goals, mission or objectives of GDPM.
4. The definition of Substantial Deviation/Modification of GDPM's Plan is amended to exclude the following items:
  - a. Actions due to HUD regulatory requirements;
  - b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the conversion will include use of additional Capital Funds;
  - c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
  - d. Changes to the financing structure for each approved RAD conversion.
  - e. The decision to convert to either Project Based Assistance or Project Based Voucher Assistance.

#### **Significant Amendment/Substantial Deviation (no change)**

**“Significant Amendment” is defined as follows:** A significant amendment or modification to the annual plan is a change in the major strategies to address Housing Needs or changes in Admissions & Occupancy. For the purpose of the CFP, a proposed demolition, disposition, homeownership, Capital Fund financing, development, or mixed finance proposal are considered significant amendments to the CFP 5-Year Action Plan.

The following are not considered significant amendments:

1. Changes in Public Housing Admissions & Occupancy Policies or the Section 8 Administrative Plan that are not inconsistent with the Annual Plan.
2. Changes in Public Housing Admissions & Occupancy Policies or the Section 8 Administrative Plan that are required by federal, state, or local authorities, including laws and regulations.
3. A minor change in the planned uses of financial resources (e.g., small shifts within or between different funding categories).
4. Changes in the plan resulting from consultation with Consolidated Plan authorities including the City of Dayton and Montgomery County, Ohio.
5. Changes that are the result of the loss of anticipated funding to support a specific proposed activity or program.
6. Changes that are due to factors outside of GDPM's control such as natural or man-made disasters that require the redirection of resources to address emerging issues.
7. Technical amendments to correct grammar and spelling mistakes; to adjust the language in the plan document to match the intended board policy as documented by board resolutions and minutes that inadvertently omitted or misstated in the existing plan document; or to update the plan to provide more accurate information that does not impact policies such as corrections to reports on past activities and statistics on housing and population characteristics.

## **B.2 NEW ACTIVITIES**

### **General**

GDPM is continuously seeking ways to improve its efficiency and operations and better serve residents. In 2023, GDPM intends to continue to explore improvements to its Central Office and site management locations, including but not limited to space considerations, including remote work and meeting options, Wi-Fi connections for clients and automated phone services. Where applicable, and allowable per regulation GDPM may utilize PHA operation or CFP funding to support efforts.

### **HCV Program – Housing Mobility Pilot Program**

GDPM, in collaboration with the Infant Mortality Taskforce and other local partners, may seek funding opportunities for a Housing Mobility Pilot Program (Pilot Program). The purpose of the Pilot Program includes decreasing the infant mortality rate in high infant mortality zones, assisting young families or pregnant families to relocate to areas outside of high-infant mortality rate zones, move to high opportunity areas, and development standards for housing to support Social Determinants of Health objectives. The Pilot Program will focus on decreasing the infant mortality rate among low income families, providing education and life skills opportunities to the Pilot Program families, to decrease the amount of homeless families, and advance social determinants of health objectives.

The implementation of the Pilot Program may necessitate GDPM implementing a preference for a targeted group. The preference and Pilot Program selection criteria is based on local housing needs and priorities. Preference points may be given to families with a pregnant member and/or young children that are homeless or in danger of being homeless. GDPM will receive referrals from community partners and applicants that meet the HCV eligibility requirements and the selection criteria for the Pilot Program will be eligible for the preference points. GDPM may open the waitlist for the specific preference category, and may, in its discretion, opt to leave the waitlist open for the specific preference category until GDPM determines that it has sufficient applicants to fulfill the available Pilot Program slots. The Pilot Program will be open to approximately 30 families at any one time who are either (1) current HCV participant families with a pregnant household member and/or with young children; or (2) non-current HCV families with a pregnant member and/or young children that are homeless or in danger of being homeless.

To implement such a program, GDPM may utilize Small Area Fair Market Rents (SAFMRs) for certain areas in order to increase housing choice and mobility options and to effectuate the mission of the Pilot Program. GDPM may alleviate necessary program rules, including, but not limited to, allowing participants to relocate under the Pilot Program initiatives even though the participant has not met occupancy length requirements. In order to facilitate implementation, GDPM will request regulatory waivers and/or HUD approval as needed.

GDPM, the Miami Valley Fair Housing Centers, Legal Aid of Western Ohio and Advocates for Basic Legal Equality, Inc. intend to submit a joint application for funding for the Pilot Program. The Pilot Program intends to request funding in order to provide housing mobility counseling, landlord outreach, supportive legal services, and assistance for increased tenant payments as a result of relocation under the Pilot Program.

### **HCV Preferences**

GDPM may implement a preference for its HCV Program for persons facing expiration of their Family Unification Program voucher. There is a maximum program term of 36 months for FUP vouchers for youth aging out of foster care. For these voucher holders that need continued assisted housing at the expiration of their FUP voucher, GDPM may offer preference points for receipt of a voucher in order for the FUP participant to move to the top of the Waitlist.

### **HCV Waitlist**

GDPM may open its HCV Waitlist for special populations/programs its services under its HCV Program including, VASH, FUP, Mainstream Voucher Program and Mobility Pilot Program participants. GDPM may open the Waitlist specifically for these special programs, and may leave the Waitlist open indefinitely or until GDPM has determined it has a sufficient number of applicants for these special programs on the Waitlist. As GDPM continues to convert properties through the Rental Assistance Demonstration Program (RAD), it may be necessary to modify Waitlist procedure for better efficiency and operations. GDPM will follow the guidelines set-forth in its Administrative Plan when opening and closing the Waitlist.

**CHOICE NEIGHBORHOODS (CN) (OH005000007):** DeSoto Bass Choice Neighborhoods Planning/Action Grant: GDPM (lead applicant) in partnership with the City of Dayton (co-applicant) was awarded with a Choice Neighborhoods Planning/Action Grant. The transformation plan for the redevelopment of AMP 7 which includes Desoto Bass Courts (OH5-2, OH5-2A, OH5-5, 354 units) and Hilltop Homes (OH5-9, 201 units), along with the surrounding neighborhoods was submitted and accepted by HUD. GDPM is committed to improving the developments within AMP 7 and partnering with stakeholders to improve the entire neighborhood. CFP and/or other PHA funds may be utilized to advance this goal, as appropriate. The CN team will apply for CN FY22 Implementation funds (upon NOFA release) for AMP7. GDPM intends to use the awarded funds for any activity allowable under the CN rules and regulations. A copy of the executive summary plan is included as part of this plan, and can be found here: <http://choiceneighborhooddayton.com/wp-content/uploads/2018/08/GDP-Miami-Chapel-booklet-2018-pages.pdf>

**MIXED FINANCE/MODERNIZATION, DEVELOPMENT, RAD:** GDPM will utilize its nonprofit development entity, Invictus Development Group, Inc (IDG), for the financing and ownership of mixed-finance development projects detailed in the attached redevelopment plan (Attachment #2). Since 2017, IDG has been involved in providing low income housing tax credit financing for development projects and seeking private grants and donations to support resident service efforts.

GDPM's Redevelopment Plan proposed to utilize almost every HUD tool available in order to preserve, enhance and expand GDPM's portfolio. Some specific activities underway include:

***Germantown Crossing:*** In 2022, GDPM was awarded 9% tax credits to construct a 50 unit development. The family development will consist of one, two and three bedroom units. Along with the tax credits, GDPM may utilize public housing funds. Tax credit closing is expected to occur in the summer of 2023 and construction should begin shortly thereafter. GDPM may utilize RAD Transfer of Assistance. GDPM has a 50-Unit CHAP for the transfer of assistance form 50 Desoto Bass units. In lieu of RAD transfer of assistance, GDPM may utilize regular or tenant protection project-based vouchers.



**Mixed Finance Development Proposal Wilkinson Replacement:** Although the final scope of work and cost will be determined at a later date, GDPM may submit a development proposal to HUD or request a RAD CHAP, in order to reconstruction, acquire or finance the property(ies) needed for the Wilkinson replacement as described in further detail under “Demolition Activities” below. Such proposal may include a request for authorization for GDPM to enter into a long term ground lease agreement to a tax credit entity in order to facilitate the tax credit financing. Possible sources of funding for the project may include Capital Funds, other PHA funds, bonds, tax credits, non-PHA funding, conventional loans, Federal Home Loan Bank financing and other funding sources. Prior to submitting a Mixed-Finance approval, GDPM may request HUD authorization to use public housing funds for pre-development expenses. GDPM may participate in the RAD Program for the Wilkinson Replacement and will explore transfer of assistance opportunities.

**Mixed Finance Development Proposal Desoto Bass Replacement:** Although the final scope of work and cost will be determined at a later date, GDPM may submit a development proposal to HUD, or request a RAD CHAP, in order to reconstruct, transfer assistance, acquire or finance the property (ies) needed for the Desoto Bass redevelopment as part of the Renew Miami Chapel Plan. Such proposal may include a request for authorization for GDPM to enter into a long term ground lease agreement to a tax credit entity in order to facilitate the tax credit financing. Possible sources of funding for the project may include Capital Funds, other PHA funds, bonds, tax credits, non-PHA funding, conventional loans, Federal Home Loan Bank financing and other funding sources. Prior to submitting a Mixed-Finance approval, GDPM may request HUD authorization to use public housing funds for pre-development expenses. GDPM will also explore all available repositioning tools per HUD’s repositioning guidance, including but not limited to as voluntary conversion, required conversion, RAD/Section 18 blend, Section 18 disposition.

**Renew Miami Chapel Phase I.** On February 9, 2023, GDPM submitted a 9% tax credit application for the Renew Miami Chapel Phase 1 redevelopment of Desoto Bass. This phase includes the demolition of redevelopment, on-site, of up to 50 units. The units will be subsidized with project based vouchers.

**Development through LIHTC and other financing:** see Attachment #2 for a complete list

**Acquisition:** In order to advance GDPM’s redevelopment plan, RAD transfer of assistance opportunities, deconcentrate poverty, provide housing in higher opportunity areas, and expand current developments or increase amenities, GDPM may pursue acquisition activities. Acquisition activities will be funded with eligible GDPM funds such as Capital Funds, Development funds, non-PHA funds and others as identified and eligible.

**Mixed Finance alternative for Redevelopment Plan:** The attached development plan utilizes RAD as the primary development tool. If through analysis, or unsuccessful RAD or Section 18 approvals, GDPM may seek mixed finance alternatives for all of the developments listed in the redevelopment plan (Attachment #2).

#### **DISPOSITION ACTIVITIES:**

**Disposition at Desoto Bass (OH005000007):** GDPM may dispose of a dwelling and non-dwelling units at Desoto Bass Courts-OH5-9, and 1728 Stewart St (in whole or in part). As portfolio analysis is completed, additional demolitions and disposition applications may be considered. 1728 Stewart Street may be disposed of for less than fair market value if the disposition demonstrates a commensurate public benefit such as a day care, community building, or other use to benefit the PHA residents and surrounding community. Section 18 disposition may also be used a repositioning tool to support GDPM’s enclosed redevelopment plan. If eligible, GDPM will seek TPV’s, Asset Repositioning Fees (ARF) and Demolition Disposition Transition Funds (DDTF).

**Disposition of 5H Homeownership Units:** In 2022, GDPM submitted an application requesting HUD approval to dispose of seven homeownership units. GDPM intends to dispose of the public housing properties listed below by sale at Fair Market Value. If GDPM is unable to dispose of the properties for Fair Market Value, it will dispose of the properties via public auction. If eligible, GDPM will seek replacement TPVs. GDPM intends to seek disposition of its scattered sites properties pursuant to HUD Notice PIH 2021-07. The Notice provides guidance for the disposition of scattered sites, such as the units listed below. Due to the distance between units and lack of uniformity of systems, the units are unsustainable to operate and maintain as public housing. Additionally, the properties are physically obsolete. Where appropriate GDPM will seek TPV’s, Asset Repositioning Fees (ARF) and Demolition Disposition Transition Funds (DDTF). The following properties are subject to disposition:

Address	Project #	Bedroom Size	Unit #	Building No.
2005 Val Vista	OH005000010	5	522001	22A
1617 Liscum	OH005000010	4	527001	27A
4826 Burkhardt	OH005000010	3	525001	25A
2056 Hickorydale	OH005000010	3	522004	22D
1706 Hannibal Court	OH005000010	4	533001	33A
1822 Ditzel	OH005000010	5	533002	33B
3000 Germantown	OH005000010	4	533003	33C

***Disposition – HOCH, Willow, Superba, Winters, Gettysburg***

GDPM intends to seek disposition or demolition approval of the following properties:

AMP	Address	#of Units
005OH000004	3004-3005 Superba	24
005OH000005	261 Hoch	6
005OH000005	619 Willow	6
005OH000003	138 N. Gettysburg	5
005OH000003	436-440 Winters	6
005OH000005	443 Quitman	6

The units are obsolete as to physical condition and location and retention of the units is not in the best interest of the residents and GDPM. Further, disposition is consistent with GDPM's goals, the PHA 5YR Plan and is otherwise consistent with the 1937 Act. GDPM may seek disposition through the de minimis exception for up to 5 of the units. GDPM intends to dispose of the properties by sale at Fair Market Value. If GDPM is unable to dispose of the properties at Fair Market Value, it will dispose of the properties via public auction. If eligible, GDPM will seek TPV's, Asset Repositioning Fees (ARF) and Demolition Disposition Transition Funds (DDTF).

***Disposition of Vacant Parcels:*** GDPM owns several vacant real estate parcels in Montgomery County Ohio. A list of identified parcels is included that may be disposed, Attachment #2, page 3. GDPM may seek to identify any GDPM owned vacant parcels that are in excess of the need of GDPM. GDPM will evaluate the feasibility of disposition of the lots. GDPM may seek authorization from the HUD Special Applications Center in order to dispose of some or all of the parcels. Disposition may be by sale at fair market value, by sale at less than fair market value, if the intended land use would be considered to have a commiserate public benefit, for sale by public auction, of GDPM may participate in a 'land-swap' in an interested party has a property of similar value and acquisition of such property would result in a benefit to GDPM and/or it's residents.

**HOPE VI Vacant Parcels:** There are an estimated 18 vacant parcels covering an estimated 3-4 acres of the GDPM HOPE VI Revitalization area. GDPM may evaluate the feasibility of disposition of these vacant lots as well as the remaining vacant lots within GDPM's Asset Management inventory, such as Dunbar Manor, Arlington Courts and all parcels listed in Attachment #3.

**Disposition of Arlington Courts 005OH000006** GDPM may seek authorization from the HUD Special Applications Center in order to dispose of some or all of the parcels associated with the Arlington Courts land. Disposition may be by sale at fair market value, by sale at less than fair market value, if the intended land use would be considered to have a commiserate public benefit, for sale by public auction, of GDPM may participate in a 'land-swap' in an interested party has a property of similar value and acquisition of such property would result in a benefit to GDPM and/or its residents.

**Disposition of Dunbar Manor 005OH020** GDPM may seek authorization from the HUD Special Applications Center in order to dispose of some or all of the parcels associated with the Dunbar Manor land. Disposition may be by sale at fair market value, by sale at less than fair market value, if the intended land use would be considered to have a commiserate public benefit, for sale by public auction, of GDPM may participate in a 'land-swap' in an interested party has a property of similar value and acquisition of such property would result in a benefit to GDPM and/or its residents.

***RAD Properties and RAD/ Section 18 Blending – Disposition:***

Pursuant to HUD-Notice PIH 2021-07 *Demolition and/or disposition of public housing property, eligibility for tenant-protection vouchers and associated requirements*, GDPM intends to seek HUD approval for up to the maximum percentage allowable for all eligible RAD units to be disposed of under Section 18 of the U.S. Housing Act. The disposition will enable GDPM to project-base a percentage of the units outside of RAD. GDPM also intends to utilize HUD's di minimis disposition tool under RAD and set-forth in Notice PIH 2021-07 which allows an additional 5% of the units to be converted to the PBV program outside of RAD.

***Di Minimis Exception to RAD Properties & Disposition*** According to HUD Notice PIH-2019-23, Rev 4 RAD Final Implementation Notice, conversions may not result in a reduction of the number of assisted units, except by a de minimis amount, defined as no more than the greater of five percent of the number of project or portfolio units under ACC immediately prior to conversion or five units. For each of its RAD properties, GDPM may reduce the number of RAD units by up to 5%. In these cases, GDPM intends to dispose of the properties at less than fair market value in order to apply project-based vouchers to the properties under GDPM's Section 8 HCV/PBV Program. Any residents residing in units converting to PBV outside of RAD in the RAD developments will be afforded the same benefits and rights as the residents in the RAD units including the right to return.

***Disposition-Scattered Sites Units:*** In accordance with HUD Notice PIH 2021-07 *Demolition and/or disposition of public housing property, eligibility for tenants-protection vouchers and associated requirements*, GDPM intends to dispose of the following scattered sites properties:

Address	AMP	# of Units
1204 Waterviliet	4	4
5330-5336 Hilgeford	5	4
1250-56 Governors Square	6	4
1301 Red Bluff	6	4

GDPM may dispose of the properties at less than fair market value to a non-profit because the properties may be more efficiently operated as Section 8 PBV units. Any proceeds realized will be used to support GDPM's RAD conversions or other development related items.

**Disposition Proceeds:** GDPM intends to use any proceeds realized from its property dispositions for development related activities, which may include, but is not limited to RAD, Choice Neighborhoods and public housing development.

### **DEMOLITION ACTIVITIES:**

***Demolition of Wilkinson Hi-Rise (OH005000006):*** In 2023, GDPM intends to submit an application to the U.S. Department of Housing and Urban Development's Special Applications Center (SAC) requesting authorization to demolish the Wilkinson. The application may include a request to dispose of the underlying land. The Wilkinson is a hi-rise located at 126 West Fifth Street in the City of Dayton. The Wilkinson, contains 199 1-bedroom dwelling units and one 2-bedroom unit. Any proceeds realized will be used to support future RAD or other development opportunities.

The public housing development is obsolete as to physical condition, location, and other factors, making it unsuitable for housing purposes, and no reasonable program of modifications is cost-effective to return the Wilkinson to its useful life. GDPM will relocate any residents impacted by the demolition and will afford the residents the full protections for which they are entitled under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended ("Uniform Act"). GDPM intends to submit the SAC application during the 5YR Plan period.

***Wilkinson Replacement:*** Although the final scope of work and cost will be determined at a later date, GDPM will request authorization from HUD to expend predevelopment funds for activities related to the replacement of the Wilkinson units. Per 905.612(a)(1), predevelopment expenses include costs of materials and services related to the preparation of a development proposal, as well as other soft costs, such as surveys, appraisals, and architectural/engineering. Additionally, GDPM may submit a development proposal to HUD in order to acquire or finance the property (ies) needed for the Wilkinson replacement.

***Demolition of Hilltop (OH005000007):*** In 2022, HUD approved GDPM's Section 18 Demolition application approving the demolition of Hilltop. Hilltop is a family development located at 631 Groveland Avenue. It has 150 units. Hilltop was included as part of GDPM's Choice Neighborhood Transformation Plan. As part of the Choice Planning application, Hilltop was determined to be obsolete. Additionally, the residents and community engaged in a two year planning process to confirm that demolition is the best option for the site. Demolition may occur in conjunction a RAD conversion. If so, GDPM will replace the units. GDPM may seek Tenant Protection Vouchers, ARF and DDTF where eligible. Any proceeds realized will be used to support future RAD or other development opportunities. GDPM will relocate any residents impacted by the demolition and will afford the residents the full protections for which they are entitled under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended ("Uniform Act").

***Demolition of Desoto Bass (OH005000007):*** GDPM intends to submit an application to the U.S. Department of Housing and Urban Development's Special Applications Center (SAC) requesting authorization to demolish Desoto Bass. The application may include all or only a portion of the site. The application may include a request to dispose of the underlying land. Demolition may occur in conjunction a RAD conversion. If so, GDPM will replace the units. If it the demolition is part of a Section 18 (including partial Section 18) application, GDPM may seek Tenant Protection Vouchers, ARF and DDTF where applicable. Any proceeds realized will be used to support future RAD or other development opportunities. GDPM will relocate any residents impacted by the demolition and will afford the residents the full protections for which they are entitled under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended ("Uniform Act").

***Demolition of Mount Crest (OH005000004):*** GDPM intends to evaluate and possibly submit an application to the U.S. Department of Housing and Urban Development's Special Applications Center (SAC) requesting authorization to demolish Mount Crest. The application may include all or only a portion of the site. The application may include a request to dispose of the underlying land. Demolition may occur in conjunction a RAD conversion. If so, GDPM will replace the units. If it the demolition is part of a Section 18 (including partial Section 18) application, GDPM may seek Tenant Protection Vouchers ARF and DDTF where applicable. Any proceeds realized will be used to support future RAD or other development opportunities. GDPM will relocate any residents impacted by the demolition and will afford the residents the full protections for which they are entitled under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended ("Uniform Act").



***Demolition alternative for Redevelopment Plan:*** The attached development plan utilizes RAD as the primary development tool, as described above. If through analysis, Section 18 demolition is deemed a better alternative, GDPM may seek demolition for all or a portion of the developments listed in the redevelopment plan (Attachment #2).

#### **CONVERSION OF PUBLIC HOUSING- RENTAL ASSISTANCE DEMONSTRATION (RAD):**

GDPM received a Portfolio Award for participation of all GDPM Public Housing units through the HUD Rental Assistance Demonstration (RAD) program. GDPM may choose to convert its entire Asset Management portfolio to Project Based Rental Assistance (PBRA) or Project Based Vouchers (PBV) in accordance with the guidelines under Notice PIH 2019-23, REV-4 and any successor Notices. Upon conversion, GDPM will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6-PIH 2019-23, REV-4: and PIH-2016- 17. These resident rights, participation, waiting list and grievance procedures are contained in the current GDPM Administrative Plan, Chapter 39. Additionally, GDPM certifies that it is currently compliant with all fair housing and civil rights requirements. GDPM certifies that the RAD conversions comply with all applicable site selection and neighborhood reviews and all appropriate processes have been followed. GDPM is not currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing GDPM with access to private sources of capital to repair and preserve its affordable housing assets. Upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that GDPM may also borrow funds to address their capital needs. GDPM will also be contributing Operating Reserves in the amount of \$1,200 per unit and Capital Funds in an amount up to appx. \$30M towards forthcoming conversions. According to GDPM's RAD plan, in 2023, GDPM intends to contribute approximately \$8M. GDPM currently has debt under the Capital Fund Financing Program and will be working with Deutsche Bank to address outstanding debt issues, which may result in additional reductions of Capital Funds.

GDPM comply with HUD RAD Program requirements, including, but not necessarily limited to the Consolidated and Further Continuing Appropriations Act, 2012, Pub. L. No. 112-55, approved November 18, 2011, and the Consolidated and Further Continuing Appropriations Act of 2015 (P.L. 113-235) approved December 6, 2014; Section 8 of the United States Housing Act, 42 U.S.C. 1437 et seq.; and the Department of Housing and Urban Development Act, 42 U.S.C. 3531 et seq. GDPM will evaluate each conversion to determine the best financial benefit for conversion under either PBRA or PBV. The redevelopment plan utilizing RAD as the primary tool is included in Attachment #2.

GDPM's RAD redevelopment plan complies with the applicable site selection requirements and with all applicable site and neighborhood standards. GDPM will maintain records of its analysis and the data relied upon in making its determination of compliance. GDPM determined that its RAD properties are "suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto."

GDPM's RAD policies are located in Chapter 39 of the GDPM Administrative Plan. The plan was created in compliance with PIH Notice 2016-17 Project Based Voucher Requirements & PIH Notice 2019-23 – Rental Assistance Demonstration Final REV 4 and includes several resident protections that will be provided to both its RAD and non-RAD PBV residents in each RAD development. The policies include, but are not limited to, the following:

- Right to Return and Relocation Assistance
- No rescreening of tenants upon conversion
- Under-Occupied Unit
- Phase-in of tenant rent increase
- FSS and ROSS-SC programs
- Resident Participation and Funding
- Termination notification
- Grievance process
- Earned Income Disregard
- Jobs Plus
- When Total Tenant Payment Exceeds Gross Rent
- Establishment of Waiting List
- Choice-Mobility

GDPM's redevelopment plan includes the conversion of all public housing units. GDPM's RAD plan meets the requirements of Section 5.2 of the RAD Fair Housing, Civil Rights, and Relocation Notice PIH 2016-17.

#### **Current RAD Development Plans Include:**

GDPM's complete redevelopment plan is included in Attachment #2. The order of projects and progress may change from year to year based upon funding, analysis, etc. Specific project progress underway is as follows:

#### **Developments and AMPs with Current CHAPS**

<b>Property</b>	<b># of Units</b>	<b>AMP*</b>
Winston Woods	30	2
Wolf Creek	35	2
Hawthorn Village	7	3
Malden Hollencamp	21	3
Winters-Gettysburg	11	3
Huffman-Parnell	11	4
Superba	24	4
Channingway	32	5
Bellefontaine	25	5
Pompano	31	5
Fisher/Wayne Meadows/Misty Lane I	32	5
Fitch-Hawthorn	6	5
Imperial	12	5
Misty Lane II	6	5
Willow-Hoch	12	5
Wilkinson	200	6
<b>Total</b>	<b>495</b>	

#### **2023 RAD Conversions**

In 2023, GDPM intends to convert several public housing properties to the RAD PBV program. In addition to any funding sources listed below, GDPM intends to fund the planned conversions with capital funds and operating reserves. Please refer to the table below for information regarding unit sizes. The conversions include:

- **005000005 Northeast Montgomery County (NEMC):** NEMC is a 126 unit RAD PBV Development made up of the following AMP 5 family public housing developments: Pompano, Bellefontaine, Channingway, Fisher, Wayne Meadows and Misty Lane I & II. All the properties are located in the Northeast Montgomery County. During the RAD conversion, GDPM intends to complete all critical needs and will install radon mitigation systems. The estimated total project cost is approximately \$2.3M which includes an initial deposit to a replacement reserve account in the amount of \$1.9M.
- **005000005/000003 Fitch Hawthorn/Hawthorn Village:** This RAD PBV conversion includes two family public housing properties with 13 units located on a contiguous parcel. The properties are currently in two separate AMPs. Hawthorn Village is in AMP 3 and Fitch-Hawthorn is in AMP 5. GDPM received HUD approval to combine the development into a single RAD development. GDPM intends to complete critical needs and to install radon mitigation systems. The current development budget is appx \$300K which includes an initial deposit to a replacement reserve in the amount of \$215,000.

- **005000002 Winston Woods:** This RAD PBV conversion includes 30 public housing units. Winston Woods is a family development and GDPM intends to complete any identified critical needs. The total project budget is approx. \$565K which includes appx \$300K initial deposit to the replacement reserve.
- **005000002 Wolf Creek:** This PBV RAD conversion includes 35 public housing units. Wolf Creek is a family development and GDPM intends to complete any identified critical needs. The total project budget is approx. \$506K which includes appx \$311K initial deposit to the replacement reserve.
- **005000004 Huffman Parnell:** Huffman Parnell is a 12 unit family public housing development that will convert to the RAD PBV Program. GDPM received a competitive award in the amount of \$1.2M in Ohio Housing and National Housing Trust Funds from the Ohio Housing Financing Agency. The total development budget is \$2.4M and includes appx \$1.8M in hard construction costs. GDPM intends to utilize the RAD Section 18 Blend whereby up to 60% of the units may convert to project based vouchers outside of the RAD Program.
- **005000005 Imperial:** This RAD conversion includes 12 public housing units. Imperial is a family development and GDPM intends to substantially rehabilitate the property. The total project budget is approx. \$1.7M which includes appx \$1.3M is hard construction costs. GDPM intends to utilize the RAD Section 18 Blend whereby up to 60% of the units may convert to project based vouchers outside of the RAD Program.
- **005000006 Wilkinson:** This RAD conversion could involve transfer of assistance, Section 18 Blend and the use of both RAD and non-RAD PBVs.
- **005000007 Desoto Bass:** This RAD conversion is a potential transfer of assistance. The subsidy from up to 50 units may transfer to GDPM's upcoming new construction tax credit development, Germantown Crossing. The total project costs amount to \$15.4M. GDPM may contribute up to \$600,000 to the development. This project may include several transfer of assistance RAD vouchers under the HUD Section 18 RAD Blend flexibility and may also include regular project based vouchers.

***GDPM 2023 RAD Closings – Bedroom Distribution***

Property	No. of Units	1-bdrm	2-bdrm	3-bdrm	4-bdrm
NEMC	126	3	79	42	2
Fitch-Hawthorn/Hawthorn Village	13		3	10	
Huffman-Parnell	12		12		
Imperial	12	7	5		
Winston Woods	30		15	15	
Wolf Creek	35		2	33	
<b>Total</b>	<b>228</b>	<b>10</b>	<b>116</b>	<b>100</b>	<b>2</b>

**005000006 Remaining Properties**

GDPM may pursue RAD conversions for the remaining AMP 6 properties (8 units). This may include joint applications for financing or 'straight' conversions utilizing little or no debt. GDPM may combine all or a portion of the remaining properties into one 4% or 9% LIHTC application. In order to supplement the RAD rents, GDPM intends to request from HUD that the maximum percentage of the units be disposed of under Section 18 of the U.S. Housing Act. The disposition will enable GDPM to project-base units outside of RAD. GDPM also intends to utilize HUD's de minimis disposition tool under RAD which allows an additional 5% of the units to be converted to the PBV program outside of RAD.

### **005000001 Triangle View, Short Helena, Riverside**

GDPM intends to submit a 4% tax credit application in order to fund the necessary substantial rehabilitation at the combined project of Triangle View, Short Helena, and Riverside. Additional funding sources may include AHP, bond gap financing, capital funds, HOME funds, etc. In, order to supplement the RAD rents, GDPM intends to request from HUD that the maximum percentage of the units be disposed of under Section 18 of the U.S. Housing Act. The disposition will enable GDPM to project-base units outside of RAD. GDPM also intends to utilize HUD's di minimis disposition tool under RAD which allows an additional 5% of the units to be converted to the PBV program outside of RAD.

### **RAD All Other AMPS**

In addition to the developments set-forth above, GDPM intends to submit RAD applications for its remaining portfolio. In 2023, GDPM may submit development specific RAD applications for the properties listed in Attachment #2. Additionally, GDPM may commit up to 100% of its Capital Fund (appx. \$6M per year) to support its RAD conversions. For RAD properties undergoing substantial rehabilitation at conversion, GDPM may seek approval of conversion to PBV under Section 18 for units using both di minimis and RAD Section 18 blending. GDPM may utilize other funding sources such as tax credits, Housing Development GAP Financing program funds, HOME funds, CDBG Funds, grant opportunities, the Federal Home Loan Bank Affordable Housing Program and other available sources.

### **RAD Transfer of Assistance Properties:**

In order to facilitate the financing, development, and preservation of decent, safe, and affordable the subsidy and/or assistance of current public housing units may be transferred from the converting property to a new property either thru new construction or acquisition. GDPM intends to seek transfer of assistance opportunities. GDPM's first RAD transfer of assistance projects include the transfer of assistance from the AMP 1 scattered sites to Brandt Meadows.

Where the transfer of assistance to a new site is approved, residents of the Converting Project will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete.

### **RAD CHAP Amendments**

GDPM may request to amend its RAD Portfolio CHAP and/or the individual RAD communities with active CHAPs in order to implement a multi-phase plan and to secure the most recent rents available.

### **Funding Sources**

To support its RAD conversions, GDPM may seek HUD approval (where required) to use the following funding sources to support its RAD conversions: Operating Fund, Capital Fund, TDF, and Hope VI, Turnkey /other homeownership funds, disposition proceeds, and non-federal sources.

**Other Conversion of Public Housing:** GDPM may explore the feasibility of voluntary and/or required conversion of public housing during the plan period. More specifically, GDPM may review, for eligibility and feasibility, voluntary conversion for Grand, Desoto Bass, Wentworth, Wilkinson, Westdale, Park Manor, Metropolitan, Mount Crest, Hilltop Homes, Wilmington, and any development listed in Attachment #2. If, after its analysis, GDPM determines that it is more efficient to operate the units under the HCV/PBV program, it may convert the units. GDPM will seek tenant protection vouchers and the buildings will be converted to the PBV program.

### **Project Based Vouchers (PBV) and Tenant Based Voucher:**

- In partnership with local Continuum of Care, GDPM committed support to the Montgomery County 10 Year Plan to End Homelessness and set aside 250 Housing Choice Vouchers for eligible, homeless, project based housing projects within Montgomery. GDPM has distributed approximately 140 vouchers towards this commitment.
- GDPM may select additional PBV developments for award, so long as the amount of PBV awarded does not reach the 20% (up to 30% in certain circumstances) of GDPM's annual voucher authority.



- GDPM may award PBVs based on prior competitive awards and may publish an RFP for projects that wish to utilize PBVs.
- GDPM may seek an award of HCV or PBV special purpose vouchers, if made available by HUD. GDPM will assess the local community's housing needs and priorities when determining whether to seek an award and may seek up to the total maximum amount of award for which is may be eligible.
- GDPM may award vouchers for replacement of it public housing units subject to disposition, RAD, voluntary conversion, and/or a RAD/Section 18 Blend. If a property undergoes substantial rehabilitation and the cost exceeds 60% of the current year HUD published HCC, the development may be eligible for Section 18 disposition. Up to 5% of units within each RAD development may be eligible for the di minimis exception to Section 18 in order to facilitate conversion under the regular PBV program.

#### **HUD – VASH Vouchers**

The HUD-Veterans Affairs Supportive Housing (HUD-VASH) program combines Housing Choice Voucher (HCV) or PBV rental assistance for homeless Veterans with case management and clinical services provided by the Department of Veterans Affairs (VA). VA provides these services for participating Veterans at VA medical centers (VAMCs) and community-based outreach clinics. If authorized by HUD and deemed necessary by the community, GDPM may seek proposals for a project-based voucher development to assist United States Veterans through the HUD-VASH program. GDPM may also seek to increase its number of tenant-based VASH vouchers, if needed. GDPM may award VASH vouchers for a single project or multiple projects and will administer and/or award any additional VASH vouchers provided by HUD. When selecting proposals for VASH PBV awards, GDPM will follow its PBV project selection criteria as set forth in its Administrative Plan and any HUD required program selection criteria.

**Tenant Protection Vouchers:** GDPM may seek Replacement and/or Relocation Tenant Protection Vouchers for tenants displaced as a result of a GDPM-related development project including relocation associated with a RAD conversion, demolition, disposition, and/or voluntary conversion.

**Family Unification Program Vouchers:** GDPM may expand its eligible use of FUP vouchers to include persons aging of out foster care. It may execute an MOU with a local referral agency in order to continue its implementation of the Program. Any current FUP voucher holders that no longer fit the original criteria for a receipt of an FUP voucher may be provided with a regular Housing Choice Voucher in order to expand opportunities for families in need of an FUP voucher.

**Other Available HUD Vouchers** as HUD makes vouchers or NOFA available, GDPM will evaluate all opportunities to expand its voucher offerings for the advancement of affordable housing in Montgomery County.

**DESIGNATED HOUSING FOR ELDERLY AND/OR DISABLED FAMILIES:** In accordance with 24 CFR part 945 and HUD Notice PIH 2005-02, GDPM may designate the following public housing properties for occupancy by elderly families only:

- Wilmington, 958 Wilmington, Dayton; (OH005000004)
- Park Manor, 220 Park Manor. (OH005000005)

If the properties are converted under RAD, GDPM may implement an elderly preference for admission in lieu of designation for the developments listed above.

#### **OCCUPANCY BY OVER-INCOME FAMILIES**

In accordance with the Housing Opportunities Through Modernization Act of 2016, GDPM will annually create a report that demonstrates the amount of GDPM public housing households whose income exceeds 120% AMI. The report will also include information on the amount of families on GDPM waitlists. The report will be submitted to HUD and available to the public. Through the FY2023 Annual Planning process, GDPM is amending its ACOP to include a revised Over-Income Policy (please see attachment # 4)

## **OCCUPANCY BY POLICE OFFICERS**

Currently there are no units occupied by law enforcement officers.

**UNITS WITH APPROVED VACANCIES FOR MODERNIZATION:** In accordance with 24 CFR 990.145, GDPM routinely seeks approval from the HUD field office to place units undergoing modernization and/or casualty loss in to vacancy status until the work is complete. GDPM may utilize any HUD approved Vacancy category provided for in PIH 2022-03 *Guidance on Unit Designation Categories and Accessible Designation Categories in IMS/PIC*. GDPM will continue to work with the Cleveland Filed Office to continually place units into a HUD approved vacancy status.

**OTHER CAPITAL GRANT PROGRAMS:** GDPM intends to apply for additional HUD resources that may become available including but not limited to, Capital Fund Community Facilities Grants, and Emergency Safety and Security Grants.

## **OTHER ACTIVITIES**

- **Broadband Infrastructure:** In accordance with the HUD Final Broadband Rule, GDPM will implement a broadband infrastructure planning element into its new construction/substantial rehabilitation development program.
- GDPM administers a HCV homeownership program through its Family Self Sufficiency Department (FSS). In connection with a local Community Development Finance Institution, GDPM may seek to expand this program if Capital Magnet Fund or other resources are awarded to the CDFI.
- GDPM intends to evaluate new program/financial software to accommodate HUD program changes including RAD, re-federalization of the COCC, and tax credit projects.
- GDPM intends to evaluate conversion to an automated A/P system.
- GDPM intends to complete an agency-wide equipment/property inventory and valuation.
- GDPM may implement Small Area fair Market Rents (SAFMRs) for the all or a portion of GDPM's HCV jurisdiction. It will analyze the effectiveness of SAFMRs on providing expanded housing choices to its HCV participants.
- GDPM intends to review the HUD Moving-to-Work (MTW) program. If beneficial to GDPM, GDPM may submit an application to participate in any MTW expansion opportunities. GDPM will focus on streamlining operations, promoting self-sufficiency and providing expanded housing choice when reviewing MTW strategies.
- GDPM intends to implement an electronic based application process for its public housing program.
- GDPM may utilize force account labor for work activities identified in this plan and accompanying attachments. The workforce may be permanent or temporary, external or internal. The materials and equipment may be purchased by
- GDPM to undertake certain activities identified in the PHA Plan (and attachments). In such cases, GDPM will act as its own general contractor.

## **B.3 PROGRESS REPORT**

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

The mission of Greater Dayton Premier Management is "to develop housing solutions for individuals, seniors and families. We seek to improve neighborhoods by offering diverse housing options. We require that our families, employees and partners demonstrate responsible character, which strengthens the economic health, vitality and humanity of the Miami Valley". In addition to various updates included above, the following progress has been made toward the agency's 2020-2025 Agency Plan:

## **PRESERVE GDPM'S PORTFOLIO AND ADDRESS CAPITAL NEEDS OBJECTIVES PROGRESS:**

1. Utilize available HUD programs and resources such as Rental Assistance Demonstration (RAD), Voluntary Conversion, Section 18 Demolition and Disposition and Choice Neighborhoods, to advance goals of the redevelopment plan.
  - Converted 346 units through RAD to date
  - 228 units planned for conversion in 2023
  - Updating 36 units in the former AMP 1 Scattered Sites properties in order to provide relocation options to public housing tenants and tenants displaced during RAD conversions. In addition to providing relocation at the Scattered Sites, GDPM intends to accept tenant based vouchers.
2. Incorporate energy savings measures and green technologies to reduce utility bills and enhance living environments
  - Underway

## **GOAL: EXPAND THE SUPPLY OF AFFORDABLE HOUSING OBJECTIVES PROGRESS:**

1. Apply for additional Housing Choice Vouchers (HCV), where appropriate
  - Received authorization for 44 tenant protection vouchers for tenants being displaced as part of Western Manor contract loss
  - Will continue to seek opportunities
2. Acquire and/or build developments to expand GDPM's portfolio offerings
  - Acquired Dayton View Commons and Senior Village which added 80 units to GDPM's portfolio
  - Received 9% Tax Credit Award for the development of Germantown Crossing; a 50 unit family development.
  - Submitted 9% Tax Credit application for Renew Miami Chapel Phase 1. This will replace up to 50 Desoto Bass units with newly constructed units on site.
  - Updating 36 units in the former AMP 1 Scattered Sites properties in order to provide relocation options to public housing tenants and tenants displaced during RAD conversions. In addition to providing relocation at the Scattered Sites, GDPM intends to accept tenant based vouchers.
3. Encourage assisted units in private developments throughout Montgomery County
  - Participate in planning for the Fairgrounds housing development
  - Executed HAP Contract for a PBV Unit at the Wolf Creek Homes development.
4. Seek partnerships in order to create leverage opportunities for additional housing options
  - Partnering with Citywide Development and the City of Dayton to apply for 5/3 Neighborhood Investment program

- Expanded development partnerships by adding 2 additional development partners for a total of 4.
- Participate in Community Land Trust committee to create an additional tool to advance and preserve affordable housing
- A partnership with Amazon is pending.

#### **CREATE ACCESS TO AFFORDABLE HOUSING IN AREAS OF OPPORTUNITY & PROMOTE DECONCENTRATION OBJECTIVES PROGRESS:**

1. Conduct outreach efforts to potential HCV landlords
  - Conducted advertisements to increase landlord participation
    - Wrapped two agency vans for mobile advertising
    - Radio advertisements
    - Purchased 15 billboards across Montgomery County
    - Purchased 200 Regional Transportation Authority (RTA) bus inserts to be displayed in buses across Montgomery County
2. Seek to acquire land or buildings for development in identified areas of opportunity per the Kirwan Opportunity Maps
  - Hired real estate agent to assist with identifying opportunities
3. Encourage assisted units in private developments throughout Montgomery County
  - Participate in planning for the Fairgrounds housing development
  - Executed HAP Contract for a PBV Unit at the Wolf Creek Homes development.
4. Evaluate methods to promote Public Housing deconcentration and income mixing in developments with average family incomes outside the upper or lower Established Income Range (EIR) as defined in 24 CFR 903.2(c)(1)(iii) (e.g., bringing higher income public housing households into lower income public housing developments)
  - Using income averaging in all LIHTC projects
  - Seeking transfer of assistance opportunities through RAD in an effort to deconcentrate
5. Encourage homeownership opportunities through the Family Self-Sufficiency program
  - 26 active homeowners building equity via HCV homeownership program
  - Implemented pilot IDA program. IDA enables low-income families to save money for home ownership, post-secondary education and small business ownership.
  - Held homeownership information sessions for GDPM residents at the Dayton Metro Library

#### **ENHANCE MANAGEMENT STAFF CAPACITY IN MANAGING VARIOUS TYPES OF AFFORDABLE HOUSING OBJECTIVES PROGRESS:**



1. Participate and host various trainings and webinars applicable to RAD, tax credit management/compliance, in addition to compliance related trainings for other affordable housing unit types. A sample of trainings completed:
  - Ohio Housing Authority Training
  - Procurement Training
  - Capital Fund
  - American Bar Association
  - Lead Based Paint
  - Yardi Voyager
  - Various webinars regarding RAD, demolition, disposition strategies
  - Ohio Capital Corporation maintenance trainings
  - Ohio Housing Conference
  - Agency-wide PIC training
  - Annual Fair Housing Training
2. Identify a qualified consultant(s) to assist with file set-up and internal compliance monitoring
  - Complete

**PROMOTE AND MARKET GDPM'S AFFORDABLE HOUSING PROGRAMS OBJECTIVES PROGRESS:**

1. Advertise through a variety of publications and media, such as traditional newspapers, radio advertisements, billboards, transit buses, social media, cable TV and coupon programs to ensure the community is aware of available affordable housing options and increase/maintain high occupancy rates.

**OUTCOMES:**

- Radio advertising after Memorial Day tornado for public housing
- 2 vans wrapped for GDPM advertising
- 15 Billboards
- 200 inserts for RTA buses
- Public Housing Referral Program
  - Resident receives \$100 for referring new tenant who signs lease/stays 60 days
  - Welcome bags including \$25 gift card for new residents

**COMPLETION OF UPDATED ITS SYSTEMS TO STREAMLINE OPERATIONS AND CREATE COST EFFICIENCIES PROGRESS:**

1. Complete infrastructure improvements to technology system
  - Upgraded office phones to Gigabit technology
  - Upgraded switches and routers to Cisco Meraki Gigabit Technology
  - Upgraded agency cabling infrastructure to CAT 6
  - Install Wi-Fi technology at Central Office

- Installed Help Desk support software
  - Continuous improvements as needed
2. Complete transition from Visual Homes to Yardi and utilize all enhanced reporting and module functions
- Migrated from Visual HOMES to Yardi
  - Installed Yardi's Rent Café Owners Portal
  - Installed Yardi's Rent Café Applicant Portal
  - Continuous improvement of efficiencies and addition of portals as needed
  - Utilizing Yardi Job Cost to track construction and capital projects

## **EXPAND THE NETWORK OF SELF-SUFFICIENCY AND LEADERSHIP SUPPORTS FOR RESIDENTS PROGRESS:**

1. Advocate on behalf of GDPM residents for services

## **OUTCOMES:**

- GDPM continued to maintain a high level of resident service goals in order to provide noteworthy client linkages.
- GDPM's FSS & ROSS programs are housed within GDPM's Community Initiatives Department the following was achieved in FY2022:
  - 25 Active MOUs with Community Partners
  - Managing 130 FSS participants
  - Enrolled 51 new participants
  - 26 Homeowners building equity via HCV Home ownership program
  - 6 new homeowners
  - 47 families enrolled to receive case management in addition to service coordination via ROSS service coordination grant
- GDPM launched an IDA (Individual Development Account) Program. This is a partnership between GDPM, the Ohio Community Development Corporation, and Wright-Patt Credit Union that gives participants the opportunity to receive up to \$4,000 towards homeownership, postsecondary education expenses, or business capitalization.
- The Digital Equity Initiative has maintained strong partnerships with CareSource and Cincinnati Bell. The partnership has offered free Wi-Fi to over 1,000 residents and ongoing digital literacy workshops.
- The Jobs Plus program opened its doors to DeSoto Bass Courts and Hilltop Homes residents in April 2017. To date, approximately 200 residents have become members and have opted in to receive services such as work readiness, jobs placement, educational advancement, financial literacy, and other services that addresses poverty. 140 of those residents are employed. GDPM received funds donated by Key Bank to implement a work experience program. The program was a partnership with the Dayton Urban League.
- Utilized Eviction Prevention/Rental Assistance resources to process 503 applications. 440 residents received rental assistance totaling \$757,209.77.
- Held a back to school event at Desoto Bass and distributed 500 book bags to GDPM families

- GDPM participated in West Dayton Strong – a three week summer camp at Desoto Base
- Community Health Fair held at multiple sites during Open Enrollment Period for GDPM families (Wilmington, Park Manor, Westdale, Dayton View, Grand, Windcliff, DeSoto Bass)
- GDPM participated in the Dayton Public Schools Summer Food Service Program which was administered at 5 family sites (DeSoto Bass, Mount Crest, Triangleview, Cornell Ridge, Riverview Terrace)

#### **B.4 STATEMENT OF CAPITAL IMPROVEMENTS**

See the first page of the most recent HUD Form-50075.2 approved by HUD on October 24, 2022 (Attachment #1a).

#### **B.5 MOST RECENT FISCAL YEAR AUDIT-** No issues

### **C. OTHER DOCUMENT AND/OR CERTIFICATION REQUIREMENTS.**

**C.1 RESIDENT ADVISORY BOARD COMMENTS** -No comments.

**C.2 CERTIFICATION BY STATE OR LOCAL OFFICIALS.** -Included

**C.3 CIVIL RIGHTS CERTIFICATION-** Included

**C.4 CHALLENGED ELEMENTS-** N/A

**C.5 TROUBLED PHA** No

### **D. Affirmatively Furthering Fair Housing (AFFH) -** N/A