

ANN ARBOR HOUSING COMMISSION

5-Year Plan FY 25 – FY 29 including July 1, 2025 – June 30, 2026 One Year Annual Plan And MTW Supplement Plan

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Ann Arbor Housing Commission 5-Year Plan FY 25 – FY 29 DRAFT

Definitions and Acronyms

Administrative Plan: The policies and procedures that the Housing Commission has adopted, based on HUD and local regulations, that govern voucher programs.

CAN: Community Action Network. A nonprofit service provider located at the Northside Community Center. The AAHC contracts with CAN to directly serve public housing residents at Hikone and Green Baxter Courts. CAN also received a ROSS grant to serve all public housing residents become self-sufficient.

CSTS: Community Support and Treatment Services. Formerly Community Mental Health. The AAHC contracts with CSTS to provide services to residents primarily at Miller and Baker.

FMR: Fair Market Rent. HUD determines the Fair Market Rent by doing a rental market study and uses the 40th percentile of rental rates by unit size from the previous 2 years (not including new units and subsidized units).

FSS: Family Self Sufficiency program. A HUD program that encourages communities to develop local strategies to help voucher families obtain employment that will lead to economic independence and self-sufficiency.

FUP: Family Unification Program. A program under which Housing Choice Vouchers (HCVs) are provided to two different populations: 1. Families for whom the lack of adequate housing is a primary factor and 2. Youths who have attained at least 18 years and not more than 24 years of age and who have left foster care or will leave foster care within 90 days.

FYI: Foster Youth Initiative. A program which Housing Choice Voucher (HCV) assistance available to Public Housing Agencies (PHAs) in partnership with Public Child Welfare Agencies (PCWAs) to provide housing assistance on behalf of: Youth at least 18 years and not more than 24 years of age (have not reached their 25th birthday) who left foster care or will leave foster care within 90 days.

HAP: Housing Assistance Payment. A HAP contract is executed between the AAHC and a private landlord that has signed a lease with a Section 8 tenant so that the AAHC can pay the landlord a rent subsidy.

HCV: Housing Choice Vouchers. Formerly known as Section 8 vouchers. These vouchers are tenant-based vouchers unless they are specially designated as project-based vouchers. Tenant vouchers are attached to the tenant and provide a rent subsidy at whatever qualified unit a tenant moves to. Project based vouchers are attached to the unit so that any qualified tenant who lives in that unit, receives a rent subsidy.

HQS: Housing Quality Standard. A unit must be inspected to make sure that it meets the HQS standard before a unit is approved for a tenant with a Voucher.

MS5: Is a special purpose voucher program. Mainstream vouchers assist non-elderly persons with disabilities.

MTW: Moving to Work is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families.

NED: Non-Elderly Disabled. Housing Choice Vouchers (HCVs) awarded under different special purpose voucher program types to serve Category 1 vouchers non-elderly persons or families with disabilities to access affordable housing on the private market.

PEACE: Peace Neighborhood Center. A nonprofit service provider located on North Maple Road. The AAHC contracts with Peace to directly serve public housing residents at Maple Meadows and North Maple Estates.

PIC: HUD's inventory management system that the AAHC must report to HUD the inventory, condition, and occupancy of the public housing units.

PHA: Public Housing Authority. i.e Ann Arbor Housing Commission

PHAS: Public Housing Assessment System. HUD uses 10 indicators (such as occupancy rate, and accounts receivable from tenants) to monitor and rate Public Housing Authorities across the nation for their public housing properties.

PNA: Physical Needs Assessment. Conducted by an outside contractor to provide a guide to the AAHC on the physical condition of the buildings, the life expectancy of building features such as the roof or boiler, as well as the replacement cost.

ROSS-SC: Resident Opportunity and Self Sufficiency Service Coordinators. This three-year HUD grant will support the AAHC's tenants to earn skills, find employment and become self-sufficient.

SEMAP: Section Eight Management Assessment Program. HUD uses 15 indicators (such as HQS inspections, occupancy rate, and rent reasonableness) to monitor and rate Public Housing Authorities across the nation for their voucher programs (previously Section 8).

VASH: Veterans Affairs Supportive Housing. The special purpose voucher program combines HUD's Housing Choice Voucher (HCV) rental assistance for homeless Veterans with case management and clinical services provided by the Department of Veterans Affairs (VA).

City of Ann Arbor Housing Commission				
TOTALS				
Location	Yr Built	# of Units	Addresses	
Baker Commons (RAD PBV)	1980	64	106 Packard	
Broadway Terrace (PBV)	1956	20	1504 - 1506 Broadway	
Garden Circle (Turnkey)	1971	1	2072 Garden Circle	
Green Baxter Court (RAD PBV)	1970	23	1701 - 1747 Green Road	
Hikone (RAD PBV)	1970	29	2702 - 2760 Hikone	
Hillside Manor (PBV)	1996	6	1020 - 1042 Pennsylvania	
Creekside (RAD PBV)	2021	32	3421 - 3429 Platt	
Mallett's Creek (PBV)	1996	6	2670 -2680 South Main St	
Maple Meadows (RAD PBV)	1970	29	800 - 890 South Maple	
Miller Manor (RAD PBV)	1971	106	727 Miller	
North Maple Estates (RAD PBV)	2016	42	657 - 741 North Maple	
North Maple Duplexes (PBV)	1998	4	743 - 749 North Maple	
Oakwood (PBV)	1969	3	3565 - 3685 Oakwood	
South Seventh (PBV)	1969	8	221 - 253 S. Seventh	
Upper Platt (Colonial Square)	1964	5	3681 -3689 Platt	
West Washington (PBV)	1969	2	805 - 807 W. Washington	
White/State/Henry (RAD PBV)	2021	32	1510 White, 1527 State, & 705 Henry	
Lurie Terrace (Senior Housing)	1964	136	600 W. Huron	
Siller Terrace	1962	16	1474-1484 Liberty, 1540-1582 Siller, & 528 Virginia	
Summation		564		

5-Year PHA Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
(for All PHAs)		

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. The Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

А.	PHA Informatio	n.				
A.1	PHA Name: ANN	ARBOR HOUSI	NG COMMISSION	РНА	Code: MI064	
	PHA Plan for Fiscal The Five-Year Perio PHA Plan Submissio	d of the Plan (i.e	. 2019-2023): 2025-2029	- Revised 5-Year Plan Submission		
	A PHA must identify and proposed PHA Pl reasonably obtain add submissions. At a min	the specific locati an are available fo itional informatio nimum, PHAs mu HAs are strongly o	on(s) where the proposed PHA I or inspection by the public. Add n on the PHA policies contained ist post PHA Plans, including up encouraged to post complete PHA	a, PHAs must have the elements lister Plan, PHA Plan Elements, and all info itionally, the PHA must provide info in the standard Annual Plan, but exc dates, at each Asset Management Pro A Plans on their official websites. Pl	ormation relevan rmation on how luded from their ject (AMP) and	tt to the public hearing the public may r streamlined main office or central
			R		Γ	
	PHA Consortia: (C	Theck box if subm	itting a Joint PHA Plan and com	plete table below.)		
	Participating PHA	s PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Unit	s in Each Program HCV
	Lead PHA:					

В.	Plan Elements. Required for <u>all</u> PHAs completing this form.
B.1	Mission. State the PHA's mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA's jurisdiction for the next five years. The Ann Arbor Housing Commission (AAHC) seeks to provide desirable housing and related supportive services primarily for extremely low-income to very low-income individuals and families on a transitional and/or permanent basis. AAHC partners with community supportive service providers to build healthy residential communities and promote an atmosphere of pride and responsibility.
B.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low- income, and extremely low-income families for the next five years. FY25-29: 1. Develop new affordable housing. 2. Increase the number of Project-based Vouchers in the City of Ann Arbor and Washtenaw County that have a strong economic base and public transportation, especially for homeless and special needs households. 3. Increase supportive housing for residents with complex needs spanning from homelessness, mental illness, substance abuse, and/or disabilities.
B.3	Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. AAHC has increased the number of assisted households through its project-based voucher from 487 to 603 units. In addition, AAHC has increased the HCV program allocation from 1655 to 1819. Lastly, AAHC has increased the number of supportive housing through the administration of EHV, MS5, VASH, and FUP special purpose voucher programs.
B.4	Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. AAHC partners with 4 local non-profits to provide a broad range of on-site services to tenants. In addition, offers support service to HCV participants including those impact by the justice system. We partner the local domestic violence shelter, Safe House.
C.	Other Document and/or Certification Requirements.
C.1	Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. AAHC defines significant amendment to mean a change in policy that redirects the Ann Arbor Housing Commission's course and/or revises its mission, goals, and objectives. Substantial deviation or modification is defined as a change to the AAHC's policies that reflect a directional shift from the published mission and policies included in the Annual Agency Plan, such as; changes to rent that could negatively impact tenants such as increasing the minimum rent or changes to admission policies or any change regarding disposition.
C.2	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the 5-Year PHA Plan?
	(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.3	Certification by State or Local Officials.
	Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.4	Required	Required Submission for HUD FO Review.		
	(a)	Did the public challenge any elements of the Plan?		
		Y N		
	(b)	If yes, include Challenged Elements.		
D.	Affirmati	ively Furthering Fair Housing (AFFH).		

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Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

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.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Encourage accessible affordable housing units near transit or other key services at activity centers through zoning changes. Support local units to implement zoning strategies to develop housing products in single family neighborhoods.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

To avoid duplicative administrative burden for publicly supported housing, coordinate rental inspection process between HUD, MSHDA, and local regulations.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Prioritize public subsidies/incentives for affordable housing developments in high opportunity markets. Encourage the use of publicly owned land in high opportunity markets for affordable housing or proceeds go toward affordable housing.

Instructions for Preparation of Form HUD-50075-5Y - 5-Year PHA Plan for All PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR § 903.4)

A.1 Include the full PHA Name, PHA Code, PHA Fiscal Year Beginning (MM/YYYY), Five-Year Period that the Plan covers, i.e. 2019-2023, PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. Plan Elements.

- **B.1 Mission.** State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. (24 CFR § 903.6(a)(1))
- **B.2** Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years. (24 CFR § 903.6(b)(1))
- B.3 Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. (24 CFR § 903.6(b)(2))
- B.4 Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR § 903.6(a)(3)).

C. Other Document and/or Certification Requirements.

C.1 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32, REV 2.

C.2 Resident Advisory Board (RAB) comments.

- (a) Did the public or RAB have comments?
- (b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR § 903.17(b), 24 CFR § 903.19)

C.3 Certification by State or Local Officials.

Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.4 Required Submission for HUD FO Review.

- Challenged Elements.
- (a) Did the public challenge any elements of the Plan?
- (b) If yes, include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing.

(Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D.; nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA. Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low-income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average 1.64 hours per year per response or 8.2 hours per response every five years, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Streamlined Annual
PHA Plan
(HCV Only PHAs)

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

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA <u>do not</u> need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

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 <u>both</u> the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) Housing Choice Voucher (HCV) Only PHA A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) Standard PHA A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and 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.

А.	PHA Information.				
A.1	PHA Name: ANN ARBOR HOUSING COMMISSION PHA Code: MI064 PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2025 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) 2027 PHA Plan Submission Type: Annual Submission Image: Contract (ACC) units at time of FY beginning, above) Image: Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) 2027 Image: Contract (ACC) units at time of FY beginning, above) Image: Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) 2027 Image: Contract (ACC) units at time of FY beginning, above) Image: Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) 2027 Image: Contract (ACC) units at time of FY beginning, above) Image: Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) 2027 Image: Contract (ACC) units at time of FY beginning, above) Image: Contract (ACC) units at time of FY beginning, above) Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. Additionally, the PHA must provide information on how the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA Plans, including updates, at th				
	Participating PHAs	PHA Code	Program(s) in the Consortia	OW) Program(s) not in the Consortia	No. of Units in Each Program
	Lead HA:				

B.	Plan Elements.
B.1	Revision of Existing PHA Plan Elements.
	a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?
	 Y N Statement of Housing Needs and Strategy for Addressing Housing Needs. Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. Financial Resources. Rent Determination. Operation and Management. Ø Operation and Management. Ø Informal Review and Hearing Procedures. Ø Homeownership Programs. Ø Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. Ø Substantial Deviation. Ø Significant Amendment/Modification. (b) If the PHA answered yes for any element, describe the revisions for each element(s):
B.2	New Activities. – Not Applicable
B.3	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan. See attached report
	Capital Improvements. – Not Applicable
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N N/A D D
~	(b) If yes, please describe:
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) have comments to the PHA Plan?Y N
	(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.2	Certification by State or Local Officials.
	Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.
	Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y N Image:

D.1 Affirmatively Furthering Fair Housing (AFFH).

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome 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.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Encourage accessible affordable housing units near transit or other key services at activity centers through zoning changes. Support local units to implement zoning strategies to develop housing products in single family neighborhoods.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

To avoid duplicative administrative burden for publicly supported housing, coordinate rental inspection process between HUD, MSHDA, and local regulations.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Prioritize public subsidies/incentives for affordable housing developments in high opportunity markets. Encourage the use of publicly owned land in high opportunity markets for affordable housing or proceeds go toward affordable housing.

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), Number of Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements. All PHAs must complete this section. (24 CFR §903.11(c)(3))

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

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

□ Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR 5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the yaces of various races and ethnic groups residing in the jurisdiction of the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR 5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR § 903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR \$903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR \$903.7(a)(2)(i))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. (24 CFR §903.7(b))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

Rent Determination. A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. (24 CFR §903.7(d))

Operation and Management. A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (<u>24 CFR §903.7(e)</u>).

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

Homeownership Programs. A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

 \Box Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA's partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA's partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) and under requirements for the Family Self-Sufficiency Program and others. Include the program's size (including required and actual size of the FSS program) and means of allocating assistance to households. (24 CFR §903.7(1)(i)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(1)(iii)).

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

- B.2 New Activities. This section refers to new capital activities which is not applicable for HCV-Only PHAs.
- **B.3** Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.11(c)(3), 24 CFR §903.7(r)(1))
- **B.4** Capital Improvements. This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs
- **B.5** Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements.

- C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
- C.2 Certification by State of Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed. Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).
- C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides 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 for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 6.02 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality

Explanatory Note to Public Reviewers of the Proposed Moving to Work Supplement Fillable Form

The Moving to Work (MTW) Supplement collects information about policies implemented by MTW expansion agencies. MTW agencies use it to communicate their plans with residents and community stakeholders through required public comment processes, and HUD uses the information collected to monitor and evaluate the MTW demonstration program. MTW agencies will submit the MTW Supplement to HUD annually, and amend as needed. HUD plans to make the MTW Supplement into a fillable form so as to reduce respondent burden and make the information collected more useful to HUD. When the MTW Supplement is available through the fillable form, it will include skip patterns¹ that prompt the user to populate only the sections relevant to what they are currently implementing. It will also include screening questions that will ask which waivers and associated activities they are currently implementing, plan to implement in the upcoming year, or will be discontinued in the submission year. The MTW Agency will be able to print the information from the MTW Supplement in a reader-friendly format in order to inform the public of its plans for the upcoming year. The purposes of the MTW Supplement are two-fold: it reports to HUD what is happening at the local level in a way that the Department can monitor and evaluate; and, more importantly, it informs the public about what the agency is planning and gives the public the ability to provide comment.

The MTW Supplement asks for information about each of the MTW Waivers and associated activities that are made possible by the MTW Operations Notice, Safe Harbor Waivers and Agency-Specific Waivers, and a few other types of information. MTW agencies will fill in information/data through a fillable form and the information collected will be stored in a database so that it can be analyzed by HUD. The approved forms will be posted to the MTW website for viewing by the public. For instance, it will be simple to find out how many MTW agencies and which MTW agencies are implementing each type of activity. It will also simplify reporting for the MTW agency since information will carry over year-to-year in the fillable form so that information that does not change from year to year will be pre-populated, thereby reducing respondent burden.

This document lists the sections of the MTW Supplement and then presents the proposed questions to be included in the MTW Supplement for MTW agencies to answer annually. Throughout the online version, there will be a dropdown menu option that makes it clear as to which activities an agency is permitted to do within the safe harbors of the MTW Operations Notice, Appendix I, MTW Waivers.

Sections of the MTW Supplement:

- A. PHA Information
- B. Narrative
- C. MTW Waivers and Associated MTW Activities
- D. Safe Harbor Waivers
- E. Agency-Specific Waivers
- F. Public Housing Operating Subsidy Grant Reporting
- G. MTW Statutory Requirements
- H. Public Comments
- I. Evaluations
- J. MTW Certifications of Compliance

Information to be Collected for MTW Activities

There are many MTW activities, subject to limitations as outlined in the MTW Operations Notice, that an MTW agency may implement. Each MTW agency will likely only engage in a subset of these MTW activities. The MTW Supplement will first ask MTW agencies to identify which MTW activities they are proposing to implement and which of those MTW activities they are already implementing. MTW agencies will subsequently be asked to provide information only about the MTW activities they are proposing to implement or are already implementing. This feature will reduce respondent burden. MTW waivers have associated MTW activities. MTW agencies are also able to combine MTW activities into their own initiatives.

MTW agencies will be asked for specific information about each MTW activity they are proposing to implement or are already implementing. There are six types of questions that could be asked about each MTW activity. The exact mix of questions will depend partly upon the MTW activity and partly upon the requirements for that MTW activity listed in the MTW Operations Notice. The six types of questions are:

- (1) Core—questions applicable to most MTW activities
- (2) Custom-questions specific to an individual MTW activity
- (3) Safe Harbor Waiver—questions asked when the MTW activity requires a Safe Harbor Waiver
- (4) Hardship Policy—questions asked when the MTW Operations Notice requires a hardship policy for the MTW activity
- (5) Impact Analysis—questions asked when the MTW Operations Notice requires an impact analysis for the MTW activity
- (6) Agency-Specific Waiver-questions asked when the MTW activity requires an Agency-Specific Waiver

¹ A skip pattern is a question or series of questions associated with a conditional response.

Questions

The questions are presented below by type, beginning with the core questions. In the final online version of the MTW Supplement, the relevant questions from each type will be asked together in relation to each MTW activity the MTW agency is proposing to implement or is already implementing. The final online version of the MTW Supplement will be set up to allow for different versions of the same MTW activity—for instance, a different minimum rent for the non-elderly/non-disabled than for the elderly/disabled. The final online version of the MTW Supplement will also be able to autofill items with information from previous years. This feature will reduce respondent burden.

Table 1, at the end of this document, lists the MTW activities and indicates which types of questions need to be asked about each one.

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MTW Supplement to the Annual PHA Plan

Purpose. The Moving to Work (MTW) Supplement to the Annual PHA Plan informs HUD, families served by the PHA, and members of the public, about the MTW Waivers and associated activities that the MTW agency seeks to implement in the coming Fiscal Year and updates the status of MTW activities that have been previously approved. It also provides information about Safe Harbor Waivers, Agency-Specific Waivers, compliance with MTW statutory requirements, and evaluations. The MTW Supplement does not replace the PHA Plan. MTW agencies must continue to submit the applicable PHA Plan. MTW agencies that are not required to submit annual PHA Plans under the Housing and Economic Recovery Act of 2008 (HERA) must submit the MTW Supplement annually, in addition to holding public hearings, obtaining board approval, and consulting with Resident Advisory Boards (RABs) and tenant associations, as applicable, on planned MTW activities.

Applicability. Form HUD-50075-MTW is to be completed annually by all MTW agencies brought onto the MTW Demonstration Program pursuant to Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute) or legacy MTW agencies² that chose to follow the requirements of the MTW Operations Notice.

Definitions. All terms used in this MTW Supplement are consistent with the definitions stated in the MTW Operations Notice, including:

- (1) Local, Non-Traditional Activities (LNT) Those MTW activities that use MTW funding flexibility outside of the Housing Choice Voucher (HCV) and public housing programs established in Sections 8 and 9 of the U.S. Housing Act of 1937.
- (2) Safe Harbors The additional parameters or requirements, beyond those specified in the MTW activity description itself found in the MTW Operations Notice, following each activity description, that the MTW agency must follow in implementing MTW activities.
- (3) Substantially the Same Requirement A statutory MTW requirement that MTW agencies must continue to assist substantially the same total number of eligible low-income families as would have been served absent the MTW demonstration.

А.	PHA Information.
A.1	PHA Name:
B.	Narrative.
B. 1	MTW Supplement Narrative.
	The narrative provides the MTW agency with an opportunity to explain to the public, including the families that it serves, its MTW plans for the fiscal year and its short and long-term goals.
	The MTW agency should provide a description of how it seeks to further the three MTW statutory objectives during the coming Fiscal Year. Those three MTW statutory objectives are: (1) to reduce cost and achieve greater cost effectiveness in federal expenditures; (2) to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and (3) to increase housing choices for low-income families.

² Legacy MTW Agencies are agencies that were designated as MTW as of December 15, 2015

C.	MTW Waivers and Associated Activities.				
	NOTE: MTW agencies are reminded that all MTW Waivers and associated activities must be implemented in accordance with the MTW Operations Notice and within its safe harbors unless a Safe Harbor or Agency-Specific Waiver approval is provided by HUD, in which case, the activity utilizing the Safe Harbor or Agency-Specific Waiver must be implemented in accordance with the terms of the approval.				
	For all MTW Waivers and Activities in Section C, the screening question listed below will be presented in the fillable form. This will allow the form to only display those waivers that input where is required.				
Screener	 Each waiver and activity will be listed with the following choices. If "Not Currently Implemented" is selected, the agency will not be shown any further questions for the activity. Currently Implementing Plan to Implement in the Submission Year Will be Discontinued in the Submission Year Was Discontinued in a previous Submission Year Not Currently Implemented 				
Core Questions	The following core questions apply to all of the MTW Waivers and associated activities listed in the MTW Operations Notice. The core questions collect basic information about any MTW activity proposed or implemented by MTW agencies.				
Text		Input options and instructions			
goal(s	tive. Describe the MTW activity, the MTW agency's) for the MTW activity, and, if applicable, how the MTW y contributes to a larger initiative.	Text box [Note: If an MTW agency has the same MTW activity in both its public housing and HCV programs, it receives instructions to just write one narrative explaining that it covers both programs.]			
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?		(Check at least one) Cost effectiveness Self-sufficiency Housing choice			
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.		(Check at least one) Neutral (no cost implications) Increased revenue Decreased revenue Increased expenditures Decreased expenditures			
the M'	The set of a subset of a subset of assisted households of a subset of assisted households of a subset of assisted households?	The MTW activity applies to all assisted households The MTW activity applies only to a subset or subsets of assisted households			
		If the agency selects "The MTW activity applies only to a subset or subsets of assisted households" then the agency will receive the following three questions:			
admiss	chold Status. Does the MTW activity apply only to new sions, only to currently assisted households, or to both new sions and currently assisted households?	(Check one) New admissions (i.e., applicants) only Currently assisted households only New admissions and currently assisted households			

Text	Input options and instructions
Family Types. Does the MTW activity apply to all family types or only to selected family types?	 The MTW activity applies to all family types The MTW activity applies only to selected family types If the agency selects "The MTW activity applies to all family types" it does not get any further questions about family types. If the agency selects "The MTW activity applies only to selected family types" it is presented the following question and options: Please select the family types subject to this MTW activity: Non-elderly, non-disabled families
	Elderly families Disabled families (to the extent those families are not exempt via a reasonable accommodation) Other – another specifically defined target population or populations. Please describe this target population in the text box. [Text box]
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.For PH activities: Does the MTW activity apply to all public housing developments?	 For PH activities: The MTW activity applies to all developments The MTW activity applies to specific developments If the agency selects "The MTW activity applies to specific developments" then it is presented the follow up question: Which developments participate in the MTW activity? [agencies choose the applicable development number(s) from a list of their
For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	 public housing developments] For HCV activities: The MTW activity applies to all tenant-based units The MTW activity applies to all properties with project-based vouchers The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers If the agency selects "The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers" then it is presented the follow up question:
	Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. [Text box]
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? NO	Yes/No [If Yes]: What is the status of the Safe Harbor Waiver request? The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D). The waiver was previously approved. [If checked]: Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity. [Text box]
Does this MTW activity require a hardship policy? NO	Yes/No/Already provided [If Yes]: Upload Hardship Policy [If No, skip below Hardship Policy questions] [If Already provided, the agency has already provided the Hardship Policy under another activity and indicated that the policy is also applicable to this activity.]
Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)	Yes/No [If yes, a list will be presented to select the applicable MTW activities]

Text	Input options and instructions
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? NO	Yes/No [If Yes, then a further question pops up.]: What considerations led the MTW agency to modify the hardship policy? [Text box]
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?	0 [Numerical entry only] [if number > 0, further questions pop up]: 0 How many hardship requests were approved? [Numerical entry only] 0 How many hardship requests were denied? [Numerical entry only] 0 How many hardship requests were denied? [Numerical entry only] 0 How many hardship requests were denied? [Numerical entry only] 0 How many are pending? [numerical entry only]
Does the MTW activity require an impact analysis?	Yes/No/Already provided [If Yes]: Upload Impact Analysis
YES	[If No, skip the below Impact Analysis questions] [If Already provided, the agency has already provided the impact analysis under another activity and indicated that the policy is also applicable to this activity.]
Does the impact analysis apply to more than this MTW activity?	Yes/No
If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)	[If yes, a list will be presented to select the applicable MTW activities]
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.	[Text box]
Please provide an explanation as to why the activity was discontinued or will be discontinued.	[Will only apply if "Will be Discontinued in the Submission Year" or "Was Discontinued in a previous Submission Year" is selected in the screener.] [Text box]

Custom questions are tailored to each MTW activity. In what follows, the MTW activities are listed with their custom questions. The final online version of the MTW Supplement will be set up so that if an MTW activity is the same in the HCV and/or public housing programs, the MTW agency fills in the information for public housing, then the information is auto populated for the HCV program. MTW agencies are asked to fill in answers only to questions that are relevant to the MTW activities they propose to implement or are already implementing.

C.1 Tenant Rent Policies	
1.a., 1.b Tiered Rent (PH & HCV)	Input options and instructions
Please describe how the income bands are structured.	[Text box]
Please upload the tiered rent policy table that shows the income bands.	[Upload document]
What is the income basis for assigning households to income bands? NOT CURRENTLY IMPLEMENTED	This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs) This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) 1.r. and/or 1.s. "elimination of deductions" 1.t. and/or 1.u. "standard deductions" 1.v. and/or 1.w "alternative inclusions and exclusions"
1.c., 1.d Stepped Rent (PH & HCV)	Input options and instructions
Describe how the stepped rent is structured, including the	Description [Text box]
following: how each household's rent will be set in the first year;	Stepped rent schedule [Upload document]
how frequently rents will change and by what amount; and how	
the stepped rent will end (i.e., what is the maximum rent). Please	

	*
1.c., 1.d Stepped Rent (PH & HCV)	Input options and instructions
upload a document that presents the stepped rent schedule in the form of a table.	
If a household progresses all the way through the stepped rent schedule, what will their status be? NOT CURRENTLY IMPLEMENTED	 They will no longer receive a subsidy They will continue to receive a shallow subsidy Other\Not Applicable. [If checked]: Please explain [Text box]
1.e., 1.f Minimum Rent (PH & HCV)	Input options and instructions
How much is the minimum rent or minimum Total Tenant Payment (TTP)?	\$_50.00 [Note: If the MTW agency indicates they have a minimum rent that applies only to particular subgroups, as determined by responses to core questions, the question gets asked for each subgroup.]
1.g., 1.h Tenant Payment as a Modified Percentage of Income (PH & HCV)	Input options and instructions
What percentage of income will equal the Total Tenant Payment (TTP)?	<u>30</u> %
What is the income basis for calculating Total Tenant Payment?	 This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs) This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) 1.r. and/or 1.s. "elimination of deductions" 1.t. and/or 1.u. "standard deductions" 1.v. and/or 1.w "alternative inclusions and exclusions"
1.i., 1.j Alternative Utility Allowance (PH & HCV)	Input options and instructions
Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.	[Text box] NOT CURRENTLY IMPLEMENTED
1.k., 1.l Fixed Rents/Subsidy (PH & HCV)	Input options and instructions
Describe the method used to establish the fixed rents.	[Text box] NOT CURRENTLY IMPLEMENTED
How many households are currently subject to this policy?	[Text box]

 Table 1.k.1, 1.l.1 - What is the fixed rent/subsidy for each of the following unit sizes?
 NOT CURRENTLY IMPLEMENTED

Unit Size	Rent Amount -	Subsidy Amount –
	PH	HCV
Studio/Efficiency	\$	\$
One-bedroom	\$	\$
Two-bedroom	\$	\$
Three-bedroom	\$	\$
Four or more	\$	\$
bedrooms		

1.m., 1.n Utility Reimbursements (PH & HCV)	[No custom questions for this activity.]
1.o Initial Rent Burden (HCV)	Input options and instructions
If the MTW agency plans to implement a new maximum income- based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?	% NOT CURRENTLY IMPLEMENTED
1.p., 1.q Imputed Income (PH & HCV)	Input options and instructions
Does the imputed income policy assume a set number of hours worked per individual or per household?	(Check one) Per individual Per household NOT CURRENTLY IMPLEMENTED
How many hours per week are assumed?	[Number entries between 0 and 15 or 0 and 30, as appropriate, allowed]
What is the assumed wage rate?	[Must be a number less than or equal to the federal minimum wage]

1.p., 1.q Imputed Income (PH & HCV)	Input options and instructions
How many households are currently subject to this policy?	[number]
1.r., 1.s Elimination of Deduction(s) (PH & HCV)	Input options and instructions
Which deduction(s) will be eliminated, modified, or added?	(Check all that apply) Dependent allowance
NOT CURRENTLY IMPLEMENTED	Unreimbursed childcare costs Other (please explain)
1.t., 1.u Standard Deductions (PH & HCV)	Input options and instructions
	input options and instructions
How much will the single standard deduction be in the Fiscal Year?	NOT CURRENTLY IMPLEMENTED
How much will the single standard deduction be in the Fiscal	S

C.2 Payment Standards and Rent Reasonableness	
2.a Payment Standards – Small Area Fair Market Rents (FMR) (HCV)	Input options and instructions
Please explain the payment standards by ZIP code or "grouped" ZIP codes.	[Text box] GROUPED ZIP CODES
2.b Payment Standards – Fair Market Rents (HCV)	Input options and instructions
Please explain the payment standards by FMR.	[Text box] 120% OF FMR
2.c Rent Reasonableness – Process (HCV)	
Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method.	[Text box] NOT CURRENTLY IMPLEMENTED
2.d Rent Reasonableness – Third-Party Requirement (HCV)	Input options and instructions
Please explain or upload a description of the quality assurance method.	[Text box] and [Upload file] options
Please explain or upload a description of the rent reasonableness determination method.	[Text box] and [Upload file] options

C.3 Reexaminations

3.a., 3.b Alternative Reexamination Schedule for Households (PH & HCV)	Input options and instructions
What is the recertification schedule?	(Check one) Once every two years
NOT CURRENTLY IMPLEMENTED	Once every three years Other [If checked]: Please describe. [Text box]
How many interim recertifications per year may a household	
request?	$\frac{1}{2}$ or more
Please describe briefly how the MTW agency plans to address	[Text box]
changes in family/household circumstances under the alternative reexamination schedule.	
3.c., 3.d Self-Certification of Assets (PH & HCV)	Input options and instructions
Please state the dollar threshold for the self-certification of assets.	\$NOT CURRENTLY IMPLEMENTED

C.4 Landlord Leasing Incentives 4.a., 4.b., 4.c. - Vacancy Loss, Damage Claims, and Other **Input options and instructions** Landlord Incentives (HCV) (The same custom questions are asked for each of these activities.) Does this policy apply to certain types of units or to all units all To all units [No follow-up questions] HCV units or only certain types of units (for example, accessible Certain types of units only [if checked, there are follow up units, units in a low-poverty neighborhood, or units/landlords new questions]: to the HCV program? What types of units does this policy apply to? Accessible units Units in particular types of areas or neighborhoods [if checked]: Please describe these areas briefly: [Text box] Units/landlords new to the HCV program Other [if checked]: Please describe briefly [Text box] What is the maximum payment that can be made to a landlord [Text box] NO MORE THAN ONE MONTH CONTRACT RENT under this policy? How many payments were issued under this policy in the most [number of payments] recently completed PHA fiscal year? What is the total dollar value of payments issued under this policy \$ in the most recently completed PHA fiscal year?

C.5 Housing Quality Standards (HQS) 5.a. - Pre-Qualifying Unit Inspections (HCV) Input options and instructions How long is the pre-inspection valid for? [number of days] NOT CURRENTLY IMPLEMENTED 5.b. - Reasonable Penalty Payments for Landlords (HCV) **Input options and instructions** What is the maximum penalty payment that can be made to a [Text box] landlord under this policy? How many penalty payments were charged under this policy in [number] the most recently completed PHA fiscal year? Input options and instructions 5.c. - Third-Party Requirement (HCV) [Text box] and [Upload file] options NOT CURRENTLY IMPLEMENTED Please explain or upload a description of the quality assurance method. NOT CURRENTLY 5.d. - Alternative Inspection Schedule (HCV) [No custom questions for this activity.] IMPLEMENTED

C.6 Short-Term Assistance	
6.a., 6.b Short-Term Assistance (PH & HCV)	Input options and instructions
What is the term of assistance?	[number of months] NOT CURRENTLY IMPLEMENTED
How is the tenant contribution established for this program?	[Text box]
How many households do you expect to serve in this program in	[Numerical entry only allowed]
the Fiscal Year?	
How do you fulfill the obligation to offer participants in this	[Text box]
program the opportunity to transition to the HCV or public	
housing (as applicable) program subject to availability?	
Please list any partner organizations and briefly note the services	[Text box]
that each provides.	

C.7 Term-Limited Assistance

7.a., 7.b Term-Limited Assistance (PH & HCV)	Input options and instructions
Does the term-limited assistance MTW activity exempt any type	Yes/No [If Yes]: Please describe the conditions for exemption.
of household or individual other than the elderly or individuals with disabilities	[text box] NOT CURRENTLY IMPLEMENTED
Please describe how the MTW agency supports households to prepare for the end of assistance.	[Text box]
How many households are currently subject to this policy?	[number]

C.8 Increase Elderly Age

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8 Increase Elderly Age (PH & HCV)	Input options and instructions
What is the new definition of elderly? NOT CURRENTLY IMPLEMENT	EDyears old [Numerical entry allowed between 62 - 65]

C.9 Project-Based Voucher Program Flexibilities (PBV)	
9.a Increase PBV Program Cap (HCV)	Input options and instructions
What percentage of total authorized HCV units will be authorized for project-basing?	% NOT CURRENTLY IMPLEMENTED
9.b Increase PBV Project Cap (HCV)	[No custom questions for this activity.]
9.c Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement (HCV)	[No custom questions for this activity.] NOT CURRENTLY IMPLEMENTED
9.d Alternative PBV Selection Process (HCV)	[No custom questions for this activity.]
9.e Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Input options and instructions
How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?	Units NOT CURRENTLY IMPLEMENTED
How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?	Units
How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?	Units
How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?	Units
9.f Increase PBV Housing Assistance Payment (HAP) Contract Length (HCV)	[No custom questions for this activity.] NOT CURRENTLY IMPLEMENTED
9.g Increase PBV Rent to Owner (HCV)	[No custom questions for this activity.]
9.h Limit Portability for PBV Units (HCV)	[No custom questions for this activity.]

C.10 Famil	Family Self-Sufficiency Program with MTW Flexibility (Traditional)		
10.a Waive HCV)	Operating a Required FSS Program (PH &	[No custom questions for this activity.] NOT CURRENTLY IMPLEMENTED	

10.b Alternative Structure for Establishing Program Coordinating Committee (PH & HCV)	Input options and instructions
Please describe the alternative structure and how it is designed to secure local resources to support an MTW Self-Sufficiency program.	[Text box] NOT CURRENTLY IMPLEMENTED
10.c Alternative Family Selection Procedures (PH & HCV)	Input options and instructions
Please describe the purpose and goals of the alternative contract	[Text box]
or locally developed agreement, and/or the MTW agency's motivation for developing its own contract or agreement.	NOT CURRENTLY IMPLEMENTED
10.d Modify or Eliminate the Contract of Participation (PH & HCV)	[No custom questions for this activity.]
10.e Policies for Addressing Increases in Family Income (PH & HCV)	Input options and instructions
How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?	[Text box] NOT CURRENTLY IMPLEMENTED

Input options and instructions
Yes/No [If Yes]: Please describe the population group for whom participation in the MTW Self-Sufficiency program is mandatory. [Text box] NOT CURRENTLY IMPLEMENTED
Input options and instructions
[Text box]

C.12 Work Requirement	
12.a., 12.b. – Work Requirement (PH & HCV)	Input options and instructions
Does the work requirement MTW activity exempt any type of household or individual other than those required to be excluded through the MTW Operations Notice or those excluded as a reasonable accommodation?	Yes/No [If Yes]: Please describe the conditions for exemption. [Text box] NOT CURRENTLY IMPLEMENTED
What counts as "work" under this the work requirement MTW activity?	[Text box]
How will the MTW agency monitor compliance with the work requirement MTW activity?	[Text box]
What supportive services are offered to support households to comply with the work requirement?	[Text box]
How does the agency address noncompliance with the work requirement policy?	[Text box]
How many households are currently subject to the policy?	[number]
How many households in the most recently completed PHA fiscal year were sanctioned for non-compliance with the work requirement?	[number]

C.13

Public Housing as an Incentive for Economic Progress

13 Public Housing as an Incentive for Economic Progress (PH)	Input options and instructions	
How many months will households be able to remain in a unit while over income?	[number] NOT CURRENTLY IMPLEMENTED	

C.14 Moving On Policy	
14.a Waive Initial HQS Inspection Requirement (HCV)	[No custom questions for this activity.] NOT CURRENTLY
14.b Allow Income Calculations from Partner Agencies (PH and HCV)	[No custom questions for this activity.]
14.c Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH & HCV)	[No custom questions for this activity.]

C.15 Acquisition without Prior HUD Approval			
15 Acquisition without Prior HUD Approval (PH)	[No custom questions for this activity.] NOT CURRENTLY		
	IMPLEMENTED		
C.16 Deconcentration of Poverty in Public Housing Policy			
16 Deconcentration of Poverty in Public Housing (PH)	[No custom questions for this activity.] NOT CURRENTLY		
	IMPLEMENTED		
C.17 Local, Non-Traditional (LNT) Activities			
17.a Rental Subsidy Programs	Input options and instructions		
Does the MTW activity apply to all LNT units/properties?	The MTW activity applies to all units/properties The MTW activity applies to specific units/properties		
NOT CURRENTLY IMPLEMENTED	If the agency selects "The MTW activity applies to specific		
	LNT units/properties" then it is presented the follow up question:		
	Describe which LNT units/properties participate in the MTW		

activity? [Text box]

Table 17.a.1 - For each third-party partner, please complete the information in the following table.

Third-party Partner	Type of Services the Partner Provides	# of Units Allocated to that Partner for the Fiscal Year

17.b Service Provision	Input options and instructions
What types of services is the MTW agency providing?	[Text box]
How many households did the PHA provide services to in the	[number]
most recently completed PHA Fiscal Year through this activity?	

17.b Service Provision	Input options and instructions	
Does the MTW activity apply to all LNT units/properties?	 The MTW activity applies to all units/properties The MTW activity applies to specific units/properties If the agency selects "The MTW activity applies to specific LNT units/properties" then it is presented the follow up question: 	
	Describe which LNT units/properties participate in the MTW activity? [Text box]	
Are any families receiving services only (i.e., services only and no housing assistance provided by the PHA)?	Yes/No [If yes, answer question below.] # of persons receiving LNT services only in the most recently completed PHA fiscal year.	

17.c. - Housing Development Programs

For each LNT housing development that the MTW agency will commit funds to or spend funds on in this Fiscal Year, in Table 17.c.1 below please add the name of the development to one column heading and then provide the requested information, including the MTW agency role (Acquisition, Rehabilitation, or New Construction), the type of MTW agency financing (Gap Financing, Tax Credit Partnership, Other), and the total number of affordable units in the development. If possible, please provide a breakdown of the number of affordable units by level of affordability.

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year [autofill upcoming year]

Question	[add name of development and address]			
MTW Role: Acquisition, Rehabilitation, New Construction?	NONE			
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units Total Number of Units				
Number of Units by Affordability				
• 80% of AMI				
• 60% of AMI				
30% of AMI Other				

Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year [autofill upcoming year]

Question	[add name of development and address]			
MTW Role: Acquisition,				
Rehabilitation, New				
Construction?	NONE			
Type of MTW Agency Financing:				
Gap Financing, Tax Credit				
Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
• 80% of AMI				
• 60% of AMI				
• 30% of AMI				
• Other				

For each LNT housing development that the MTW agency committed funds to or spent funds on in the most recently completed Fiscal Year, please add the name of the development to one column in Table 17.c.2 below heading and then provide the requested information, including the MTW agency role (Acquisition, Rehabilitation, or New Construction), the type of MTW agency financing (Gap Financing, Tax Credit Partnership, Other), and the total number of affordable units in the development. If possible, please provide a breakdown of the number of affordable units by level of affordability.

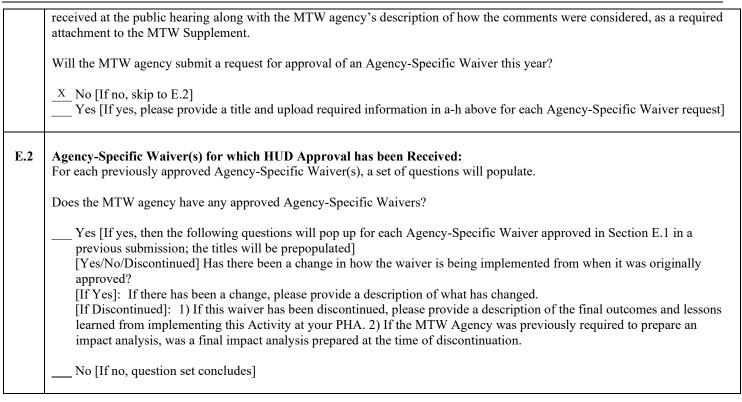
Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year [autofill previous year]

Question	[add name of development and address]			
MTW Role: Acquisition,				
Rehabilitation, New	NONE			
Construction?	NONE			
Type of MTW Agency Financing:				
Gap Financing, Tax Credit				
Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
• 80% of AMI				
• 60% of AMI				
• 30% of AMI				
• Other				

Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year [autofill previous year]

Question	[add name of development and address]			
MTW Role: Acquisition, Rehabilitation, New Construction?	NONE			
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units Total Number of Units				
Number of Units by Affordability • 80% of AMI				
 60% of AMI 30% of AMI 				
• Other				

D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be provided: (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor, (b) the specific safe harbor and its implementing regulation, (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver, (d) a description of the local issue and why such an expansion is needed to implement the MTW activity, (e) an impact analysis, (f) a description of the hardship policy for the MTW activity, if applicable, and (g) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.
	No Yes [If yes, upload required information in a-g above for each Safe Harbor Waiver request]
E.	Agency-Specific Waivers.
E.1	Agency-Specific Waivers for HUD Approval:
	The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.
	In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.
	For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments



F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$	\$	\$	9/30/2029
2022	\$	\$	\$	9/30/2030
2023	\$	\$	\$	9/30/2031

G.	MTW Statutory Requirements.
G.1	75% Very Low Income – Local, Non-Traditional.
	HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.

G.3

Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	#
49%-30% Area Median Income	#
Below 30% Area Median Income	#
Total Local, Non-Traditional Households	#

Substantially the Same (STS) – Local, Non-Traditional.

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2 Establishing Reasonable Rent Policy.	
Question	Input options and instructions
Has the MTW agency established a rent reform policy to	Yes/No [If Yes]: please describe the MTW agency's plans for its
encourage employment and self-sufficiency? YES	future rent reform activity and the implementation timeline. [Text
	box]

Questions	Input options and instructions
Please provide the total number of unit months that families were	_0_ # of unit months
housed in a local, non-traditional rental subsidy for the prior full	
calendar year.	
Please provide the total number of unit months that families were	0 # of unit months
housed in a local, non-traditional housing development program	
for the prior full calendar year.	
How many units, developed under the local, non-traditional	Please include only those units that serve households at or below
housing development activity, were available for occupancy	80% of AMI in the table provided.
during the prior full calendar year (by bedroom size)?	

PROPERTY NAME/ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Totals	#	#	#	#	#	#	#		#	#		

* User will select one of the following from the "Population Type" dropdown box: General, Elderly, Disabled, Elderly/Disabled, Other

If the "Population Type" of is Other is selected, please state the Property Name/Address and describe the population type. [Text box]

** The federal accessibility standard under HUD's Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance. HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice") for purposes of Section 504 compliance, <u>https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf</u>. This would also include adaptable units as defined by HUD's Section 504 regulation (See 24 CFR § 8.3 and § 8.22).

G.4 | Comparable Mix (by Family Size) – Local, Non-Traditional.

In order to demonstrate that the MTW statutory requirement of "maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration" is being achieved, the MTW agency will provide information for its most recently completed Fiscal Year in the following table.

Local, non-traditional family size data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

Family Size:	Occupied Number of Local, Non- Traditional units by Household Size
1 Person	# 0
2 Person	# 0
3 Person	# 0
4 Person	# 0
5 Person	# 0
6+ Person	# 0
Totals	# 0

G.5	Housing Quality Standards.
	Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program. The public
	housing program is monitored through physical inspections performed by the Real Estate Assessment Center (REAC).

H. Public Comments.

H.1	Input options and instructions
Please provide copy of all comments received by the public,	Upload Attachment
Resident Advisory Board, and tenant associations.	
Please attach a narrative describing the MTW agency's analysis	Upload Attachment
of the comments and any decisions made based on these	
comments.	
If applicable, was an additional public hearing held for an	Yes
Agency-Specific Waiver and/or Safe Harbor waiver?	No
	N/A
If yes, please attach the comments received along with the MTW	Upload Attachment
agency's description of how comments were considered.	

I	Evaluations.			
I.1	Please list any ongoing and completed evaluations of the MTW agency's MTW policies, that the PHA is aware of, including the information requested in the table below. In the box "title and short description," please write the title of the evaluation and a brief description of the focus of the evaluation.			
Question		Input options and instructions		
Does the PHA have an agency-sponsored evaluation? Yes/		Yes/No [If Yes]: Please complete the table below.		

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available

J	MTW Certifications of Compliance.
J.1	The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD. Certification is provided below.

DRAFT

MTW CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

Certifications of Compliance with Regulations: Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (<u>DD/MM/YYYY</u>), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a). (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request. (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act. (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements. (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35. (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200. (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration. (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers. (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA. MTW PHA NAME MTW PHA NUMBER/HA CODE I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802). NAME OF AUTHORIZED OFFICIAL TITLE **SIGNATURE** DATE
 - * Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

TABLE 1. GUIDE

- Core questions An "X" in this column means that these are the set of core questions that are relevant for every waiver/activity.
- Custom questions An "X" in this column means that these are questions that are specific to a particular activity. Not every activity will have custom questions.
- Safe Harbor An "X" in this column means that the activity as described in Appendix 1 of the MTW Operations Notice includes a set of Safe Harbor provisions.
- Impact Analysis An "X" in this column means that the activity as described in Appendix 1 of the MTW Operations Notice requires the PHA to conduct an impact analysis. This impact analysis must be submitted to HUD via the MTW Supplement; thus, the Supplement should include some statement regarding the requirement and an opportunity for the PHA to upload the impact analysis. The Operations Notice also states that an updated impact analysis must be attached to the MTW Supplement in each subsequent year.
- Hardship Policy An "X" in this column means that the activity as described in Appendix 1 of the MTW Operations Notice requires the PHA to establish a hardship policy. The hardship policy must be submitted to HUD via the MTW Supplement; thus, the Supplement should include some statement regarding the requirement and an opportunity for the PHA to upload the hardship policy. PHA must still grant reasonable accommodation requests related to all activities even if the hardship policy is not in place.

TABLE 1. MTW ACTIVITIES QUESTIONS FOR THE MTW SUPPLEMENT

Section/Question1. Tenant Rent Policiesa. Tiered Rent (PH)b. Tiered Rent (HCV)c. Stepped Rent (HCV)d. Stepped Rent (HCV)e. Minimum Rent (HCV)g. Total Tenant Payment as a Percentageof Gross Income (PH)h. Total Tenant Payment as a Percentageof Gross Income (HCV)i. Alternative Utility Allowance (PH)j. Alternative Utility Allowance (HCV)k. Fixed Rents (PH)	Questions X X X X X X X X X X X X X X X	Questions X X X X X X X X X X X X X X X X X X X	Harbor X X X X X X X X X X X X X X X X X X X	Analysis X X X X X X X	Policy X X X X X X
a. Tiered Rent (PH) b. Tiered Rent (HCV) c. Stepped Rent (PH) d. Stepped Rent (HCV) e. Minimum Rent (PH) f. Minimum Rent (PH) g. Total Tenant Payment as a Percentage of Gross Income (PH) h. Total Tenant Payment as a Percentage of Gross Income (HCV) i. Alternative Utility Allowance (PH) j. Alternative Utility Allowance (HCV)	X X X X X X X X	X X X X X X X	X X X X X X X	X X X	X X X
b. Tiered Rent (HCV) c. Stepped Rent (PH) d. Stepped Rent (HCV) e. Minimum Rent (PH) f. Minimum Rent (HCV) g. Total Tenant Payment as a Percentage of Gross Income (PH) h. Total Tenant Payment as a Percentage of Gross Income (HCV) i. Alternative Utility Allowance (PH) j. Alternative Utility Allowance (HCV)	X X X X X X X X	X X X X X X X	X X X X X X X	X X X	X X X
c. Stepped Rent (PH) d. Stepped Rent (HCV) e. Minimum Rent (PH) f. Minimum Rent (HCV) g. Total Tenant Payment as a Percentage of Gross Income (PH) h. Total Tenant Payment as a Percentage of Gross Income (HCV) i. Alternative Utility Allowance (PH) j. Alternative Utility Allowance (HCV)	X X X X X X X X	X X X X X X	X X X X X X	X X X	X X X
d. Stepped Rent (HCV) e. Minimum Rent (PH) f. Minimum Rent (HCV) g. Total Tenant Payment as a Percentage of Gross Income (PH) h. Total Tenant Payment as a Percentage of Gross Income (HCV) i. Alternative Utility Allowance (PH) j. Alternative Utility Allowance (HCV)	X X X X X X X	X X X X	X X X X	X X X	X X X
e. Minimum Rent (PH) f. Minimum Rent (HCV) g. Total Tenant Payment as a Percentage of Gross Income (PH) h. Total Tenant Payment as a Percentage of Gross Income (HCV) i. Alternative Utility Allowance (PH) j. Alternative Utility Allowance (HCV)	X X X X X X	X X X	X X X	X X	X X
f. Minimum Rent (HCV) g. Total Tenant Payment as a Percentage of Gross Income (PH) h. Total Tenant Payment as a Percentage of Gross Income (HCV) i. Alternative Utility Allowance (PH) j. Alternative Utility Allowance (HCV)	X X X X	X X	X	Х	Х
g. Total Tenant Payment as a Percentage of Gross Income (PH)h. Total Tenant Payment as a Percentage of Gross Income (HCV)i. Alternative Utility Allowance (PH) j. Alternative Utility Allowance (HCV)	X X X	X	Х		
of Gross Income (PH) h. Total Tenant Payment as a Percentage of Gross Income (HCV) i. Alternative Utility Allowance (PH) j. Alternative Utility Allowance (HCV)	X X			Х	37
of Gross Income (HCV) i. Alternative Utility Allowance (PH) j. Alternative Utility Allowance (HCV)	Х	X			Х
i. Alternative Utility Allowance (PH) j. Alternative Utility Allowance (HCV)	Х	Х			
i. Alternative Utility Allowance (PH) j. Alternative Utility Allowance (HCV)	Х		Х	Х	Х
	37	Х	Х		
k Fixed Rents (PH)	Х	Х	Х		
K. I IACU ICHIIS (I II)	Х	Х	Х		
1. Fixed Subsidy (HCV)	Х	Х	Х		
m. Utility Reimbursements (PH)	Х				
n. Utility Reimbursements (HCV)	Х				
o. Initial Rent Burden (HCV)	Х	Х	Х	Х	
p. Imputed Income (PH)	Х	Х	Х	Х	Х
q. Imputed Income (HCV)	Х	Х	Х	Х	Х
r. Elimination of Deduction(s) (PH)	Х	Х	Х	Х	Х
s. Elimination of Deduction(s) (HCV)	Х	Х	Х	Х	Х
t. Standard Deductions (PH)	Х	Х	Х	Х	Х
u. Standard Deductions (HCV)	Х	Х	Х	Х	Х
v. Alternative Income					
Inclusions/Exclusions (PH)	Х	Х	Х		
w. Alternative Income					
Inclusions/Exclusions (HCV)	Х	Х	Х		
2. Payment Standards and Rent					
Reasonableness					
a. Payment Standards- Small Area Fair					
Market Rents (HCV)	Х	Х	Х	Х	Х
b. Payment Standards- Fair Market Rents (HCV)	Х	Х	Х	Х	Х

Section/Question	Core Questions	Custom Questions	Safe Harbor	Impact Analysis	Hardship Policy
c. Rent Reasonableness – Process (HCV)	Х	Х	Х		
d. Rent Reasonableness – Third-Party					
Requirement (HCV)	Х	Х	Х		
3. Reexaminations			•		
a. Alternative Reexamination Schedule					
for Households (PH)	Х	Х	Х	Х	Х
b. Alternative Reexamination Schedule					
for Households (HCV)	Х	Х	x	Х	Х
c. Self-Certification of Assets (PH)	X	X	X X	21	
d. Self-Certification of Assets (HCV)	X	X	X		
	Λ	Λ	Λ		
4. Landlord Leasing Incentives					
a. Vacancy Loss (HCV-Tenant-based	V	V	V		
Assistance)	Х	X	Х		
b. Damage Claims (HCV-Tenant-based					
Assistance)	Х	X	Х		
c. Other Landlord Incentives (HCV-					
Tenant-based Assistance)	Х	X	Х		
5. Housing Quality Standards (HQS)		-	-		-
a. Pre-Qualifying Unit Inspections					
(HCV)	Х	Х	Х		
b. Reasonable Penalty Payments for					
Landlords (HCV)	Х	Х	Х		
c. Third-Party Requirement (HCV)	X X	Х	X X		
d. Alternative Inspection Schedule					
(HCV)	X		X		
6. Short-Term Assistance					
a. Short-Term Assistance (PH)	X	X	X	X	X
b. Short-Term Assistance (HCV)	X	X	X	X	X
7. Term-Limited Assistance	Λ	Λ	Λ		Λ
	V	V	V	V	V
Term-Limited Assistance (PH)	X	X	X	X	X
Term-Limited Assistance (HCV)	Х	X	X	Х	Х
8. Increase Elderly Age (PH & HCV)	Х	X	Х		
9. Project-Based Voucher Program					
Flexibilities		T	1	F	
a. Increase PBV Program Cap (HCV)	Х	Х	X		
b. Increase PBV Project Cap (HCV)	Х		Х		
c. Elimination of PBV Selection Process					
for PHA-owned Projects Without	V		v		
Improvement, Development, or	Х		Х		
Replacement (HCV)					
d. Alternative PBV Selection Process					
(HCV)	Х		Х		
e. Alternative PBV Unit Types (Shared					
Housing and Manufactured Housing)	Х	Х	Х		
(HCV)	24	21	21		
f. Increase PBV HAP Contract Length					
(HCV)	Х		Х		
	V		v		
g. Increase PBV Rent to Owner (HCV)	X		X		
h. Limit Portability for PBV Units (HCV)	Х		Х		
10. Family Self-Sufficiency Program with MTW Flexibility			-		
a. Waive Operating a Required FSS					
Program (PH & HCV)	Х		Х	Х	Х

	Core	Custom	Safe	Impact	Hardship
Section/Question	Questions	Questions	Harbor	Analysis	Policy
b. Alternative Structure for Establishing	2	2		y ~~~	_ 00j
Program Coordinating Committee (PH					
& HCV)	Х	Х	Х	Х	Х
c. Alternative Family Selection					
Procedures (PH & HCV)	Х	Х	Х	Х	Х
d. Modify or Eliminate the Contract of					
Participation (PH & HCV)	Х		Х	Х	Х
e. Policies for Addressing Increases in					
Family Income (PH & HCV)	Х	Х	Х	Х	Х
11. MTW Self-Sufficiency Program					
a. Alternative Family Selection					
Procedures (PH & HCV)	Х	Х	Х	Х	Х
b. Policies for Addressing Increases in					
Family Income (PH & HCV)	Х	Х	Х	Х	Х
12. Work Requirement					
a. Work Requirement (PH)	Х	Х	Х	Х	Х
b. Work Requirement (HCV)	Х	Х	Х	Х	Х
13. Use of Public Housing as an Incentive					
for Economic Progress (PH)	Х	Х	Х		
14. Moving on Policy					
a. Waive Initial HQS Inspection					
Requirement (HCV)	Х		Х		
b. Allow Income Calculations from					
Partner Agencies (PH & HCV)	Х		X		
c. Aligning Tenant Rents and Utility					
Payments Between Partner Agencies					
(PH & HCV)	X		X		
15. Acquisition without Prior HUD					
Approval (PH)	X		X		
16. Deconcentration of Poverty in Public					
Housing Policy (PH)	Х		Х		
17. Local, Non-Traditional Activities		T			
a. Rental Subsidy Programs	Х	Х	Х		
b. Service Provision	Х	Х	Х		
c. Housing Development Programs	Х	Х	Х		

Instructions for Preparation of Form HUD-50075-MTW, MTW Supplement to the Annual PHA Plan

The instructions below detail how to complete the MTW Supplement. These instructions will not appear in the fillable form.

Note about file uploads: PHAs can upload PDF or Word documents. Files should be named with the following naming convention: PHA code, Fiscal Year (FY), and short name for the policy/item. Some examples would be CA789FY21RentHardship for a rent hardship policy, CA789FY21ImpactAnalysis for an impact analysis that is applicable to multiple MTW activities, and CA789FY21MTWCertofCompliance for the MTW Certifications of Compliance.

A. PHA Information. All PHAs must complete this section.

- A.1 Include the full PHA Name, PHA Code, PHA Fiscal Year Beginning (MM/DD/YYYY), MTW Cohort Number, and MTW Supplement Submission Type.
- B. Narrative. All MTW agencies must complete this section.

B.1 MTW Supplement Narrative.

Provide a written description of how the MTW agency seeks to address the three statutory objectives during the coming year. Those three statutory objectives are: (1) to reduce cost and achieve greater cost effectiveness in federal expenditures; (2) to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; (3) and to increase housing choices for low-income families.

The narrative provides the PHA an opportunity to explain to the public, and the families that it serves, its MTW plans and goals for the coming Fiscal Year.

C. MTW Waivers.

Core Questions. All MTW activities found in Section C require responses to the same common questions.

Narrative. Describe the activity, the agency's goals for this activity, and, if applicable, how this activity contributes to a larger initiative.

Statutory Objective. Indicate which of the MTW statutory objectives this activity serves; each activity may serve one or more objectives. The three statutory objectives are housing choice, self-sufficiency, and cost effectiveness. Check all that apply.

Cost Implications. State the cost implications of each activity. Choose the best description of the cost implications based on what is known at the time of completing the MTW Supplement. Indicate which categories best describe the cost implications of the activity from among the following choices: neutral (no cost implications), increased revenue, decreased revenue, increased costs, decreased costs. Check all that apply. For instance, an activity may increase revenue, increase costs, and therefore be cost neutral. Alternatively, an activity may simply increase costs.

Different versions. Indicate whether there will be different policies for different household statuses, family types, or locations (public housing developments or HCV properties). If [Yes] is checked, questions will pop up which allow the MTW agency to explain which household statuses, family types, and/or locations will be affected. If [No] is checked, the respondent will move on to the next question. The agency will be able to indicate if a policy is different for one or more of these areas.

For example, if an MTW agency chooses to apply a Tenant Rent Policy to only non-elderly, non-disabled families, and not to the elderly or disabled, then it would check [Yes] and then receive the subsequent items that allow the agency to indicate what types of households and family types are affected by the activity.

Household status. MTW Agency's must indicate what type of household to which the activity applies. Household types means the following types: new admissions only, currently assisted households only, or new admissions and currently assisted households.

Family Types: Family types mean the following: non-elderly, non-disabled families; elderly families; disabled families; or other specifically defined target populations.

Location. The MTW agency indicates if the activity is or will be implemented at all or only at certain locations. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV. For PH, the questions will be about developments and for HCV the questions will be about tenant-based units and properties with project-based vouchers. The agency must check the applicable response for all or specific. If the response is for specific locations, then the agency will be asked to provide the details.

PHAs may develop one comprehensive hardship policy to cover all MTW activities requiring a hardship policy, which would only need to be uploaded once.

Safe Harbor Waiver. PHAs must indicate if a Safe Harbor Waiver is needed to implement this policy as described. If yes, then the MTW Agency is asked the following: what is the status of the Safe Harbor Waiver Request? PHAs must indicate if the waiver request is being submitted for review with this submission of the MTW Supplement (see Section D), or if the waiver was previously approved. If the latter is checked (the waiver was previously approved), then the PHA must describe the extent to which the Safe Harbor Waiver is supporting the PHA's goal in implementing this activity.

Hardship policy. The MTW Operations Notice requires agencies to adopt written policies for determining when a requirement or provision of the MTW activity constitutes a financial or other hardship for the family. If applicable for the activity, please upload the hardship policy associated with this activity. Hardship policies may be applicable to multiple MTW Activities. Only upload Hardship Policy once if said Hardship Policy applies to multiple Activities. Reference Table 1 for specificity on when a hardship policy is required.

Modification of hardship policy. PHAs must indicate if the hardship policy has been modified since the last submission of the MTW Supplement. PHAs must check yes or no. If yes, then the respondent is asked: why has the MTW agency modified the hardship policy? The PHA will use the provided text box to describe the modifications.

Number of hardship requests. PHAs must indicate the number of hardship requests that have been received for each applicable activity in the most recently completed PHA fiscal year.

PHAs are legally required to provide reasonable accommodations to their MTW requirements, provisions, or policies, or any component of those requirements, provisions, and policies, following the same standards and processes that generally apply to reasonable accommodations.

Impact analysis. The MTW Operations Notice requires agencies to analyze and put into writing the various impacts of the MTW activity if it is required for the MTW activity. Please upload the impact analysis that has been prepared related to this activity, if applicable. An impact analysis may be applicable to multiple MTW Activities. Only upload Impact Analysis once if said Impact Analysis applies to multiple Activities. Reference Table 1 for specificity on when an impact analysis is required.

Description of accomplishments or changes in implementation. Provide a description, based on the Fiscal Year goals as listed in the activity's previous Fiscal Year's narrative, about what has been accomplished or changed during the implementation.

Discontinuation of activity. If the PHA selects "Will be Discontinued in the Submission Year" or "Was Discontinued in a previous Submission Year" in the screener, a question will be displayed that asks for an explanation as to why the activity was discontinued or will be discontinued. The PHA should explain why the activity was or will be discontinued. If the activity has already been discontinued, the PHA should include the final outcomes and lessons learned. If the activity was discontinued in a previous submission year, the PHA should state which year the activity was discontinued in.

Custom Questions. Some MTW activities require responses to custom questions that are specific only to that activity. Some MTW activities contain no custom questions. Respondents must answer each of the custom questions, which will only appear if the PHA is opting to implement the MTW activity in the coming Fiscal Year.

Information for how to answer each custom question is included in the 'input options and instructions' column for each MTW activity.

D. Safe Harbor Waivers.

D.1: Safe Harbor Waivers seeking HUD Approval. The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I For each Safe Harbor Waiver request, a document that includes the following must be provided: a) the name and activity number of the MTW Waiver for which the PHA is seeking to expand the safe harbor, b) the specific safe harbor and its implementing regulation, c) the proposed policy the PHA wishes to implement via this waiver, d) a description of the local issue and why such an expansion is needed to implement the activity, e) an impact analysis, f) a description of the hardship policy for the initiative, and g) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

E. Agency-Specific Waivers.

E.1: Agency-Specific Waivers Submitted for HUD Approval. The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, waive a statutory or regulatory requirement not included in Appendix I.

In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable).

For each Agency-Specific Waiver(s) request, please provide a title and upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or MTW Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative; f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

A PHA planning to pursue an Agency-Specific Waiver is encouraged to read Section 4.c. of the MTW Operations Notice prior to filling out this section of the MTW Supplement.

E.2: Agency-Specific Waiver(s) for which HUD Approval has been Received. For each previously approved Agency-Specific Waiver(s), a set of questions will populate. Does the agency have any approved agency-specific waivers? If yes, the title previously provided in Section E.1 will prepopulate and ask if there has been a change in how the Agency-Specific Waivers is being implemented from when it was originally approved or if it has been discontinued. For changes, the PHA will need to provide a description of what has changed. If it has been discontinued, the PHA will need to provide a description about the final outcomes and lessons learned, as well as whether a final impact analysis was prepared at the time of discontinuation if one was previously required.

F. Public Housing Operating Subsidy Grant Reporting

F.1: Public Housing Operating Subsidy Grant Reporting. PHAs must fill out this table if it receives public housing Operating Subsidy grant funding from HUD. Only public housing Operating Subsidy grant funding awarded in the year the PHA is designated an MTW agency and beyond must be reported in this table. Additional rows must be added for Federal Fiscal Years beyond 2023, as applicable.

The federal account closing law applies to time-limited funds appropriated by Congress during the annual appropriations act process. For the public housing Operating Fund, PHAs must expend federal funds no more than five (5) years after the period of availability for obligation expires. After this 5-year period, the account closes, and the funds are no longer available for any purpose. For public housing Operating Subsidy grant funding, the period of availability for obligation ends at the end of the fourth Federal Fiscal Year (i.e., the period of availability for obligation of FY 2021 funds ends 9/30/2024). Pursuant to the account closing law, PHAs must expend all Operating Subsidy grant amounts within five years of this date (i.e., for FY 2021 funds, the account will close, and funds will no longer be legally available for any purpose on 9/30/2029).

G. MTW Statutory Requirements.

General. HUD will verify compliance with the statutory requirements G.1, G.3, and G.4 for public housing units and HCV units through HUD systems. In addition, agencies are to report compliance with the same requirements for Local, Non-Traditional

Households in the tables provided in this section. Once HUD systems are capable of capturing this data then this will no longer need to be reported through the MTW Supplement.

G.1: 75% Very Low Income. All PHAs must fill out the table in G.1. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its local, non-traditional program households. For instance, a PHA submitting its MTW Supplement to the FY2020 Annual PHA Plan should include its Fiscal Year (FY) 2018 local, non-traditional data since this is the most recently completed Fiscal year. Only local, non-traditional new admissions should be included in the table. If a PHA houses no local, non-traditional households, then zeros must be inputted into the table.

HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW PHA are very low income for public housing and HCV programs through existing HUD systems.

G.2: Establishing Reasonable Rent Policy. All PHAs must fill out section G.2. Per the MTW Operations Notice, all activities falling under the Tenant Rent Policies category (Section C.1 of the MTW Supplement) or the Alternative Reexamination Schedule category (Section C.3 of the MTW Supplement), detailed in the Appendix of the MTW Operations Notice, meet the definition of a reasonable rent policy.

MTW agencies are reminded that the Rent Determination section of the PHA Plan should be reflective of MTW reasonable rent policies where applicable. From the PHA Plan: "Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d)).

G.3: Substantially the Same (STS). All PHAs must fill out section G.3. The number of local, non-traditional families served must be provided by month for the most recently completed Calendar Year. If a PHA houses no local, non-traditional families, then zeros must be inputted into the table. The additional information on Local, Non-Traditional development units must be provided for each development.

HUD will verify compliance with the STS statutory requirement for public housing and HCV programs through existing HUD systems.

G.4: Comparable Mix (by Family Size). All PHAs must fill out section G.4. In order to demonstrate that the statutory objective of "maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration" is being achieved, the PHA will provide family size (i.e., not bedroom size) data in the table for the most recently completed Fiscal Year. For instance, a PHA submitting its MTW Supplement to the FY2021 Annual PHA Plan should include its FY 2019 local, non-traditional data since this is the most recently completed Fiscal Year. If a PHA houses no local, non-traditional household, then zeros must be inputted into the table.

HUD will verify compliance with the comparable mix statutory requirement for public housing and HCV programs through existing HUD systems.

G.5: Housing Quality Standards. PHAs are not required to enter any information into section G.5. This statutory requirement is certified to in the MTW Certifications of Compliance form for the HCV and local, non-traditional housing programs. The public housing program is monitored by HUD through the Public Housing Assessment System (PHAS) Physical Subsystem, or successor, despite the MTW PHA being exempt from an overall designation.

H. Public Comments.

H.1: Public Comments. All PHAs are required, per the Annual PHA Plan regulations, to go through a public process prior to submitting the MTW Supplement to HUD. The MTW agency must consider, in consultation with the Resident Advisory Board (RAB) and tenant association, as applicable, all of the comments received at the public hearing. The comments received by the public, RABs, and tenant associations must be submitted by the MTW agency, along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

As described above, PHAs must submit comments and responses for all Safe Harbor and Agency-Specific Waivers, which are to be held in an additional public meeting.

The public comment process must include the Supplement and all uploaded attachments.

I. Evaluations

I.1: Evaluations. The MTW agency should fill in Table I.1, listing each evaluation of the MTW policies and providing contact information for the evaluator, the time period of the evaluation, and the names of available reports. The MTW agency should list internal evaluations that result in reports that could be shared upon request but may leave off evaluations meant for internal use only. The MTW agency should list all third-party evaluations, as applicable.

J. MTW Certifications of Compliance.

J.1: MTW Certifications of Compliance Form. The format for submission of the required MTW Certifications of Compliance is provided in this Form MTW Supplement. The preamble to the MTW Certifications of Compliance directs the MTW PHA to fill in the beginning of the Fiscal Year for which the certification is being made. This should be provided as the first day of the Fiscal Year to be covered by the Annual PHA Plan (for example, a FY2021 Annual PHA Plan for an MTW PHA with a Fiscal Year of January 1 – December 31, this would be January 1, 2021).

The MTW Certifications of Compliance must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

The MTW Certifications of Compliance must be submitted to HUD as part of the MTW Supplement for each annual submission and each revised annual submission.

Public reporting burden for this information collection is estimated to average 6.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB control number. The information collected is required to obtain or retain benefits. The information collected will not be held confidential.

Annual Plan Attachment

Section B.1 Annual Plan Element Proposed Changes FY25

Statement of Housing Needs and Strategy for Addressing Housing Needs.

A. Housing Choice Voucher Waiting List. The AAHC currently has the following preferences: persons with a disability, resident or works in Washtenaw or Monroe County, seniors and a limited preference for homeless households. AAHC last opened its waiting list on August 3, 2020; we received over 3,300 applications. Although, the regular HCV waiting list remains closed we continued to accept applications from households qualified for households with a disabled adult between the ages 18-61. Below are the waiting list demographics as of 11/19/24:

White 748			
Black	2738		
Asian	34		
American Indian	18		
Pacific Islander	3		
Multiple Race	306		
No Identification	0		
Hispanic	151		
Non-Hispanic	3696		
Female	3058		
Male	788		
Average Annual Income	\$12,038		
Average Household Size	2		
Elderly (Age 62 and older)	433		
Disabled	1082		
Homeless	1458		

HCV Waiting List

B. Project Based Voucher Waiting List: The AAHC currently has the following preferences: persons with a disability, resident or works in Washtenaw or Monroe County, seniors and a limited preference for homeless households. AAHC manages some site-based waiting lists and a combined waiting list for its PBV program and RAD PBV program. In October 2024, AAHC opened the PBV/RAD PBV waitlist for four (4) and five (5) bedroom units. In October 2024, the AAHC opened the site-based Charring Square Waiting List in Monroe County for one (1) and three (3) bedroom units. AAHC has an open waiting list for senior housing developments, Lurie Terrace and Courthouse Square. Below are the waiting list demographics as of 11/19/24:

PBV Waiting List

	Charring	Lurie	Courthouse	RAD PBV
White	158	154	217	410
Black	669	106	186	1635
Asian	4	9	7	16
American Indian	7	3	6	10
Pacific Islander	1	0	0	2

Multiple Race	91	18	0	194
No Identification	0	0	0	1
Hispanic	33	11	15	79
Non-Hispanic	897	279	428	2189
Female	726	173	247	1858
Male	204	117	196	410
Average Household Size	2	1	1	3
Elderly (Age 62 and older)	38	320	158	146
Disabled	222	135	140	500
Homeless	544	86	93	1037
Average Annual Income	\$12,183	\$16,097	\$14,359	\$13,010

Administrative Plan Policies

Chapter 6. Income and Subsidy Determinations, Chapter 7. Verifications., Chapter 8. Housing Quality Standards, And Chapter 11. Reexaminations.

AAHC administers the Housing Choice Voucher (HCV) program in accordance with HUD regulation. The HCV Administrative Plan describes the policies used to administer assistance to applicants and participating families. Currently the policies used to administer the program specifically, for Chapter 6. Income and Subsidy Determinations, Chapter 7. Verifications., Chapter 8. Housing Quality Standards, and Chapter 11. Reexaminations are subject to change once HUD has approved the new regulation for HOTMA 102 Income and 104 Assets, NSPIRE (Previously Housing Quality Standards), Reexaminations, and Verifications. HUD has yet to set an official date to implement the new regulation.

Once HUD has determined a date of compliance for implementing HOTMA 102 Income and 104 Assets regulation the PHA will follow policies as outlined in Chapter 6. Income and Subsidy Determinations, Chapter 7. Verifications., Chapter 8. Housing Quality Standards, and Chapter 11. Reexaminations, as applicable upon the HUD's HOTMA 102/104 compliance date.

Chapter 15 – Special Housing Types

AAHC administers Homeownership special housing type voucher assistance. AAHC has amended its policy to allow up to five homeownership voucher per year. AAHC may exceed this number for eligible families as a reasonable accommodation. Preference will be given to elderly, disabled, and Family Self-Sufficiency (FSS) participants who have graduated from the program or who have participated for at least 6 months. Applicants will be selected based on their date and time of application including any preferences.

Chapter 16 – Program Administration: Payment Standard

AAHC will voluntarily adopt the use of Small Area Fair Market Rents (SAFMR) in Washtenaw and Monroe Counties. AAHC will utilize the SAFMRs for both the tenant-based voucher program and the projectbased voucher program for the following zip codes: 48103, 48104, 48105, 48109, 48111, 48174, 48187, and 48188. The payment standard is 110% of the SAFMR. In addition, AAHC will implement the use of

MTW Activity 2. B: Payment Standards Fair Market Rent (FMR) which allows the AAHC to establish a payment standard for up to 120% of the FMR.

Chapter 17 – PROJECT BASED VOUCHER

In accordance with HUD regulation, the AAHC is required to include in its Administrative Plan if the PHA will designate PBV unit specifically for HUD VASH and FUP vouchers. Therefore, AAHC has included this policy in its Administrative Plan. AAHC will award PBVs to projects specifically designated for VASH or FUP assistance through a non-competitive process. AAHC will allow for project-based voucher assistance for units designated for eligible youth to use Family Unification Program assistance. Units that receive FUP PBV assistance is solely for eligible youth.

HUD has amended its regulation regarding PBV units with supportive service. Therefore, the AAHC's new policy states that when supportive services are made available to project -based voucher assisted families, support services may be provided by the owner or another provider and may be provided on site or off-site, however, will be reasonably available to all families. Supportive Services may include but is not limited to: Transportation, medical support, substance use treatment, daily living, financial management, childcare, community building, conflict management, eviction prevention, family services, technology support, work skills development and job training.

Chapter 18: - RAD Project Based Voucher:

In accordance with HUD regulations, families that actually receive services in units where families receive supportive service may be subject to termination if the families fails to complete their supportive service requirements and the AAHC will monitor those families on a quarterly basis.

New HUD regulations allow the AAHC to accept the results of inspections performed by HUD REAC, HOME, or LIHTC programs for initial and periodic inspection. To implement this regulation AAHC must consider the entity perform the REAC, HOME, or LIHTC inspection use a sampling method with selecting units for inspection. HUD regulation requires that if the PHA chooses to accept alternative inspection and the entity uses a sampling method to select units, the sample must include units occupied by families assisted under the HCV or PBV program.

Therefore, AAHC has adopted the policy to accept alternative inspections. The inspections will only be accepted if PBV and HCV units are included in the population of units forming the basis of the sample. The PHA will not utilize inspection results other than from inspections conducted by HUD or for the HOME or LIHTC programs.

AAHC will maintain a community-wide waiting list for its RAD PBV units. The waiting list will consist of the following preferences; disabled, residential, and Continuum of Care (CoC) homeless referrals.

AAHC will apply the alternative requirements applicable to the pre-conversion residents to new admission families. New admission families covered under the waiver are participants under the PBV program, all the family obligations and protections under RAD and PBV apply to the family, the RAD PBV families are subject to the same alternative requirements applicable to the pre-conversion residents, and the unit is subject to all PBV program requirements.

Chapter 19 - SPECIAL VOUCHER TYPE:

FYI - AAHC will administer the Foster Youth Initiative (FYI) program, in partnership with the local Public Child Welfare Agency, Dept of Health and Human Service (DHHS), who is responsible for identifying and

referring eligible youth to the PHA and providing or securing a commitment for the provision of supportive services once youth are admitted to the program.

VASH - If the PBV project is either on the grounds of a VA facility or there are HUD-VASH supportive services provided onsite at the project, the PHA may opt to select a unit occupied by a zero HAP VASH eligible family or admit a zero HAP VASH family to a unit if such unit is made exclusively available to VASH families.

Mainstream -The agency administers Mainstream special voucher type assistance. The AAHC must adopt policies for determining waiting list management of eligible applicants. The agency current maintains one housing choice voucher waiting lists for all applicants, including mainstream. AAHC will amend it policy to maintain two separate waiting list, one for tenant-based voucher assistance and one for applicants eligible for Mainstream voucher assistance. The Mainstream voucher assistance waiting list will not allow any preference for applicants placed on the waiting list. Applicants will be placed on the waiting list using the date and time of application. Eligibility for placement on the waiting list will be determined at the time of application.



Financial Resources:

Federal Sources	Planned (Est.)	Planned Uses
Moving to Work Housing	. ,	HCV and PBV HAP & Admin
Choice Voucher Housing	\$20,125,900	Expenses
Assistance Payments (HAP) &	. , ,	•
Admin Fees		
EHV/VASH/FUP Housing		EHV/VASH/FUP HAP
Choice Voucher Housing	\$2,900,000	
Assistance Payments (HAP)		
EHV/VASH/FUP Admin Fees		EHV/VSH/FUP Admin
	\$300,000	Expenses
Mainstream Voucher		HAP Expenses
Program Housing Assistance	\$2,750,000	
Payments (HAP)		
Mainstream Voucher Admin		Administrative Expenses
Fees	\$290,000	
Family Self-Sufficiency		Family Self-Sufficiency
	\$244,000	Program
Other (Fraud Recovery)		Voucher Programs and
	\$118,000	Central Office
Capital Funds and Operating		
Funds for Turnkey III	\$7,800	Garden Circle (MI064000100)
Other Federal Grants		Affordable Housing
	\$1,000,000	Development
NON-FEDERAL SOURCES (LIST BELOW)		
City of Ann Arbor General		Voucher Administration,
Fund	\$160,000	Central Office
Affordable Housing Millage		Affordable Housing
		Development, Tenant Serv
		ices, and Administrative
	\$6,907,000	Expenses
Mental Health Millage		Tenant Services and
Rebate	\$1,128,000	Administrative Expenses
Other Revenue		Tenant Services and
		Administrative Expenses &
	\$4,593,478	Affordable Housing
	· · ·	Development
Total Resources	\$40,524,178	

Section B.2 and C.1 New Activities

Rental Assistance Demonstration (RAD) Project-Based Vouchers: AAHC has requested a waiver from HUD to accept otherwise eligible Zero Housing Assistance Payment (HAP) families as new admission. HUD requires project-based voucher (PBV) families generate a housing assistance payment during initial leasing. The regulations states that families moving into PBV units must have HAP assistance at the point of move-in. The regulation excluded in-place families for the RAD PBV program. However, PHAs have the option to extend this exclusion in circumstances where low RAD PBV rents may prohibit a significant number of otherwise eligible families on the waiting list from being admitted to the project because they do not require subsidy, and which could consequently create an undue concentration of poverty at the project compared to non-RAD PBV projects. By implementing this regulation AAHC will increase housing opportunities to families and disrupt concentrated poverty at its sites. Upon HUD approval, AAHC will admit otherwise eligible families and to allow the units those families occupy to remain under the HAP contract even if AAHC has not paid HAP for the family in 180 days.

Moving to Work: AAHC was designated as a Moving-To-Work (MTW) agency in January 2022. MTW is a demonstration program for Public Housing Authorities (PHAs) to design strategies to help residents find or increase employment, become financially self-sufficient and increase housing opportunities for low-income households. The MTW program allows the AAHC more flexibility with how voucher program funds are administered. AAHC was selected for the MTW Landlord Incentives Cohort. AAHC will use the exemption allowed under MTW to establish strategies to increase and continue landlord participation on the HCV program and increase the successful lease-up and long-term housing stability of voucher participants. The MTW program objectives are to reduce costs, give households incentives to achieve economic self-sufficiency, and to increase housing choice. The intent is to serve the same number of low-income families as without MTW funding flexibility. The AAHC will continue to serve a mixture of family sizes. The AAHC will ensure that 75% of the families assisted will have incomes at or below 30% of area median income. All assisted units will continue to meet housing quality standards (HQS), or NSPIRE, once implemented by HUD. Finally, the AAHC has establish a reasonable rent policy that will encourage self-sufficiency for participating families.

Garden Circle Turnkey III Section 18 Repositioning: The AAHC owns a single-family home on Garden Circle, Ann Arbor MI, that was acquired through HUD's Turnkey III lease to ownership program under the Public Housing program. The Turnkey III program no longer exists and the families that have lived in this home have not been able to purchase the property., including the current resident. The AAHC will dispose of the property through the Section 18 Demo/Dispo repositioning process. as a small PHA. The property will be sold for \$1 to the Ann Arbor Housing Development Corporation, a Michigan non-profit created by the AAHC. Under the Section 18 process, the existing resident must be re-screened for eligibility under the Voucher Program to qualify for a tenant protection voucher. The AAHC offered the current resident the option to continue living at Garden with a project-based voucher or move with a tenant-based voucher, if qualified. A Section 18 application was submitted to the SAC in June 2024 and the property will be sold to the AAHDC as soon as HUD approves the transaction.

Staff held several meetings with the resident between March 2023 and November 2023. If there are any public housing funds in the fund balance after deducting the reasonable and necessary costs of disposition, the fund balance will be returned to HUD.

Faircloth to RAD: the AAHC has 3 additional units under the Faircloth regulations that can be developed under the RAD conversion process. However, the AAHC will close out its public housing program after Garden is sold.

New Development: The Ann Arbor City Council passes a resolution to support an analysis of cityowned properties to determine if they are financially feasible to develop as affordable housing. The analysis was completed by the AAHC, and 10 properties were identified as good locations for affordable housing development. Each site is unique and will have a separate plan for its development. Properties were analyzed based on zoning, regulatory restrictions, environmental conditions, and eligibility for HUD and LIHTC funding. The AAHC spent 2 years on community engagement to understand the priorities of the community and to start discussing site concepts. The properties are in various stages of development and will be owned by separate legal entities. The City of Ann Arbor passed an affordable housing millage for 1 mil for 20 years, which will raise about \$7 million annually. It is anticipated that the millage will support the development (new construction, acquisition, and renovation) of approximately 1500 new affordable housing units for households up to 60% of the Area Median Income (AMI). The millage also allows for up to 20% of the funds to be used for tenant supportive services. The millage is a key component of the development strategy for the 10 city-owned properties to provide gap financing and tenants service funding.

Section B.6 Progress Report

Please see the 4 goals from FY25 – FY29 Plan with a progress report for each goal

1) Complete Redevelopment of all public housing units to Project Based Vouchers through the Rental Assistance Demonstration (RAD) project. Close-out Public Housing Program.

The AAHC was approved by HUD to redevelop all its public housing to project-based vouchers under the RAD program. Phases 1, 2, 3, 4, & 5 are completed. The single-family Turnkey III home on Garden Circle is the only property HUD has not yet approved for conversion.

2) Preservation of RAD-converted properties

Through the RAD conversion program, AAHC demolished and built new housing at 3 former public housing properties. A total of 58 new apartments were added through the RAD conversion process. Phase 1, Miller Manor, was redeveloped with three (3) additional apartments. Phase 3 at N. Maple added 23 apartments. Phase 4 at Lower Platt (now known as Creekside Court) added 28 apartments and White/State/Henry (now known as State Crossing) added 4 apartments.

Continue to reinvest in existing RAD-converted properties to preserve this affordable housing.

3) Project-Based Voucher:

Increase the number of Project-Based Vouchers in the City of Ann Arbor and other communities in Washtenaw County that have a strong economic base and public transportation. AAHC projects that approximately 200 vouchers will be converted to project-based vouchers by FY29.

- a. <u>Statement of need Consistent to PHA Plan:</u> AAHC will project-base up to 30% of the AAHC's budget authority to de-concentrate poverty and expand housing and economic opportunities for very low-income, homeless, and special needs households in the City of Ann Arbor and other high opportunity areas in Washtenaw County. The AAHC prioritizes PBV on Permanent Supportive Housing units. These activities are consistent with the AAHC's 5-year and Annual Plan as well as AAHC's mission.
- 4) Increase supportive housing for residents with complex needs spanning from homelessness, mental illness, substance use disorders, and/or other physical/mental disabilities.
 - a. Increase support services for tenants in affordable housing and voucher program
 - b. Through community partnerships
 - c. Additional funding sources
 - d. Continue to work with partners and provide support to eligible families

Continuum of Care (CoC)

The AAHC is a board member of the Continuum of Care and will continue to partner with other CoC agencies to provide housing and services to homeless households. The AAHC currently has a partnership with Avalon Housing and Ozone House to provided housing and services to chronically homeless individuals and families through the HUD Continuum of Care program. A minimum of 59 of these households will be housed at AAHC properties and Avalon and Ozone House provide on-site services. These funds have enabled Avalon to provide 24/7 services at Miller Manor.

Support Service HCV Eviction Prevention

The AAHC is partnering with SOS to provide eviction prevention and voucher program termination prevention for AAHC voucher program participants. The coordinated support service allows assist families to lease up in Ann Arbor and resolve landlord/tenant issues such as securing funds to avoid eviction and/or assistance with securing funds for outstanding utility bills and were able to retain their housing. AAHC will continue contracting services with SOS to provide voucher families assistance in maintaining their assistance.

Support Service On-site PBV

The AAHC contracts with Avalon Housing, Peace Neighborhood Center, Community Action Network, Ozone House, and Huron Valley PACE to provide on-site services for tenants at properties owned and managed by the AAHC and its affiliated legal entities.

Additional Voucher Support Services

The AAHC is partnering with Avalon Housing and Michigan Ability Partners to assist AAHC voucher waitlist applicants lease up successfully and to provide ongoing support services.

Also, AAHC administers the Rising Hope program. Rising Hope assist housing choice voucher participants who have been impacted by the criminal justice system. Participants receive supportive services aimed to help families maintain their housing assistance. AAHC partners with several agencies to ensure family's needs are met.

Family Unification Program (FUP)

The AAHC is partnering with the Michigan Department of Health and Human Services (MDHHS), Washtenaw County Continuum of Care (CoC), and Ozone House to provide housing assistance to 32 families for the HCV Family Unification Program. AAHC continues to provide housing to eligible families.

The Family Unification Program (FUP) is a program under which Housing Choice Vouchers (HCVs) are provided to two different populations: Families for whom the lack of adequate housing is a primary factor in: the imminent placement of the family's child or children in out-of-home care, or the delay in the discharge of the child or children to the family from out-of-home care. In addition, Eligible youths who have attained at least 18 years and not more than 24 years of age and who have left foster care, or will leave foster care within 90 days, and is homeless or is at risk of becoming homeless at age 16 or older.

In addition to rental assistance, supportive services must be provided by the MDHHS to FUP youths for the entire 18 months in which the youth participate in the program; examples of the skills targeted by these services include money management skills, job preparation, educational counseling, and proper nutrition and meal preparation.

Non-Elderly Disabled Mainstream Voucher (NED)

The AAHC is partnering with 11 agencies to administer the NED Voucher program, all of whom serve persons with disabilities as a cornerstone of their non-profit mission or public agency purpose. AAHC administers 251 Mainstream vouchers.

NED HCVs enables non-elderly disabled families to lease affordable private housing of their choice. NED vouchers also assist persons with disabilities who often face difficulties in locating suitable and accessible housing on the private market. The target population for the NED program are any household that includes one or more non-elderly person with disabilities.

In addition, eligible families included non-elderly persons with disabilities who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, currently experiencing homelessness, or those at risk of experiencing homelessness.

Emergency Housing Vouchers

AAHC received an award for the Emergency Housing Vouchers (EHV) effective July 1, 2021. The Emergency Housing Voucher (EHV) program is available through the American Rescue Plan Act (ARPA). Through EHV, AAHC assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were

recently homeless or have a high risk of housing instability. AAHC currently administers 26 EHV to eligible families.

AAHC works with the CoC and its other homeless services/victim services referral partners in determining which activities it will undertake in support of EHVs participants. Activities such as housing search assistance, assistance with security deposit, utility deposit, rental application, holding fees, and other related uses are intended to prevent and respond to housing instability.

Foster Youth Initiative Vouchers

AAHC received an award of 6 *Foster Youth Initiative Vouchers (FYI)* effective October 16, 2024.

Additional Vouchers

AAHC applied for 6 addition FUP vouchers in October 2024. Although, the award has not been announced we are confident that the application will be approved. On January 6, 2025, AAHC was awarded 41 vouchers for the administer for eligible VASH families.

HUD HCV Administrative Fee Support

Due to a competitive rental market around the country, it's increasingly becoming necessary to help families lease units. As a result, HUD revisited its current guidance on the eligible uses of administrative fees allowing PHA's to expanding such activities to cover costs that encourage housing stability for participants. To ensure success, AAHC administers funds directly to our partners that provide services to participating families that fit their specific needs.

Administrative activities also include housing search assistance activities such as premove counseling, helping a family identify and visit potentially available units during their housing search, helping a family find a unit that meets the household's disabilityrelated needs, providing transportation and directions, and assisting with the completion of rental applications. These activities also include post-lease up activities often related to housing search assistance efforts, such as post-move counseling and landlord/tenant mediation. These activities cover HCV owner recruitment and outreach activities, including the costs associated with materials or webpages specifically geared to owners, as well as landlord liaison staff and associated expenses.

City of Ann Arbor General Fund Support

The City of Ann Arbor provides annual funding for resident supportive services through a variety of programs contracted to local non-profit service providers.

Section B.7 Resident Advisory Board

The Resident Advisory Board (RAB): December 18, 2024, at 6:00 pm

This meeting focused on the AAHC's Annual Plan and Agency Five Year Plan. Other topics included: MTW Supplement Plan, the Final Rule implementing Sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) regulation changes for future adoption.

ATTENDEES: Weneshia Brand; no other attendees

DISCUSSION:

HCV Owner Trash and Administrative Fees

AAHC is a participant in Moving To Work Cohort #4— Landlord Incentives. Participation in this cohort provides AAHC the opportunity to adopt policies that incentivize landlord participation in the Section 8 Voucher program. AAHC plans to provide damage loss payments, signing bonuses, and vacancy loss payments to landlords that rent to Section 8 Voucher participants. AAHC also plans to assist new applicants' security deposits and paying application fees. In addition, AAHC plans to include trash fees in its utility allowance calculations.

Interim Reexaminations:

Fewer Interim Reexaminations: HOTMA creates a 10% adjusted income increase/decrease threshold for conducting Interim Reexaminations, and in most cases requires that increases in earned income are not processed until the next Annual Reexamination, allowing families to keep more of their earnings before receiving a rent increase. The new requirements should lead to fewer Interim Reexaminations overall, alleviating burden for both participants and PHAs.

Deductions:

\$525 is deducted from the annual income of elderly or disabled households. Increased Standard Deduction for Elderly/Disabled Households: HOTMA increases standard deductions for families with a head, co-head, or spouse who is elderly or a person with a disability.

Elderly or Disabled households who spend over 10% of their annual income on out-ofpocket health care and medical cost will have expenses deducted from their annual income. Threshold for Claiming Medical/Disability Expenses Increased: HOTMA increases the allowance for unreimbursed health and medical care expenses from 3% of annual income to 10%, phased-in over two years.

Asset Limits:

Assisted families are allowed to have up to \$50,000 in assets and a higher threshold for Imputing Asset Income: HOTMA raises the imputed asset threshold from \$5,000 to \$50,000 for 2024, and \$51,600 for 2025, incentivizing families to build wealth without imputing income on those assets.

Assisted families are allowed to self-certify assets under \$50,000: HOTMA allows self-certification of net assets if estimated to be at or below \$50,000. This will be a time-savings for families and lower administrative burden for PHAs recertifying income.

Asset Limits and Eligibility:

Families who have \$100,000 or more in assets or own a home are not eligible for housing assistance. HOTMA imposes a \$100,000 asset limit for eligibility and continued

assistance. Families are also ineligible for assistance if they own real property suitable for occupancy. PHAs have the option of delaying enforcement/termination for up to six months if the family is over the asset threshold at the time of annual reexamination.

Cross-Cutting

Adjustments for Inflation: Deductions and the asset limitation will be adjusted for inflation annually, ensuring that deductions do not lose value over time and that families are able to build more wealth without losing program assistance. The current deduction amounts have never been adjusted.

Earned Income Disallowance:

AAHC will not longer offer the mandatory EID program. HOTMA removed the statutory authority for the EID. The EID is available only to families that are eligible for and participating on the program as of December 31, 2023, or before; no new families may be added on or after January 1, 2024. If a family is receiving the EID prior to or on the effective date of December 31, 2023, they are entitled to the full amount of the benefit for a full 24-month period. No family will still be receiving the EID after December 31, 2025. The EID will sunset on January 1, 2026.

Resident Advisory Board Discussion: None

OTHER RESIDENT INPUT:

Section B.7 Public Meeting:

The Public Meeting scheduled for January 15, 2025

This public meeting focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program Supplemental Plan, Hardship Policy, Rent Reform, Agency Specific Waivers, and Safe Habor.

ATTENDEES:

DISCUSSION:

CHALLENGED ELEMENTS TO PLAN: None