

Virgin Islands Housing Authority
Semi-Autonomous Agency

TESTIMONY

36th Legislature of the U.S. Virgin Islands
Committee on Culture, Youth, Aging, Sports & Parks



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Introductions

Good Morning, Honorable Senator Angel L. Bolques, Jr., Chairman of the Committee on Culture, Youth, Aging, Sports & Parks; Honorable Senator Carla J. Joseph, Vice-Chairwoman; and distinguished Committee Members: Senators Avery L. Lewis, Marvin A. Blyden, Novelle E. Francis, Jr., Alma Francis-Heyliger, and Franklin D. Johnson. Good morning to the other Senators present, legislative staff, Virgin Islands residents, and all who are listening and viewing.

My name is Dwayne Alexander, Executive Director of the Virgin Islands Housing Authority (VIHA). I am accompanied today by Mrs. Akala Anthony, Director of the Housing Choice Voucher Program. Together with our executive leadership team, we are responsible for ensuring that VIHA fulfills its federal and territorial obligations to provide safe, decent, and affordable housing to eligible households across the Territory.

As the Public Housing Agency (PHA) for the U.S. Virgin Islands, VIHA is responsible for administering the Housing Choice Voucher Program (HCVP) in accordance with HUD rules and regulations governing eligibility determinations, waiting list administration, Housing Assistance Payments (HAP), rent-reasonableness determinations, HQS inspection oversight, and full compliance with non-discrimination and fair housing requirements. VIHA also carries a critical responsibility for ensuring equitable housing access for persons 62 years of age and older, under HUD definitions including ensuring proper eligibility verification, fair treatment, and access to elderly-designated housing opportunities.

Additionally, although HUD has not formally designated certain LIPH communities as elderly only under its designation rule, the Virgin Islands Housing Authority recognizes that several sites have long served as traditional senior communities due to their historical resident composition and strong identification by the public as senior housing. These communities include: the Oswald Harris Court Senior Section on St. Thomas (14 units), the Lucinda Millin Home on St. Thomas (85 units), the Wilford Pedro Homes on St. Croix (98 units), and the Joseph E. James Terrace on St. Croix (34 units).

The Virgin Islands Housing Authority recognizes that seniors particularly those living on fixed incomes face unique and growing challenges in securing safe, decent, and affordable housing. As the administering agency for the Housing Choice Voucher Program (HCVP) and operator of multiple elderly designated Project-Based Voucher (PBV) communities, VIHA plays a central role in ensuring that older adults have fair and equitable access to long-term housing stability.

Today, more than 760 elderly applicants (age 60+) remain on the tenant-based HCV waiting lists across both districts, with average wait times ranging from one to two years, reflecting the increasing demand among older residents seeking rental assistance. Seniors face rising market rents, limited availability of accessible units, and competition from short-term and seasonal rentals making HCV a vital lifeline for maintaining independence.

VIHA also administers two senior designated PBV communities Celestino A. White Senior Residence on St. Thomas and Louis E. Brown II Senior Housing on St. Croix. These

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developments operate at full occupancy, maintain long waiting lists, and provide environments tailored to aging in place through ADA-informed design, supportive management, and proximity to key services.

System-coded removals show that elderly applicants encounter challenges such as incomplete documentation, returned mail, or delayed responses to required updates. These trends highlight the importance of sustained outreach and targeted support as seniors navigate federally required application processes.

VIHA applies HUD's 40% initial rent burden protection, ensuring seniors with limited incomes are not approved for units that would be unaffordable at move-in. VIHA also works closely with the Department of Human Services, hospitals, and community organizations to support seniors transitioning out of institutional settings and prevent housing insecurity.

As the Territory's senior population grows, VIHA remains committed to expanding elderly housing opportunities, strengthening inter-agency coordination, improving waiting list processes, and ensuring that older adults across the Virgin Islands can age with dignity, safety, and stability.

FY 2025 Funding Environment and Impact on Elderly Access

During Fiscal Year 2025, VIHA operated under HUD's FFY 2025 HCV Funding Implementation Notice (PIH 2025-13), which required PHAs to restrict leasing to remain within available Budget Authority and prevent Housing Assistance Payment (HAP) shortfalls. In response, VIHA paused new admissions from the tenant-based HCV waiting list for the duration of the fiscal year.

This pause applied uniformly to all households, including elderly applicants, and ensured compliance with federal directives designed to protect program stability for the 1,300 families actively receiving rental assistance. HUD's 2025 Renewal Funding Inflation Factors (RFIFs) reflected rising unit costs that further required conservative leasing practices.

HUD Definitions of Elderly Households

Under federal regulations governing all Public Housing Agencies (PHAs), HUD establishes uniform national definitions that determine eligibility, program categorization, and the application of elderly related housing policies. HUD defines an "elderly person" as an individual who is 62 years of age or older, as set forth in HUD federal housing regulations, and an "elderly family" as a household in which the head of household, co-head, spouse, or sole member is at least 62 years old. These definitions are critical because they govern how PHAs must administer program eligibility, waiting list assignments, admissions priorities permitted under law, and occupancy standards for elderly designated developments. They also control access to HUD regulated elderly housing, determine whether a household qualifies for certain supportive services, and dictate eligibility for elderly restricted Project-Based Voucher (PBV) communities.

Although VIHA must strictly apply HUD's 62 and older standard when determining eligibility, placement, and compliance actions, the Authority also tracks applicants age 60 and above for planning, outreach, and data analysis purposes. Monitoring near elderly individuals allows VIHA to anticipate demand, identify emerging needs, and ensure effective coordination with the Department of Human Services and other aging-services partners. However, it is HUD's 62+ definition not VIHA's planning metric that governs eligibility determinations, fair housing compliance, and all regulatory decisions related to elderly households within the Housing Choice Voucher Program and senior-designated PBV developments. These data points demonstrate not only the level of need among senior households but also the operational pressures that PHAs must manage when federal funding constraints impact the ability to serve elderly families in a timely manner.

Elderly Applicants on VIHA's HCV Waiting Lists

As of March 2026, VIHA's Housing Choice Voucher waiting list data demonstrate a continued and significant demand for affordable housing among older residents across the Territory. In the St. Thomas/St. John District, 384 applicants age 60 and older remain on the waiting list, with an average wait time of approximately two years, while the St. Croix District reflects 378 applicants age 60 and older, experiencing an average wait time of approximately two years. These wait times are influenced by limited voucher turnover, the Territory's constrained rental market, and the federally mandated pause on new tenant-based admissions during FY 2025.

The importance of this information lies in its direct relationship to HUD rules governing Public Housing Agencies (PHAs). Waiting-list demand and wait-time metrics are essential indicators of whether a PHA is aligning its administrative practices with federal requirements, which regulate waiting list management, non-discriminatory access, and equitable treatment of elderly households.

Whether Elderly Status Provides a Waiting List Preference

HUD regulations strictly prohibit Public Housing Agencies from adopting age-based preferences within the tenant-based Housing Choice Voucher Program. Under HUD's federal Housing non-discrimination requirements, PHAs may not implement any policy or preference that has the purpose or effect of delaying, denying, or otherwise restricting access to housing based on age. As a result, elderly applicants do not receive a ranking preference on VIHA's tenant-based waiting list, and VIHA must administer the list in a manner that is neutral, consistent, and fully compliant with HUD's civil rights framework. This requirement is critical because improper preferences even if well-intentioned could constitute unlawful discrimination, jeopardize program compliance, and expose the agency to HUD findings or corrective actions.

Although age based preferences are prohibited in the tenant-based program, HUD does permit PHAs and property owners to maintain elderly restricted waiting lists for designated Project-Based Voucher (PBV) developments, where the housing is specifically approved for elderly occupancy under federal designation rules. VIHA therefore maintains

elderly-restricted PBV waiting lists at its senior communities, such as Celestino A. White Senior Residence and Louis E. Brown II, consistent with the governing HUD regulations that allow elderly-only occupancy in certain project types. Understanding these distinctions is important because it ensures that VIHA applies preferences only where legally authorized, avoids discriminatory practices, and administers all programs in accordance with HUD's national standards for fairness, equal access, and civil rights compliance.

VIHA Senior-Designated PBV Developments

VIHA administers two HUD designated elderly Project-Based Voucher (PBV) communities that serve as critical affordable housing anchors for seniors across the Territory. On St. Thomas, the Celestino A. White Senior Residence (Sugar Estate) consists of 79 units, including 75 one-bedroom and 4 two-bedroom apartments, and currently maintains 69 elderly households on its waiting list. On St. Croix, the Louis E. Brown II Senior Housing Community provides 30 units, comprising 26 one-bedroom and 4 two-bedroom apartments, with 65 elderly households on the waiting list. Both developments operate at full occupancy and remain among the most essential senior housing resources available in the Virgin Islands.

The importance of these developments extends beyond unit counts; they play a central role in how VIHA fulfills its obligations under HUD regulations governing elderly occupancy. Because these communities are formally designated for seniors under federal rules, VIHA must apply HUD's definitions of elderly households, maintain elderly restricted waiting lists, and ensure eligibility determinations are conducted in compliance with HUD regulations. These properties enable VIHA to provide age appropriate, accessible, and supportive housing environments that align with HUD's national goals for aging in place, reduce the risk of homelessness among older adults, and help ensure that seniors with fixed incomes are not displaced by rising private-market rental pressures. The demand reflected in the waiting lists underscores the ongoing need for expanded elderly housing capacity and reinforces the importance of these PBV communities as vital components of VIHA's service to the Territory's senior population.

Landlord Participation and Protections for Elderly Households

VIHA is not aware of any landlord who has declined to rent to an elderly voucher holder; however, HUD regulations require PHAs to take immediate and decisive action if such conduct were to occur. Under the federal civil rights and non-discrimination requirements, all owners participating in the Housing Choice Voucher Program must comply with federal protections that prohibit discrimination based on age and other protected characteristics. If VIHA identifies or receives a complaint alleging that a landlord declined to rent to a senior because of their age, the Authority may deny approval of an assisted tenancy or disapprove the owner in accordance with HUD regulations, which governs owner suitability and disqualification standards. Confirmed or serious violations must also be referred to HUD's Office of Fair Housing and Equal Opportunity (FHEO) for investigation and enforcement. Throughout this process, VIHA has a responsibility to assist the affected elderly household by helping them locate alternative rental units, preserving their voucher, and ensuring that the voucher term does not expire due to circumstances beyond the family's control.

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The importance of these requirements is significant: HUD entrusts PHAs with enforcing civil rights protections within the HCV program, and violations related to age discrimination can undermine fair housing access, jeopardize federal compliance, and directly harm vulnerable elderly households who often have limited alternative housing options. By maintaining clear enforcement protocols, monitoring owner behavior, and supporting seniors who experience potential discrimination, VIHA upholds its federal obligations and ensures that the HCV Program remains an equitable, non-discriminatory housing resource for older adults across the Territory.

Elderly Applicant Waiting List Removals (Past Two Years)

Over the past two years, the Virgin Islands Housing Authority (VIHA) has closely monitored elderly applicant removals from its Housing Choice Voucher (HCV) waiting lists and senior-designated Project-Based Voucher (PBV) sites, reflecting HUD's requirements for accurate recordkeeping, eligibility management, and non-discriminatory waiting list administration. In the St. Thomas/St. John District, a total of 83 elderly applicants were removed, primarily due to incomplete applications, lack of response to required notices, documentation deficiencies, and findings of over-income in accordance with HUD income eligibility rules. A smaller number of removals resulted from returned mail, voluntary withdrawals, or site-specific denials for PBV properties.

In the St. Croix District, 90 elderly applicants were removed over the same period. The largest categories included family size discrepancies, incomplete applications, and nonresponses to required updates, all of which are standard HUD regulated removal reasons. Additional removals occurred due to pending documentation, port-out absorption by another PHA, age ineligibility, and voluntary declines of assistance. These patterns reflect common challenges faced by elderly applicants navigating documentation and verification requirements, as well as HUD's strict rules for maintaining the accuracy and integrity of HCV waiting lists.

Beyond district level HCV lists, VIHA also tracks removals from its general senior-interest categories, which include individuals aged 60+ who expressed interest in senior housing but were not specifically applying to PBV elderly designated developments. In this category, 149 removals occurred, with the majority resulting from incomplete applications, under-age findings based on HUD's 62+ definition, and income ineligibility. These numbers highlight the importance of clear applicant communication, document readiness, and public understanding of HUD's elderly definitions.

For VIHA's formally designated senior PBV communities Sugar Estate Senior Residence on St. Thomas and Louis E. Brown II Senior Housing on St. Croix there were 159 elderly related removals during the same period. The most common reasons included incomplete applications, over-income determinations, underage findings per HUD definitions, and nonresponse to required follow-up notices. These removal categories reflect HUD's heightened eligibility and documentation requirements for elderly restricted PBV properties, where compliance safeguards are essential to maintaining fair access and ensuring units are correctly allocated to eligible seniors.

Across all elderly related waiting lists St. Thomas/St. John, St. Croix, general senior interest categories, and senior designated PBV properties VIHA recorded a combined total of 481 removals. This information is important because HUD requires PHAs to maintain accurate and up to date waiting lists, enforce eligibility requirements consistently, and ensure equal access without discrimination. Tracking these removals allows VIHA to monitor patterns, improve applicant communication, strengthen outreach to elderly households, and ensure compliance with HUD regulations governing waiting list administration, fair housing obligations, and senior eligibility verification.

HUD's 40% Initial Rent Burden Rule and Its Impact on Seniors

VIHA's review of rent calculations for elderly households confirms that no senior participating in the Housing Choice Voucher Program whether through tenant-based assistance or Project-Based Voucher (PBV) units is rent burdened or paying more than 30% of their monthly adjusted income toward rent. This outcome is largely the result of HUD's regulatory protections combined with VIHA's local policy decisions. HUD strictly prohibits PHAs from approving an initial lease if the family's share of rent would exceed 40 percent of the household's adjusted monthly income when the gross rent is above the applicable payment standard. This safeguard is especially important for elderly households who rely on fixed incomes, as it ensures affordability at move-in, prevents seniors from entering financially unsustainable tenancy arrangements, and upholds HUD's national consumer-protection standards for vulnerable populations.

In addition to applying HUD's 40% rent-burden test at lease-up, VIHA further strengthened protections for seniors by implementing a zero minimum rent policy in the HCV Program. This means that households with little or no income including many elderly families are not required to pay a minimum rent contribution, ensuring that no senior is forced into rent hardship while experiencing periods of income instability. While this policy increases the subsidy cost borne by the agency, it prevents rent burdens, supports housing stability, and aligns with VIHA's mission to protect the most vulnerable families, consistent with HUD's affordability framework. For elderly households with zero income, the 40% test does not apply; instead, HUD requires that such households lease units with gross rents at or below the payment standard, further ensuring that seniors are protected from unaffordable housing obligations.

Together, these federal protections and VIHA's local policy decisions ensure that the Housing Choice Voucher Program remains a stable, affordable, and non-discriminatory housing resource for seniors across the Territory. This information is important because it demonstrates VIHA's full compliance with HUD regulations, highlights the agency's proactive measures to prevent elderly rent burden, and reaffirms the integrity of VIHA's administration of federal housing assistance programs.

Coordination with DHS and Health Systems

When applicable, and always within the boundaries of HUD regulations, federal guidance, and VIHA's policies governing the Housing Choice Voucher Program, VIHA collaborates closely with a network of agencies and service providers to support elderly households experiencing housing instability or transitioning from institutional or medical settings. These partnerships include the Department of Human Services (DHS), local hospitals and discharge planning teams, skilled nursing and rehabilitation facilities, and a range of community based aging service providers. This coordination is essential because HUD requires PHAs to ensure non-discriminatory access, facilitate reasonable accommodations when appropriate, and take proactive steps to prevent homelessness among vulnerable populations, including seniors leaving care facilities. By working with these partners, VIHA helps elderly residents secure stable housing, avoid unsafe or inappropriate returns to the community, and access supportive services needed to maintain long-term independence. This collaborative approach ensures that senior households receive timely, integrated support consistent with HUD's expectations for PHAs and reinforces VIHA's commitment to safeguarding the health, safety, and dignity of older adults throughout the Territory.

Waiting List Administration Practices

VIHA maintains a first come, first served waiting list with a residency preference under HUD regulations governing local preferences when admitting families from the waiting list for the HCVP. This preference must be applied in a non-discriminatory manner and cannot be used to delay or deny admission to elderly households.

Path to Reopening Tenant-Based Admissions

As HUD finalizes FY 2026 funding and utilization guidance, VIHA will reassess leasing projections and prepare for the responsible resumption of tenant-based admissions. Updates will be provided to the Legislature once federal funding levels are confirmed.

Closing

In closing, the Virgin Islands Housing Authority remains steadfast in its commitment to ensuring that seniors across our Territory have equitable access to safe, decent, and affordable housing. As the Public Housing Agency for the U.S. Virgin Islands, VIHA embraces its responsibility to uphold HUD regulations, protect vulnerable households, and administer the Housing Choice Voucher Program and elderly designated Project-Based Voucher communities with integrity, transparency, and compassion.

The challenges faced by our senior population from fixed incomes and rising rental costs to shortages of accessible and affordable housing require coordinated, sustained action. VIHA will continue working closely with the Legislature, the Department of Human Services, hospitals and healthcare partners, skilled nursing facilities, community-based organizations, landlords, and service agencies who support elderly residents every day. We extend our sincere appreciation to these partners for their commitment, collaboration, and shared

dedication to ensuring that seniors in the Virgin Islands can age with dignity, safety, and stability.

We remain committed to responsible stewardship of federal resources, to fair and non-discriminatory program administration, and to advocating for policies that advance the health, safety, and independence of our senior residents. On behalf of the Virgin Islands Housing Authority, thank you for your continued partnership, your oversight, and your dedication to improving the quality of life for the elderly in our community. I respectfully stand ready to answer any questions the Committee may have.