



# Lakeland Housing Authority Moving to Work (MTW) Agency Plan Amendment 2024

<b>Annual PHA Plan (MTW Agency)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires: 03/31/2024</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

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

**Definitions.**

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

A.	PHA Information.																				
A.1	<p><b>PHA Name:</b> <u>The Housing Authority of the City of Lakeland</u> <b>PHA Code:</b> <u>FL011</u>  <b>PHA Type:</b> <input checked="" type="checkbox"/> Moving to Work PHA <input type="checkbox"/> Troubled PHA  <b>PHA Plan for Fiscal Year Beginning:</b> 01/01/2024  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units</b> <u>255</u> <b>Number of Housing Choice Vouchers (HCVs) Total Combined Units/Vouchers</b> <u>1626</u>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>The Annual PHA Plan will be available at the following locations:</p> <p>Housing Authority of the City of Lakeland 430 Hartsell Avenue Lakeland, FL 33815</p> <p>All the properties and locations within the Housing Authority of the City of Lakeland portfolio.</p> <p>Housing Authority of the City of Lakeland’s website: <a href="https://lakelandhousing.org/">https://lakelandhousing.org/</a></p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below) <b>Not applicable.</b></p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:											
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Lead PHA:																					

<b>B.</b>	<b>Plan Elements</b>					
<b>B.0 Financial Resources: Planned Sources and uses</b>						
This section lists the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Revision: Updated table of financial sources and uses below.						
<b>Sources</b>	<b>Planned \$</b>			<b>Planned Uses</b>		
<b>1. Federal Grants (FY2023 grants)</b>						
a) Public Housing Operating Fund	\$1,057,518			PH Development/Modernization/ Job Readiness		
b) Available Public Housing Capital Fund	\$5,643,907 minus any obligated funds			Modernization and Development		
c) Annual Contributions for Section 8 Tenant-Based Assistance	\$15,597,758			Voucher, VASH, M5, TP, FY, etc....		
d) Resident Opportunity and Self-Sufficiency Grants	\$198,000			3 Year grant		
<b>Other Federal Grants (list below)</b>						
Low Income Housing Tax Credits (SAIL)	\$0.00					
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>						
<b>CFP 2024</b>	\$889,780			Modernization and PH Development		
CFP 2023 (Estimated)	\$889,780			Modernization and PH Development		
CFP 2022	\$889,780			Modernization and PH Development		
CFP 2021	\$1,085,963			Modernization and PH Development		
CFP 2020	\$1,115,701			Modernization and PH Development		
CFP 2019	\$971,182			Modernization and PH Development		
CFP 2018	\$934,727			Modernization and PH Development		
CFP 2017	\$608,069			Modernization and PH Development		
URP/HOPE VI	\$0.00			Modernization/ PH Development		
DOL Youth Build	\$1,500,000			Youth Build Program		
FSS Grant (Sec.8 HCV and Public Housing combined)	\$135,000			Resident Services		
<b>3. Public Housing Dwelling Rental Income</b>	\$699,444			PH		
<b>4. Other income (list below)</b>						
Investment Income	\$2,600,000 Unaudited			PH		
<b>Total resources</b>	\$28,495,641					

<p><b>B.1</b></p>	<p>See the MTW Supplement for more information.</p>
<p><b>B.2</b></p>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods (<b>Closing HOPE VI in progress</b>)</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p><b>Section B.2 - HUD-50075: New Activities</b>  LHA became a Moving to work agency in 2022, please see the MTW Agency Plan amendment attached.</p> <p>LHA goal is to transform its entire public housing portfolio into mixed-income communities over the next 2 to 40 years, in an effort to reposition the agencies' public housing assets into better performing developments that are competitive in the marketplace as well as improve their physical and social conditions.</p> <p>For over twenty-five years LHA's Development Department has been responsible for creating economic development opportunities in the City of Lakeland as well as redeveloping challenged neighborhoods that have not been invested in and neglected for some time. LHA and/or its subsidiary entity(s) plans to either partner with other developers or self-develop its properties using HUD's mixed- finance approach.</p> <p>LHA envisions a range of options that will be employed to achieve its goal to transform its portfolio which may include but not be limited to: modernization of existing public housing units; demolition of selected units and construction of new units; introduction of market rate and for-sale units; Rental Assistance Demonstration (RAD) Program: acquisition and development of new units in, around and outside of LHA properties; and wholesale redevelopment of its public housing communities. LHA plans to convert all Public Housing ACC Faircloth units to RAD Project Based Vouchers.</p> <p>LHA was granted Low Income Housing Tax Credits to developed and built a 100-unit's community (Phase 1) the community is currently fully operational and occupied; this community has replaced approximately 25 units of existing Public Housing units located within the West Lake Apartments community (AMP-1). Additionally, LHA was granted additional Low-Income Housing Tax Credits (LIHTC) for Phase 2 to develop 132 units, the community is currently fully operational and occupied, 64 existing Public Housing units were disposed and demolished. The Agency is currently working on Phase 3 to replace the remaining 34 Public Housing units located within the West Lake Apartments community, all 34 units will be disposed and demolished. More specifically LHA plans to submit applications for the next rounds of the Florida Housing Finance Corporation LIHTC application season, for our Public Housing Developments in the coming year(s).</p> <p>To expedite the closure of its 10 plus year old HOPE VI Grant, LHA requested HUD to amend the Revitalization Plan and associated budget revisions as required. LHA is working with its auditing and finance firms on the following options for closeout of the grant:</p> <ul style="list-style-type: none"> <li>• Micro-Cottages: The authority has developed and built a 48 affordable housing units' community and a community building with a combination of RHF funds from FY 2009 – 2014 and/or HOPE VI funds. The community is fully operational and 100% occupied.</li> <li>• Cecil Gober, Renaissance and Carrington Place Modernization: These three communities must go through a modernization process. The GPNA and PNA that was performed for the sites supports modernization of the sites. As part of the modernization, LHA is seeking to correct deficiencies outlined by the GPNA and a most recent PNA as well as reconfigure the units. The agency has secured a HUD approved loan to start the remedial modernization process for Renaissance.</li> <li>• Renaissance 15 lots: LHA is working to build additional Low-Income Housing to help with the demand for affordable housing.</li> <li>• West Lake Apartments (Third Phase): LHA will be submitting a mixed-finance application/proposal to HUD and will pursue the construction of new Public Housing/Mixed Financed units using Low Income Housing Tax Credits and Public Housing funds earmarked for the development of Affordable Housing. The First and Second Phases are fully operational and occupied.</li> </ul> <p>Any balance of remaining CFP funds received to date, along with future CFP grant funding, will be accumulated and used for the potential redevelopment of LHA's other public housing communities and/or for other projects under the mixed- finance development approach. Additional acquisitions of vacant land or other</p>

existing rental properties, adjacent to current public housing sites may also be initiated, subject to submission and approval by HUD of the appropriate development proposals. Note that “Forced Labor” will be our first choice when performing any construction, repairs and/or replacement of systems.

Other mixed-finance transactions (via acquisition or new construction or both) may be proposed later in the Plan commensurate with the LHA Strategic Plan. Financing may include use of regular Capital Funds and/or HUD’s Capital Fund Financing Program (CFFP) and/or private financing and/or any other available financing or loan program. CFFP/RAD involves borrowing against future flow of annual Capital Funds.

LHA plans to pursue public housing/mixed financed/market development activities and will utilize its Development Department and/or other subsidiary entities for development, financing, and the formation of a variety of ownership structures as well as utilize its management entity for the operation of public and non-public housing programs.

The Authority intends to use Capital Funds and other public and private funds to redevelop existing family and elderly developments. LHA will either self-develop or partner with a master developer for Westlake Apartments or other (s) site (s) and conduct a community engagement process to arrive at a master plan for redevelopment.

LHA will also start self-developing and operating affordable housing. Some of the proposed self –developing project will either be located on the 10.56-acre site located on W. 10th Street (120 affordable condos or townhomes will be built for sale or for rent depending on the type of financing), the 4 acres site within the downtown area of the city of Lakeland, and other sites that are currently under review for future development. The Housing Authority obtained SAC HUD Approval to sell the 17.06-acre site at Hunter field PUD (Arbor Manor), sale closed on June 17, 2022. The HA is researching building additional affordable housing for sale or rent at the John Wright Homes or Washington Ridge 15 vacant lots or any other available site. LHA also intends to use Capital Funds and other funds to acquire and redevelop properties in and around its public housing communities. LHA may also use Capital Funds to purchase affordable housing within the Polk County Area.

**Demolition and/or Disposition and/or Development/Projects (New and existing)**

This section describes whether HUD-approved applications by LHA to demolish or dispose (sell) public housing projects owned by LHA and subject to Annual Contributions Contracts (ACCs), or pending applications for demolition or disposition, have changed during the current plan year.

In such cases, LHA would be required to describe the housing and the number of affected units for which it will apply or has pending for demolition or disposition; and provide a projected timetable for the demolition or disposition. Information on planned and pending demolition and/or disposition efforts is provided in the following tables.

LHA has been working with residents and the City of Lakeland to define a strategy for the Cecil Gober rehabilitation project, Arbor Manor sale, the West Lake Apartments disposition, the Section 8 Homeownership program, the 10<sup>th</sup> Street project, the Renaissance at Washington Ridge rehabilitation project, the Dakota rehabilitation project, (other future projects) and the Section 32 Public Housing Homeownership program. The Section 32 disposition plan for the 12 houses at Hampton Hills was approved by the Special Application Center in November 2013. The implementing agreement was executed in March 2014. LHA will amend the agreement as needed to implement the strategy. Individual houses within the Hampton Hills community may be sold to qualified residents, retained as public housing, or sold to third parties in accordance with the strategy and HUD regulations. Note: All the houses within the Hampton Hills community were sold, the project is considered closed.

LHA will include the vacant lots in this process as well. Specifically, LHA sold the 17.3-acre tract within the Hunter field and plans to develop the land located on the 10.56-acre site on W. 10th Street in house. The sales or cash proceeds from both properties will be used to develop, acquire, or modernize affordable housing units at other properties owned and/or controlled by LHA or its affiliates.

Table #1 Demolition/Disposition/Modernization Activity Description

- 1a. Development name: Auburndale Florida
- 1b. Development (project) number: FL01100001
- 2. Activity type: Disposition N/A
- 3. Application status (select one)  
Approved N/A  
Submitted, under development  
Planned application
- 4. Date application approved, submitted, or planned for submission: 12/2023
- 5. Number of units affected: 100
- 6. Coverage of action (select one)  
Part of the development  
Total development: X
- 7. Timeline for activity: 48 months  
a. Actual or projected start date of activity: under development

Table #2 Demolition/Disposition/Modernization Activity Description

- 1a. Development name: West Lake Apartments (Phase 1 completed) (Phase 2 completed) (Phase 3 relocation completed)
- 1b. Development (project) number: FL01100001
- 2. Activity type: Demolition  
Disposition: X
- 3. Application status (select one) Approved  
Submitted, (pending approval for Phase 3)  
Planned application X
- 4. Date application **approved, submitted, or planned for submission: Phase one- 4/2017, Phase two- 04/2018, Phase three- 2019**
- 5. Number of units affected: 120
- 6. Coverage of action (select one)  
Part of the development  
Total development: X
- 7. Timeline for activity:  
a. Actual or projected start date of activity: 1/01/2011  
b. Projected end date of activity: 12/31/2024

Note\*: SAIL LIHTC Approved Phase 1 and 2

Table #3 Modernization Activity Description

- 1a. Development name: Cecil Gober Villas
  - 1b. Development (project) number: FL01100001
  - 2. Activity type: Modernization: X
  - 3. Application status (select one) Approved  
Submitted, pending approval.  
Planned application: X
  - 4. Date application approved, submitted, or planned for submission: 12/1/2015
  - 5. Number of units affected: 37
  - 6. Coverage of action (select one)  
Part of the development  
Total development: X
  - 7. Timeline for activity:
    - a. Actual or projected start date of activity: 12/01/2015
    - b. Projected end date of activity: 12/31/2023
- Note\*: Capital Funds will be used.

Table #4 Demolition/Disposition/Modernization Activity Description

- 1a. Development name: Arbor Manor (Hunter field PUD)
  - 1b. Development (project) number: FL01100001
  - 2. Activity type: Disposition: X
  - 3. Application status (select one) Approved Submitted, pending approval: X Planned application
  - 4. Date application approved, submitted, or **planned for submission**: 2020-2023
  - 5. Number of units affected: 0
  - 6. Coverage of action (select one)  
Part of the development  
Total development: X
  - 7. Timeline for activity:
    - a. Actual or projected start date of activity: 2020
    - b. Projected end date of activity: 06/17/2022
- Note\*: Land sold.

Table #5 Demolition/Disposition/Modernization Activity Description

- 1a. Development name: 10th Street in front of Colton Meadow Apartments, Lakeland, Polk County, Florida
  - 1b. Development (project) number: FL01100001
  - 2. Activity type: Disposition: X
  - 3. Application status (select one) Approved  
Submitted, pending approval.  
Planned application: X.
  - 4. Date application approved, submitted, or **planned for submission**: 2020-2024
  - 5. Number of units affected: 0
  - 6. Coverage of action (select one)  
Part of the development  
Total development: X
  - 7. Timeline for activity:
    - a. Actual or projected start date of activity: 2021
    - b. Projected end date of activity: 12/31/2022-24
- Note\*: Planning to build up to 120+ Affordable Condos/Townhomes for sale or rent depending on the funding or loan conditions.

Table #6 Demolition/Disposition/Modernization Activity Description

- 1a. Development name: 15 Vacant Parcels at Washington Park, FL29P011003, HOPE VI Site
  - 1b. Development (project) number: FL01100003
  - 2. Activity type: Disposition: X
  - 3. Application status (select one) Approved  
Submitted, pending approval: X Planned application:
  - 4. Date application approved, submitted, or planned for submission: 11/12/2014
  - 5. Number of units affected: 0
  - 6. Coverage of action (select one)  
Part of the development  
Total development: X
  - 7. Timeline for activity:
    - a. Actual or projected start date of activity: 2022
    - b. Projected end date of activity: 12/31/2022-25
- Note\*: Funding pending

Table #7 Demolition/Disposition/Modernization Activity Description

- 1a. Development name: Vacant Parcels at John Wright Homes
- 1b. Development (project) number: FL01100001
- 2. Activity type: Disposition: X
- 3. Application status (select one) Approved  
Submitted, pending approval: **X Planned application**:
- 4. Date application approved, submitted, or planned for submission: 2024
- 5. Number of units affected: 0

6. Coverage of action (select one)

Part of the development

Total development: X

7. Timeline for activity:

a. Actual or projected start date of activity: 2024

b. Projected end date of activity: 12/31/2025

Note\*: Funding pending

Table #8 Demolition/Disposition/Modernization Activity Description

1a. Development name: Dakota Park Apartments

1b. Development (project) number: FL01100002

2. Activity type: Demolition-Disposition: X

3. Application status (select one) Approved

Submitted, pending approval: **X Planned application:**

4. Date application approved, submitted, or planned for submission: 2023

5. Number of units affected: 20 or 40 depending on funding or financing type.

6. Coverage of action (select one)

Part of the development

Total development: X

7. Timeline for activity:

a. Actual or projected start date of activity: 2022

b. Projected end date of activity: 12/31/2024

Note\*: Funding pending, considering RAD conversion.

Table #9 Demolition/Disposition/Modernization Activity Description

1a. Development name: Renaissance at Washington Ridge

1b. Development (project) number: FL01100003

2. Activity type: Demolition-Disposition: X

3. Application status (select one) Approved

Submitted, pending approval: **X Planned application:**

4. Date application approved, submitted, or planned for submission: 2021

5. Number of units affected: 108 or 196 depending on funding or financing type.

6. Coverage of action (select one)

Part of the development

Total development: X

7. Timeline for activity:

a. Actual or projected start date of activity: 2021

b. Projected end date of activity: 12/31/2023

Note\*: Funding pending, considering RAD conversion

Table #10 Demolition/Disposition/Modernization Activity Description

1a. Development name: 4 Acres Downtown

1b. Development (project) number: FL01100001

2. Activity type: Demolition-Disposition: X

3. Application status (select one) Approved

Submitted, pending approval: **X Planned application:**

4. Date application approved, submitted, or planned for submission: 2022

5. Number of units affected: 100 to 120 depending on funding or financing type.

6. Coverage of action (select one)

Part of the development

Total development: X

7. Timeline for activity:

a. Actual or projected start date of activity: 2021

b. Projected end date of activity: 12/31/2023

Note\*: Funding pending

Table #11 Demolition/Disposition/Modernization Activity Description

1a. Development name: City of Mulberry Project-Eddie Woodard

1b. Development (project) number: FL01100001

2. Activity type: Demolition-Disposition: X

3. Application status (select one) Approved

Submitted, pending approval: **X Planned application:**

4. Date application approved, submitted, or planned for submission: 2022

5. Number of units affected: 92 to 96 with up to 20 Project Based Vouchers and LIHTC.

6. Coverage of action (select one)

Part of the development

Total development: X

7. Timeline for activity:

a. Actual or projected start date of activity: 2022

b. Projected end date of activity: 12/31/2023

Note\*: Funding pending

## Project-Based Vouchers

This section describes the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

A PHA can use up to 50% due to the MTW designation percent (20 percent of the total number of vouchers, note that any project based vouchers used within a 62 and over senior community are excluded from the mandatory 20 percent pursuant HUD rules and regulations) of its authorized voucher units to project-base units in a specific project if the owner agrees to either rehabilitate or construct the units, or the owner agrees to set-aside a portion of the units in an existing development. In certain cases, the PHA may use an additional 10 percent of its authorized voucher units for PBV assistance if units serving homeless; veterans; providing supportive housing for elderly or disabled; or located in areas where vouchers are difficult to use.

When funding becomes available, the Authority plans to use some of its vouchers under the Project Based Vouchers (PBV) option, as described at 24 CFR Part 983. This may be done in one of two ways.

First, LHA may issue a Request for Proposals from owners wishing to participate in the program. The criteria and procedures for such selections will be described in the RFP and in the LHA's Section 8 Administrative Plan.

Second, LHA may make non-competitive selections of owners whose projects included a competitive selection of proposals, such as housing assisted under a federal, state, or local government housing assistance, community development, or supportive services program.

The Authority may also submit a proposal under an RFP for units in its public housing portfolio or a property it may acquire under its —redevelopment authority for this purpose. The use of PBV is consistent with the overall PHA Plan, which is encouraging the development of affordable mixed-use, mixed-income housing particularly in consort with broader neighborhood revitalization efforts such as the Westlake project and other sites.

LHA's PBV criteria and procedures will propose the use of these resources in ways that facilitate achievement of its overall housing goals in general and the mobilization of potential relocation resources, to address the housing needs of LHA families at developments slated to be redeveloped, including, but not limited to, the Cecil Gober Villas, Dakota Park (Carrington Place) and Westlake Apartments projects and/or other similar communities and situations.

Under the HUD Asset Management Model, some of LHA's developments are not financially sustainable because insufficient Annual Contract Contribution (ACC) subsidy is received from HUD to support their operations. LHA is currently evaluating options for restructuring the properties; possibly seeking to convert these properties to Project-based Section 8 communities through RAD.

LHA may project-base units or convert all of LHA's communities to RAD including but not limited to Carrington Place, John Wright, Cecil Gober, Twin Lakes Estates, any new development and Renaissance at Washington Ridge Development project (s).

LHA utilized 80 project-based vouchers within the final phase of the West Lake Apartments Low Income Housing Tax Credit project and 99 for the Manor at West Bartow this 179 PBV units are exempted from the total number of units calculated using the maximum 20% of the PHA Consolidated Annual Contract pursuant HUD rules and regulations as these units are set aside for Elderly and Disabled families. 18 PBV are being utilized at Villas of Lake Bonnet for families. The PHA Consolidated Annual Contract counts with 1656 Section 8 units, the PHA can convert up to 20% (330 Vouchers) of these units into PBV. Additionally, another 10% (165) can be converted following the below requirements. Based on the before mentioned Project Based Vouchers numbers the PHA vouchers conversion availability is 298.

Project-Based Units [FR Notice 1/18/17; Notice PIH 2017-21] The PHA may project-base an additional 10 percent of its units above the 20 percent program limit. The units may be distributed among one, all, or a combination of the categories if the total number of units does not exceed the 10 percent cap.

Units qualify under this exception if the units:

- Are specifically made available to house individuals and families that meet the definition of homeless.
- Are specifically made available to house families that are comprised of or include a veteran. - Veteran means an individual who has served in the United States Armed Forces.
- Provide supportive housing to persons with disabilities or elderly persons as defined in 24CFR 5.403.
- Are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent Census.

Notice PIH 2015-05 (Project-Based Voucher (PBV) Guidance):

a. "Section I – Timely Reporting of the Family Report (form HUD-50058 and form HUD 50058 MTW) into the Inventory Management System/Public Indian Housing Information Center (IMS/PIC) and Timely Submission into the Voucher Management System (VMS) for Project Based Vouchers" is adopted with updates to VMS reporting per page 6 of 67 VMS User's Manual release 8.9.0.0 (April 2016). (Appendix III)

b. "Section II – Maximum Amount of PBV Assistance (20 Percent Limit) in the PBV Program and PHA Submission requirements under 24 CFR 983.6(d)" is superseded by HOTMA, under which a PHA may project base up to 20 percent of its Consolidated Annual Contributions Contract authorized units, instead of 20 percent of its voucher budget authority. This notice revises the requirements for PHA notification to HUD of the intent to project-base.

Notice PIH 2015-10 (Project-Basing HUD-Veterans Affairs Supportive Housing (VASH) Vouchers. HOTMA authorizes PHAs to project-base Family Unification Program (FUP) and HUD-Veterans Affairs Supportive Housing (VASH) vouchers without requiring additional HUD approval. Prior to HOTMA, PHAs were prohibited from project-basing vouchers awarded for FUP. HUD-VASH vouchers could be project-based but required HUD review and approval in accordance with Notice PIH 2015-10 (this applied to HUDVASH vouchers the PHA chose to project-base and not to HUD-VASH units awarded under a HUD-VASH PBV allocation as described in Attachment F of this notice). HOTMA authorizes a PHA to attach PBV assistance to not more than 20 percent of its ACC authorized units instead of 20 percent of its voucher budget authority. For purposes of this provision, the term "authorized units" means the number of units under the PHA's current ACC.



**B.3**

**Progress Report.**

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA Annual Plan.

The Housing Authority of the City of Lakeland is meeting its Mission to provide quality, affordable housing, and self-sufficiency opportunities in an effective and professional manner by passing every HUD inspection/audit and staying in compliance with HUD, State and Local rules and regulations. Additionally, we are actively working on meeting our goals as follow:

MTW Goal: is to assist every family participating on any and all housing programs achieved self-sufficiency.

Goal #1: Increase the number of affordable housing units by at least 50%. We were able to build 100 Senior units for PHASE 1 of the Twin Lakes Development and PHASE 2 with 132 units of affordable housing. PHASE 3 is seeking funding to add another 78 to 82 units. The Williamstown Community added 48 Public Housing) was approved, built, and is now fully occupied. The agency is planning to develop 120 condos or townhomes for sale or rent on the 10<sup>th</sup> Street site and is selling the mixed-use land at the Arbor Manor site, the proceeds will be used to continue developing more affordable housing. We are in the planning stages of developing other communities that will be named soon.

Goal #2: Maintain and/or obtain the "High Performer" status in Public Housing and Section 8. We were designated a Standard Performer Agency for Public Housing and High Performer Agency for the Housing Choice Voucher Program on the most recent evaluation.

Maintain a public housing vacancy rate of 5% or less. LHA has been able to maintain the vacancy at or below 3%. Maintain an average work order response time of less than three days. Collect at least 95% of the rent and other charges excluding fraud recovery and major tenant abuse due to LHA. Reduce utility usage (including water) by 25% by December 31, 2027.

Maintain a Section 8 lease-up rate of at least 98% while not exceeding HUD limitations. Continue and improve task tracking / management by objectives. Enhance internal operations to reduce costs, improve efficiencies, and become even more effective and professional.

Goal #3: Maintain and improve our public image through enhanced communication, coordination, and accountability with outside entities, among the staff and with residents.

Goal #4: Be the premier innovative and effective affordable housing provider in Florida.

Apply for additional housing choice vouchers as they become available.

Seek out new funding opportunities as they become available including but not limited to LIHTC. Develop, rehab and/or build new communities in all LHA owned land or parcels and re-develop the West Lake Apartments community, John Wright Homes, Carrington Place, Renaissance at Washington Ridge and other future projects to be name in the near future.

Implement and run a successful Section 8 Homeownership program.

Incorporate non-traditional entrepreneurial methods and practices that positively impact affordable housing in LHA's jurisdiction. Incorporate financially feasible Green and Sustainability Best Practices in all future developments. Obtain at least \$10 million in grants and/or leveraging from all sources by December 31, 2023.

Goal #5: Increase and encourage the self-sufficiency efforts of all residents. (On-going)

Increase the usage of LHA educational and computer literacy programs by 25% by December 31, 2023.  
Substantially increase the number of LHA seniors and people with disabilities using LHA sponsored programs by December 31, 2023.

Goal #6: Maintain a high level of employee relations and morale. (On-going)

Enhance lines of communications through staff meetings and other necessary internal communications to provide updates and progress reports about agency activities.

Continue to reward performance through the timely implementation of a performance management system and the incentive pay program.

Encourage and support staff partaking in training and continuing education opportunities to the greatest degree possible within funding constraints.

Conduct an annual employee satisfaction survey and update the salary charts.

The Housing Authority of the City of Lakeland continues to comply with the Violence Against Women Act ("VAWA") which protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation. The Housing Authority of the City of Lakeland applies the VAWA policy to all programs funded by the U.S. Department of Housing and Urban Development.

<p><b>B.4</b></p>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>The 5-year action plan for 2018 to 2022 was approved by HUD on 06/20/2019. The new 5-year 2023 to 2027 plan will be entered into EPIC for HUD approval. Forced account will be used as a way of saving funds while servicing the communities and making the necessary maintenance repairs and/or modernization work including but not limited to capital items, replacement of systems, etc....</p>
<p><b>B.5</b></p>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
<p><b>C.1</b></p>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(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.</p>
<p><b>C.2</b></p>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p><b>C.3</b></p>	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p><b>C.4</b></p>	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
<p><b>C.5</b></p>	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A  <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>

<b>D.</b>	<b>Affirmatively Furthering Fair Housing (AFFH).</b>		
<b>D.1</b>	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" data-bbox="180 459 1451 997"> <tr> <td data-bbox="180 459 1451 499"><b>Fair Housing Goal:</b></td> </tr> <tr> <td data-bbox="180 499 1451 997"> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>The HACL is committed to affirmatively furthering fair housing by:</p> <ul style="list-style-type: none"> <li>● Conducting an analysis to identify impediments to fair housing choice;</li> <li>● Taking appropriate actions to overcome the effects of any impediments identified through this analysis; and</li> <li>● Maintaining records reflecting the analysis and actions taken. The objectives of this process are broad, including</li> <li>● Analyzing and eliminating housing discrimination in the jurisdiction;</li> <li>● Promoting fair housing choice for all persons;</li> <li>● Providing opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability or national origin;</li> <li>● Promoting housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities; and</li> <li>● Fostering compliance with the nondiscrimination provisions of the federal Fair Housing Act.</li> </ul> </td> </tr> </table>	<b>Fair Housing Goal:</b>	<p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>The HACL is committed to affirmatively furthering fair housing by:</p> <ul style="list-style-type: none"> <li>● Conducting an analysis to identify impediments to fair housing choice;</li> <li>● Taking appropriate actions to overcome the effects of any impediments identified through this analysis; and</li> <li>● Maintaining records reflecting the analysis and actions taken. The objectives of this process are broad, including</li> <li>● Analyzing and eliminating housing discrimination in the jurisdiction;</li> <li>● Promoting fair housing choice for all persons;</li> <li>● Providing opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability or national origin;</li> <li>● Promoting housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities; and</li> <li>● Fostering compliance with the nondiscrimination provisions of the federal Fair Housing Act.</li> </ul>
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## Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

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

**A.1** Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory**, **Number of Public Housing Units and or Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

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

### B. Plan Elements. All PHAs must complete this section.

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

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

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very 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 public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups

residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

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

**Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (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 operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

**Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

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

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

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

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

**Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

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

**Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

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

**Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

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

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

**B.2 New Activities.** If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

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

Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6). (Notice PIH 2011-47)

**Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6/mfph#4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4)

**Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

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

**Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

**Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

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

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

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

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

**Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).

**Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

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

**B.3 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

**B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved.

PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: “See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX.”

**B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

**C. Other Document and/or Certification Requirements.**

**C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

**C.2 Certification by State of Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([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.

**C.5 Troubled PHA.** If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark “yes,” and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark “no.” If the PHA is not troubled, mark “N/A.” ([24 CFR §903.9](#))

**D. Affirmatively Furthering Fair Housing (AFFH).**

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

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

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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

**NOTICE OF PUBLIC MEETINGS AND PUBLIC HEARING**  
**Lakeland Housing Authority**  
**FY 2024 Agency Plan and Plan Amendment for the Moving to Work (MTW)**  
**Cohort #4: Asset Building**

The Lakeland Housing Authority (LHA) has scheduled two (2) public meetings on its FY 2024 Moving to Work (MTW) Cohort #4: Asset Building Agency Plan for the general public at 8:30 a.m. on July 31 and August 14, 2023. The meetings will be conducted inside the Lakeland Housing Authority Conference Room. You may also send your comments in writing to **430 Hartsell Avenue, Lakeland, Florida 33815, Attention: MTW.**

**The Public (Meetings) Hearings are scheduled for:**

**July 31 and August 14, 2023, at 8:30 a.m.**

LHA has developed its Moving to Work (MTW) Cohort #4: Asset Building Agency Plan in accordance with U.S. Department of Housing and Urban Development rules and regulations including, but not limited to, additional updates received from the U.S. Department of Housing and Urban Development.

The Moving to Work (MTW) Cohort #4: Asset Building Agency Plan is available for review at the above address between the hours of 8:00 a.m. and 3:00 p.m., Monday through Thursday, beginning on July 14, 2023, and ending on August 30, 2023. A copy of the Plan will be posted in the lobby of LHA and at [www.lakelandhousing.org](http://www.lakelandhousing.org) for forty-five (45) days, starting July 14, 2023. Inquiries and comments may be directed to Carlos Pizarro, Senior Vice-President of Housing, at [cpizarro@lakelandhousing.org](mailto:cpizarro@lakelandhousing.org) and/or Valerie Brown, Vice-President of Administration and Finance, at [vbrown@lakelandhousing.org](mailto:vbrown@lakelandhousing.org) and/or Florida Relay services at 711 and/or by visiting: [www.lakelandhousing.org](http://www.lakelandhousing.org).

The Housing Authority of the City of Lakeland dated July 14, 2023.  
L2024 07/14; 2023-Public and Legal Notice



## **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 patterns<sup>1</sup> 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

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<sup>1</sup> 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.

<b>MTW Supplement to the Annual PHA Plan</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires: 03/31/2024</b>
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**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 agencies<sup>2</sup> 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.

<b>A.</b>	<b>PHA Information.</b>
<b>A.1</b>	<b>PHA Name:</b> _____ <b>PHA Code:</b> _____ <b>MTW Supplement for PHA Fiscal Year Beginning:</b> (MM/DD/YYYY): _____ <b>PHA Program Type:</b> <input type="checkbox"/> Public Housing (PH) only <input type="checkbox"/> Housing Choice Voucher (HCV) only <input type="checkbox"/> Combined <b>MTW Cohort Number:</b> _____ <b>MTW Supplement Submission Type:</b> <input type="checkbox"/> Annual Submission <input type="checkbox"/> Amended Annual Submission
<b>B.</b>	<b>Narrative.</b>
<b>B.1</b>	<b>MTW Supplement Narrative.</b>  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.

<sup>2</sup> Legacy MTW Agencies are agencies that were designated as MTW as of December 15, 2015

<b>C.</b>	<b>MTW Waivers and Associated Activities.</b>
	<b>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.</b>
<b>Screener</b>	<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> <li>• Currently Implementing</li> <li>• Plan to Implement in the Submission Year</li> <li>• Will be Discontinued in the Submission Year</li> <li>• Was Discontinued in a previous Submission Year</li> <li>• Not Currently Implemented</li> </ul>
<b>Core Questions</b>	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
<b>Narrative.</b> Describe the MTW activity, the MTW agency’s goal(s) for the MTW activity, and, if applicable, how the MTW activity 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 <u>just write one</u> narrative explaining that it covers both programs.]
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) <input type="checkbox"/> Cost effectiveness <input type="checkbox"/> Self-sufficiency <input type="checkbox"/> Housing choice
<b>Cost implications.</b> 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) <input type="checkbox"/> Neutral (no cost implications) <input type="checkbox"/> Increased revenue <input type="checkbox"/> Decreased revenue <input type="checkbox"/> Increased expenditures <input type="checkbox"/> Decreased expenditures
<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	<input type="checkbox"/> The MTW activity applies to all assisted households <input type="checkbox"/> The MTW activity applies only to a subset or subsets of assisted households  <i>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:</i>
<b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	(Check one) <input type="checkbox"/> New admissions (i.e., applicants) only <input type="checkbox"/> Currently assisted households only <input type="checkbox"/> New admissions and currently assisted households

Text	Input options and instructions
<p><b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?</p>	<p><input type="checkbox"/> The MTW activity applies to all family types  <input type="checkbox"/> The MTW activity applies only to selected family types  <i>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:</i></p> <p>Please select the family types subject to this MTW activity:  <input type="checkbox"/> Non-elderly, non-disabled families  <input type="checkbox"/> Elderly families  <input type="checkbox"/> Disabled families (to the extent those families are not exempt via a reasonable accommodation)  <input type="checkbox"/> Other – another specifically defined target population or populations. Please describe this target population in the text box. [Text box]</p>
<p><b>Location.</b> 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.</p> <p><b>For PH activities:</b> Does the MTW activity apply to all public housing developments?</p> <p><b>For HCV activities:</b> Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p><b>For PH activities:</b>  <input type="checkbox"/> The MTW activity applies to all developments  <input type="checkbox"/> The MTW activity applies to specific developments  <i>If the agency selects “The MTW activity applies to specific developments” then it is presented the follow up question:</i></p> <p>Which developments participate in the MTW activity? [agencies choose the applicable development number(s) from a list of their public housing developments]</p> <p><b>For HCV activities:</b>  <input type="checkbox"/> The MTW activity applies to all tenant-based units  <input type="checkbox"/> The MTW activity applies to all properties with project-based vouchers  <input type="checkbox"/> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers  <i>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:</i></p> <p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. [Text box]</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>Yes/No [If Yes]: NO            What is the status of the Safe Harbor Waiver request?  <input type="checkbox"/> The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).  <input type="checkbox"/> 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]</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>Yes/No/Already provided: Yes            [If Yes]: Upload Hardship Policy - The policy is attached.</p>
<p>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.)</p>	<p>Yes/No: N/A            [If yes, a list will be presented to select the applicable MTW activities]</p>

Text	Input options and instructions
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?	<b>This is the initial MTW plan.</b>
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 are pending? [numerical entry only]
Does the MTW activity require an impact analysis?	<b>NO</b>
Does the impact analysis apply to more than this MTW activity? 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.)	NO
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.	N/A
Please provide an explanation as to why the activity was discontinued or will be discontinued.	N/A

<b>Custom Questions</b>	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.
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<b>C.1</b>	<b>Tenant Rent Policies</b>
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1.a., 1.b. - Tiered Rent (PH & HCV)	Input options and instructions
Please describe how the income bands are structured.	N/A
Please upload the tiered rent policy table that shows the income bands.	N/A
What is the income basis for assigning households to income bands?	___ 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 following: how each household’s rent will be set in the first year; how frequently rents will change and by what amount; and how the stepped rent will end (i.e., what is the maximum rent). Please	N/A

<b>1.c., 1.d. - Stepped Rent (PH &amp; HCV)</b>		<b>Input options and instructions</b>
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?		<input type="checkbox"/> They will no longer receive a subsidy <input type="checkbox"/> They will continue to receive a shallow subsidy <input type="checkbox"/> Other\Not Applicable. [If checked]: Please explain [Text box]
<b>1.e., 1.f. - Minimum Rent (PH &amp; HCV)</b>		<b>Input options and instructions</b>
How much is the minimum rent or minimum Total Tenant Payment (TTP)?		\$
<b>1.g., 1.h. - Tenant Payment as a Modified Percentage of Income (PH &amp; HCV)</b>		<b>Input options and instructions</b>
What percentage of income will equal the Total Tenant Payment (TTP)?		__%
What is the income basis for calculating Total Tenant Payment?		<input type="checkbox"/> This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs) <input type="checkbox"/> This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) <input type="checkbox"/> 1.r. and/or 1.s. "elimination of deductions" <input type="checkbox"/> 1.t. and/or 1.u. "standard deductions" <input type="checkbox"/> 1.v. and/or 1.w "alternative inclusions and exclusions"
<b>1.i., 1.j. - Alternative Utility Allowance (PH &amp; HCV)</b>		<b>Input options and instructions</b>
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.		No alternative utility allowance will be selected.
<b>1.k., 1.l. - Fixed Rents/Subsidy (PH &amp; HCV)</b>		<b>Input options and instructions</b>
Describe the method used to establish the fixed rents.		No fixed rent
How many households are currently subject to this policy?		N/A

**Table 1.k.1, 1.l.1 - What is the fixed rent/subsidy for each of the following unit sizes?**

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

<b>1.m., 1.n. - Utility Reimbursements (PH &amp; HCV)</b>		[No custom questions for this activity.]
<b>1.o. - Initial Rent Burden (HCV)</b>		<b>Input options and instructions</b>
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?		__%
<b>1.p., 1.q. - Imputed Income (PH &amp; HCV)</b>		<b>Input options and instructions</b>
Does the imputed income policy assume a set number of hours worked per individual or per household?		(Check one) <input type="checkbox"/> Per individual <input type="checkbox"/> Per household
How many hours per week are assumed?		<b>30 Hours</b>
What is the assumed wage rate?		<b>The lesser of the State or Federal minimum</b>

<b>1.p., 1.q. - Imputed Income (PH &amp; HCV)</b>	<b>Input options and instructions</b>
How many households are currently subject to this policy?	_____ [number]
<b>1.r., 1.s. - Elimination of Deduction(s) (PH &amp; HCV)</b>	<b>Input options and instructions</b>
Which deduction(s) will be eliminated, modified, or added?	(Check all that apply) <input type="checkbox"/> Dependent allowance <input type="checkbox"/> Unreimbursed childcare costs <input type="checkbox"/> Other (please explain)
<b>1.t., 1.u. - Standard Deductions (PH &amp; HCV)</b>	<b>Input options and instructions</b>
How much will the single standard deduction be in the Fiscal Year?	\$__
<b>1.v., 1.w. - Alternative Income Inclusions/Exclusions (PH &amp; HCV)</b>	<b>Input options and instructions</b>
What inclusions or exclusions will be eliminated, modified, or added?	No changes

<b>C.2</b>	<b>Payment Standards and Rent Reasonableness</b>
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<b>2.a. - Payment Standards – Small Area Fair Market Rents (FMR) (HCV)</b>	<b>Input options and instructions</b>
Please explain the payment standards by ZIP code or “grouped” ZIP codes.	N/A
<b>2.b. - Payment Standards – Fair Market Rents (HCV)</b>	<b>Input options and instructions</b>
Please explain the payment standards by FMR.	Payment standards will be calculated using HUD's FMRs at 120%
<b>2.c. - Rent Reasonableness – Process (HCV)</b>	
Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method.	LHA will follow the process pursuant HUD rules and Regulations.
<b>2.d. - Rent Reasonableness – Third-Party Requirement (HCV)</b>	<b>Input options and instructions</b>
Please explain or upload a description of the quality assurance method.	The HCV program uses a private software dedicated to doing RR's.
Please explain or upload a description of the rent reasonableness determination method.	See attached.

<b>C.3</b>	<b>Reexaminations</b>
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<b>3.a., 3.b. - Alternative Reexamination Schedule for Households (PH &amp; HCV)</b>	<b>Input options and instructions</b>
What is the recertification schedule?	(Check one) <input type="checkbox"/> Once every two years <input type="checkbox"/> Once every three years <input type="checkbox"/> Other [If checked]: Please describe. [Text box]
How many interim recertifications per year may a household request?	___ 0 ___ 1 ___ 2 or more
Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.	Families will have the opportunity to recertify their annual income, assets and family composition every three years, unless a reasonable accomodation request is approved.
<b>3.c., 3.d. - Self-Certification of Assets (PH &amp; HCV)</b>	<b>Input options and instructions</b>
Please state the dollar threshold for the self-certification of assets.	\$__ \$50,000.

<b>C.4</b>	<b>Landlord Leasing Incentives</b>
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<b>4.a., 4.b., 4.c. - Vacancy Loss, Damage Claims, and Other Landlord Incentives (HCV)</b>	<b>Input options and instructions</b> (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 HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program)?	<input type="checkbox"/> To all units [No follow-up questions] <input type="checkbox"/> Certain types of units only [if checked, there are follow up questions]: What types of units does this policy apply to? <input type="checkbox"/> Accessible units <input type="checkbox"/> Units in particular types of areas or neighborhoods [if checked]: Please describe these areas briefly: [Text box] <input type="checkbox"/> Units/landlords new to the HCV program <input type="checkbox"/> Other [if checked]: Please describe briefly [Text box]
What is the maximum payment that can be made to a landlord under this policy?	Only for Emergency Housing Voucher when funding is available.]
How many payments were issued under this policy in the most recently completed PHA fiscal year?	__0__ [number of payments]
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	\$0.00 _____

<b>C.5</b>	<b>Housing Quality Standards (HQS)</b>
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<b>5.a. - Pre-Qualifying Unit Inspections (HCV)</b>	<b>Input options and instructions</b>
How long is the pre-inspection valid for?	__90__ [number of days]
<b>5.b. - Reasonable Penalty Payments for Landlords (HCV)</b>	<b>Input options and instructions</b>
What is the maximum penalty payment that can be made to a landlord under this policy?	One month's rent.]
How many penalty payments were charged under this policy in the most recently completed PHA fiscal year?	__0__ [number]
<b>5.c. - Third-Party Requirement (HCV)</b>	<b>Input options and instructions</b>
Please explain or upload a description of the quality assurance method.	The third party requirement will be met by the program inspector and managers.
<b>5.d. - Alternative Inspection Schedule (HCV)</b>	<b>Input options and instructions</b>
	[No custom questions for this activity.]

<b>C.6</b>	<b>Short-Term Assistance</b>
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<b>6.a., 6.b. - Short-Term Assistance (PH &amp; HCV)</b>	<b>Input options and instructions</b>
What is the term of assistance?	N/A __ [number of months]
How is the tenant contribution established for this program?	Not implemented.
How many households do you expect to serve in this program in the Fiscal Year?	__0__ [Numerical entry only allowed]
How do you fulfill the obligation to offer participants in this program the opportunity to transition to the HCV or public housing (as applicable) program subject to availability?	Not implemented.
Please list any partner organizations and briefly note the services that each provides.	Not implemented.



<b>C.7</b>	<b>Term-Limited Assistance</b>
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<b>7.a., 7.b. - Term-Limited Assistance (PH &amp; HCV)</b>	<b>Input options and instructions</b>
Does the term-limited assistance MTW activity exempt any type of household or individual other than the elderly or individuals with disabilities	<b>Not implemented.</b>
Please describe how the MTW agency supports households to prepare for the end of assistance.	N/A
How many households are currently subject to this policy?	<u>  0  </u> [number]

<b>C.8</b>	<b>Increase Elderly Age</b>
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<b>8. - Increase Elderly Age (PH &amp; HCV)</b>	<b>Input options and instructions</b>
What is the new definition of elderly?	<u> 62 </u> years old [Numerical entry allowed between 62 - 65]

<b>C.9</b>	<b>Project-Based Voucher Program Flexibilities (PBV)</b>
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<b>9.a. - Increase PBV Program Cap (HCV)</b>	<b>Input options and instructions</b>
What percentage of total authorized HCV units will be authorized for project-basing?	<u> 50 </u> %
<b>9.b. - Increase PBV Project Cap (HCV)</b>	Yes, to up to 50% based on availability of funds.
<b>9.c. - Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement (HCV)</b>	If the PBV are to be assigned to PHA owned projects, no selection process is needed nor required.
<b>9.d. - Alternative PBV Selection Process (HCV)</b>	PBV will only be assigned to projects where PHA is a partner.
<b>9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)</b>	<b>Input options and instructions</b>
How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?	<u> 25 </u> Units
How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?	<u> 0 </u> Units
How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?	<u> 50 </u> Units
How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?	<u> 0 </u> Units
<b>9.f. - Increase PBV Housing Assistance Payment (HAP) Contract Length (HCV)</b>	20 Years
<b>9.g. - Increase PBV Rent to Owner (HCV)</b>	120%
<b>9.h. - Limit Portability for PBV Units (HCV)</b>	No PBV portability allowed.

<b>C.10</b>	<b>Family Self-Sufficiency Program with MTW Flexibility (Traditional)</b>
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<b>10.a. - Waive Operating a Required FSS Program (PH &amp; HCV)</b>	We will continue operating the FSS program as designed.
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<b>10.b. - Alternative Structure for Establishing Program Coordinating Committee (PH &amp; HCV)</b>	<b>Input options and instructions</b>
Please describe the alternative structure and how it is designed to secure local resources to support an MTW Self-Sufficiency program.	No changes, please see FSS plan attached.
<b>10.c. - Alternative Family Selection Procedures (PH &amp; HCV)</b>	<b>Input options and instructions</b>
Please describe the purpose and goals of the alternative contract or locally developed agreement, and/or the MTW agency’s motivation for developing its own contract or agreement.	No changes, please see FSS plan attached.
<b>10.d. - Modify or Eliminate the Contract of Participation (PH &amp; HCV)</b>	No changes, please see FSS plan attached.
<b>10.e. - Policies for Addressing Increases in Family Income (PH &amp; HCV)</b>	<b>Input options and instructions</b>
How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?	No changes, please see FSS plan attached.

<b>C.11</b>	<b>MTW Self-Sufficiency Program</b>
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<b>11.a. - Alternative Family Selection Procedures (PH &amp; HCV)</b>	<b>Input options and instructions</b>
Will the MTW agency’s MTW Self-Sufficiency policy make the program mandatory for anyone?	Yes, seniors and disabled families are exempted.
<b>11.b. - Policies for Addressing Increases in Family Income (PH &amp; HCV)</b>	<b>Input options and instructions</b>
What is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program?	Earnings and escrow amounts will be calculated using the standard FSS formulas.

<b>C.12</b>	<b>Work Requirement</b>
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<b>12.a., 12.b. – Work Requirement (PH &amp; HCV)</b>	<b>Input options and instructions</b>
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, those were there is only one parent present in the household and child care is not available for children under 4 years old.
What counts as “work” under this the work requirement MTW activity?	At least 30 hours per week.
How will the MTW agency monitor compliance with the work requirement MTW activity?	Any non-working family must report their income every 30 days.
What supportive services are offered to support households to comply with the work requirement?	Households will be referred to Polk County Career Source.
How does the agency address noncompliance with the work requirement policy?	Families will be given 90 days to comply, if they fail to comply, the assistance can be terminated.
How many households are currently subject to the policy?	_1487__ [number]
How many households in the most recently completed PHA fiscal year were sanctioned for non-compliance with the work requirement?	_0__ [number]

<b>C.13</b>	<b>Public Housing as an Incentive for Economic Progress</b>
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<b>13. - Public Housing as an Incentive for Economic Progress (PH)</b>	<b>Input options and instructions</b>
How many months will households be able to remain in a unit while over income?	__1__ [number]

<b>C.14</b>	<b>Moving On Policy</b>
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<b>14.a. - Waive Initial HQS Inspection Requirement (HCV)</b>	No
<b>14.b. - Allow Income Calculations from Partner Agencies (PH and HCV)</b>	No
<b>14.c. - Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH &amp; HCV)</b>	No

<b>C.15</b>	<b>Acquisition without Prior HUD Approval</b>
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<b>15. - Acquisition without Prior HUD Approval (PH)</b>	See attached.
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<b>C.16</b>	<b>Deconcentration of Poverty in Public Housing Policy</b>
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<b>16. - Deconcentration of Poverty in Public Housing (PH)</b>	Families will required to work or enter into a training program.
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<b>C.17</b>	<b>Local, Non-Traditional (LNT) Activities</b>
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<b>17.a. - Rental Subsidy Programs</b>	<b>Input options and instructions</b>
Does the MTW activity apply to all LNT units/properties?	<input type="checkbox"/> The MTW activity applies to all units/properties <input type="checkbox"/> The MTW activity applies to specific units/properties <i>If the agency selects "The MTW activity applies to specific LNT units/properties" then it is presented the follow up question:</i>  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

<b>17.b. - Service Provision</b>	<b>Input options and instructions</b>
What types of services is the MTW agency providing?	Job hunting, resume assistance, etc...
How many households did the PHA provide services to in the most recently completed PHA Fiscal Year through this activity?	200__ [number]

17.b. - Service Provision	Input options and instructions
Does the MTW activity apply to all LNT units/properties?	<input type="checkbox"/> The MTW activity applies to all units/properties <input type="checkbox"/> The MTW activity applies to specific units/properties <i>If the agency selects "The MTW activity applies to specific LNT units/properties" then it is presented the follow up question:</i>  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)?	No ___0___ # 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, committed or spend/spent Funds to in Fiscal Year [2024]**

Question	Twin Lakes 3 West Lake 3 501 Hartsell Ave.	Cecil Gober Villa John Wriugh Hor AMP 1	10th Street Project	Washington Park 15 Lots 1500 New York
MTW Role: Acquisition, Rehabilitation, New Construction?				
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
<ul style="list-style-type: none"> <li>• 80% of AMI</li> </ul>				
<ul style="list-style-type: none"> <li>• 60% of AMI</li> </ul>				
<ul style="list-style-type: none"> <li>• 30% of AMI</li> </ul>				
<ul style="list-style-type: none"> <li>• 140% of AMI</li> </ul>				

<b>Question</b>	<b>Dakota Park AP1 1401 Kettles Ave Lakeland, FL</b>	<b>Renaissance 1500 New York Lakeland, FL</b>	<b>Auburndale PB development 2610 Old Dixie</b>	<b>[add name of development and address]</b>
MTW Role: Acquisition, Rehabilitation, New Construction?				
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
<ul style="list-style-type: none"> <li>• 80% of AMI</li> </ul>				
<ul style="list-style-type: none"> <li>• 60% of AMI</li> </ul>				
<ul style="list-style-type: none"> <li>• 30% of AMI</li> </ul>				
<ul style="list-style-type: none"> <li>• Other</li> </ul>				

<b>Question</b>	<b>[add name of development and address]</b>	<b>[add name of development and address]</b>	<b>[add name of development and address]</b>	<b>[add name of development and address]</b>
MTW Role: Acquisition, Rehabilitation, New Construction?				
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
<ul style="list-style-type: none"> <li>• 80% of AMI</li> </ul>				
<ul style="list-style-type: none"> <li>• 60% of AMI</li> </ul>				
<ul style="list-style-type: none"> <li>• 30% of AMI</li> </ul>				
<ul style="list-style-type: none"> <li>• Other</li> </ul>				

Question	[add name of development and address]	[add name of development and address]	[add name of development and address]	[add name of development and address]
MTW Role: Acquisition, Rehabilitation, New Construction?				
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
<ul style="list-style-type: none"> <li>80% of AMI</li> </ul>				
<ul style="list-style-type: none"> <li>60% of AMI</li> </ul>				
<ul style="list-style-type: none"> <li>30% of AMI</li> </ul>				
<ul style="list-style-type: none"> <li>Other</li> </ul>				

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Safe Harbor Waivers seeking HUD Approval:</b> 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.</p> <p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p><input type="checkbox"/> No <input type="checkbox"/> Yes [If yes, upload required information in a-g above for each Safe Harbor Waiver request]</p>
<b>E.</b>	<b>Agency-Specific Waivers.</b>
<b>E.1</b>	<p><b>Agency-Specific Waivers for HUD Approval:</b> 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.</p> <p>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.</p> <p>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</p>

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.

Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?

No [If no, skip to E.2]  
 Yes [If yes, please provide a title and upload required information in a-h above for each Agency-Specific Waiver request]

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**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 MTW agency have any approved Agency-Specific Waivers?

Yes [If yes, then the following questions will pop up for each Agency-Specific Waiver approved in Section E.1 in a previous submission; the titles will be prepopulated]  
 [Yes/No/Discontinued] Has there been a change in how the waiver is being implemented from when it was originally approved?  
 [If Yes]: If there has been a change, please provide a description of what has changed.  
 [If Discontinued]: 1) If this waiver has been discontinued, please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA. 2) If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation.

No [If no, question set concludes]

**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.

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	#
<b>Total Local, Non-Traditional Households</b>	#

\*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.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
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Question	Input options and instructions
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?	Yes, please see attached.

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
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Questions	Input options and instructions
Please provide the total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	_ 0 _ # of unit months
Please provide the total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	_ 0 _ # of unit months
How many units, developed under the local, non-traditional housing development activity, were available for occupancy during the prior full calendar year (by bedroom size)?	None

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	\$
<b>Totals</b>	#	#	#	#	#	#	#		#	#		

\* 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, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>. This would also include adaptable units as defined by HUD’s Section 504 regulation (See 24 CFR § 8.3 and § 8.22).



<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
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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
<b>1 Person</b>	#
<b>2 Person</b>	#
<b>3 Person</b>	#
<b>4 Person</b>	#
<b>5 Person</b>	#
<b>6+ Person</b>	#
<b>Totals</b>	#

<b>G.5</b>	<b>Housing Quality Standards.</b>
	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).

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

<b>I</b>	<b>Evaluations.</b>
<b>I.1</b>	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?	No

**Table I.1 - Evaluations of MTW Policies**

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

<b>J</b>	<b>MTW Certifications of Compliance.</b>
<b>J.1</b>	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.

**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 (01/01/2024), 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 identity, 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/Question	Core Questions	Custom Questions	Safe Harbor	Impact Analysis	Hardship Policy
<b>1. Tenant Rent Policies</b>					
a. Tiered Rent (PH)	X	X	X		
b. Tiered Rent (HCV)	X	X	X		
c. Stepped Rent (PH)	X	X	X	X	X
d. Stepped Rent (HCV)	X	X	X	X	X
e. Minimum Rent (PH)	X	X	X	X	X
f. Minimum Rent (HCV)	X	X	X	X	X
g. Total Tenant Payment as a Percentage of Gross Income (PH)	X	X	X	X	X
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	X	X	X	X	X
i. Alternative Utility Allowance (PH)	X	X	X		
j. Alternative Utility Allowance (HCV)	X	X	X		
k. Fixed Rents (PH)	X	X	X		
l. Fixed Subsidy (HCV)	X	X	X		
m. Utility Reimbursements (PH)	X				
n. Utility Reimbursements (HCV)	X				
o. Initial Rent Burden (HCV)	X	X	X	X	
p. Imputed Income (PH)	X	X	X	X	X
q. Imputed Income (HCV)	X	X	X	X	X
r. Elimination of Deduction(s) (PH)	X	X	X	X	X
s. Elimination of Deduction(s) (HCV)	X	X	X	X	X
t. Standard Deductions (PH)	X	X	X	X	X
u. Standard Deductions (HCV)	X	X	X	X	X
v. Alternative Income Inclusions/Exclusions (PH)	X	X	X		
w. Alternative Income Inclusions/Exclusions (HCV)	X	X	X		
<b>2. Payment Standards and Rent Reasonableness</b>					
a. Payment Standards- Small Area Fair Market Rents (HCV)	X	X	X	X	X
b. Payment Standards- Fair Market Rents (HCV)	X	X	X	X	X

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

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

## 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 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.

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**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.

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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.

## MTW Credit Building Policy- Draft

Under this option, the PHA would report the public housing rent payments of public housing households that enroll in the program through an informed consent process to one or more credit bureaus with the goal of building credit for those households. In implementing the Credit Building Option of the Asset Building Cohort, PHAs must incorporate the following elements into their policy design:

- 1) Structure: The PHA would offer the opportunity to participate in the credit building program to a set number of public housing households. The households would then enroll through an informed consent process in the credit building program or decide not to participate in the credit building program. The PHA must seek to report all public housing rent payments (on-time, late, and missed) for the public housing households participating in the credit building program to one or more credit bureaus at regular intervals. Rent reporting should be in accord with standard practices that protect consumers, such as not reporting unpaid balances that are small. During the informed consent process, the PHA must explain potential risks and benefits of participating in the credit building program. After deciding to participate in this credit building program, the household may contact the PHA and withdraw their participation at any time.
- 2) Eligibility: All Section 9 assisted households must be eligible to participate in the credit building program, regardless of elderly and/or disabled status.
- 3.) Implementation Period: The PHA must implement the overall credit building program by providing data itself or through a third-party entity to credit bureaus on public housing rent payments made by public housing households participating in the credit building program for at least 24 consecutive months. There is no implementation or participation time requirement per household.
- 4.) Number of Households: The PHA must offer the credit building program to at least 25 of its public housing households. The PHA may not offer the credit building program to more than 50% of its public housing assisted households during the 24-month implementation period without express permission from HUD. The Asset Building Cohort evaluator may assist the PHA in randomly selecting the public housing households to offer participation in the credit building program as needed.

# MTW Work Requirement Policy- Draft

## **Work Requirement**

The agency is authorized to implement a requirement that a specified segment of its PH and/or HCV residents work as a condition of tenancy, subject to all applicable fair housing and civil rights requirements and the mandatory admission and prohibition requirements imposed by sections 576-578 of the Quality Housing and Work Responsibility Act of 1998 and Section 428 of P.L. 105-276. Work requirements shall not apply to persons with disabilities or the elderly. However, persons with disabilities or the elderly, and families that include persons with disabilities or the elderly, must have equal access to the full range of program services and other incentives. The agency must update its Administrative Plan and/or Admissions and Continued Occupancy Plan (ACOP) to include a description of the circumstances in which families shall be exempt from the requirement. The Administrative Plan and/or ACOP should include a description of what is considered work as well as acceptable substitutes for work. The PHA Executive Director or Board may suspend the sanctions policy due to negative local economic conditions.

## **Work Requirement**

### **Activity**

#### **12.a. Work Requirement (PH)**

The agency may implement a work requirement for public housing residents who are at least 18 years old. Additionally, residents must be non-elderly and non-disabled.

#### **12.b. Work Requirement (HCV)**

The agency may implement a work requirement for HCV residents who are at least 18 years old. Additionally, residents must be non-elderly and non-disabled.

### **Statutes and Regulations Waived**

#### **Work Requirement (PH)**

Certain provisions of sections 6(l)(1) and 6(l)(5) of the 1937 Act and 24 C.F.R. 966.4(a)(2).

#### **Work Requirement (HCV)**

Certain provisions of 24 C.F.R.982.551.

### **Safe Harbor(s) - 12.a.**

- i. If the local work requirement policy applies to all eligible households, the maximum requirement would be 30 hours of work per week per household.
- ii. Prior to implementation, all residents shall be given notice six months in advance of the sanction policy for non-compliance.
- iii. The work requirement may apply to non-elderly, non-disabled households or non-elderly, non-disabled adult household members.\*

- iv. Those individuals exempt from the Community Service Requirement in accordance with Section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act must be exempt from the agency's work requirement.\*
- v. Individuals who are the primary caretaker for a child under 6 years of age or who are pregnant must also be exempt from the agency's work requirement.
- vi. Supportive services shall be provided, either through the agency or a partner organization, to assist families in obtaining employment or an acceptable substitute, as defined by the MTW agency's policy.
- vii. Work requirements shall not be applied to exclude, or have the effect of excluding, the admission of or participation by persons with disabilities or elderly individuals, or families that include persons with disabilities or elderly individuals.\*
- viii. Agency counts with a hardship policy, including a policy to address tenants seeking a determination of disability status.\*
- ix. The hardship policy in the ACOP and/or Administrative Plan must apply to families who are actively trying to comply with the agency's work requirement, but are having difficulties obtaining work or an acceptable substitute.\*
- x. The ACOP and/or Administrative Plan must also describe the consequences of failure to comply with the work requirement.\*

# MTW Reasonable Rent Policy- Draft

## Reasonable Rent Policy Requirement

***MTW agencies must establish a reasonable rent policy which shall be designed to encourage employment and self-sufficiency by participating families, consistent with the purpose of this Demonstration, such as by excluding some or all of a family's earned income for purposes of determining rent.***

MTW agencies are required to establish a reasonable rent policy that encourages self-sufficiency, which HUD defines as any change from the regulations in how rent is calculated for a household. Upon designation into the MTW Demonstration, MTW agencies are to submit their planned policy to implement a reasonable rent policy. The Department will work collaboratively with each MTW agency to ensure reasonable rent policy submissions are in accordance with MTW objectives and within an agency's authority under the available program waivers.

### **Activity**

#### **1.e. Minimum Rent (PH)**

The agency may set a minimum rent that is higher than allowed under current statute and regulation.

#### **1.f. Minimum Rent (HCV)**

The agency may set a minimum rent that is higher than allowed under current statute and regulation.

### **Statutes and Regulations Waived**

#### **Minimum Rent (PH)**

Certain provisions of sections 3(a)(1)-(2) and 3(a)(3)(A) of the Act and 24 C.F.R. 5.628 and 5.630.

#### **Minimum Rent (HCV)**

Certain provisions of sections 3(a)(3)(A) and 8(o)(2)( A)-(C) of the Act and 24 C.F.R. 5.628 and 5.630.

### **Safe Harbor(s) - 1.e. and 1.f.**

- i. Minimum rent must not exceed \$130 per month.
- ii. Agency must exclude elderly and disabled families from rent policy.
- iii. Agency must implement a hardship policy.\*



## MTW Funding Flexibility and Financial Reporting Policy- Draft

During the term of the demonstration, subject to changes in future years' appropriations, HUD will provide an MTW agency with public housing Operating Fund Program (OFP) grants, public housing Capital Fund Program (CFP) grants, and/or HCV HAP and Administrative Fee assistance as required. CFP grants may include Formula grants; Demolition or Disposition Transitional Funding (DDTF), which are included in regular Formula grants; and/or funds from older Replacement Housing Factor (RHF) grants (a program later superseded by DDTF). The HCV funding amount for MTW agencies may be increased by additional allocations of vouchers that the MTW agency is awarded over the term of its participation in the MTW demonstration. MTW Funding provided to an MTW agency, including public housing OFP grants, public housing CFP grants, and HCV HAP and Administrative Fee assistance, is subject to any laws promulgated in future years, which include without limitation: statutes, appropriations acts, notices implementing appropriations acts, regulations, and executive orders.

MTW Funding Flexibility MTW agencies will have the flexibility to apply fungibility among public housing Operating Fund, public housing Capital Fund, and HCV HAP and Administrative Fee assistance. These flexibilities expand the eligible uses of each covered funding stream, but do not negate the need for both the PHA and HUD to be able to account for the funding from its original source to the date of its ultimate eligible use by the PHA, comply with federal grant and financial management requirements, and use funds effectively and efficiently for their eligible purposes. As HUD continues to implement program-specific financial management policies in its core housing programs, MTW agencies will be subject to the same requirements and procedures as non-MTW agencies. Therefore, the requirements and procedures described in this notice may change as new financial management policies are implemented over time. HUD will update existing guidance and issue new reporting requirements, as appropriate, to allow HUD to meet its monitoring and oversight responsibilities while ensuring MTW agencies fully utilize and benefit from the flexibilities established by Congress for these funds pursuant to the MTW demonstration and the 2016 MTW expansion. HUD will also update existing guidance and issue new reporting requirements, as appropriate, to ensure compliance with 2 CFR part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, including with respect to Federal financial management.

An MTW agency participating in the MTW demonstration program may flexibly use public housing Operating and Capital Funds provided under Sections 9(d) and 9(e) of the 1937 Act and HCV HAP and Administrative Fee program funds provided under Section 8 of the 1937 Act, referred to collectively as MTW Funding. Certain provisions of Sections 8 and 9 of the 1937 Act and implementing requirements are waived as necessary to implement this flexibility. Once the MTW agency receives its MTW designation through the execution of the MTW ACC Amendment, **this flexibility in the use of MTW Funding does not require prior HUD approval.**

The MTW agency may use MTW Funding covered by MTW flexibility for any eligible activity under Sections 9(d)(1), 9(e)(1) and Section 8(o) of the 1937 Act and for the local, non-traditional activities specified in Appendix I of this notice. All MTW agency expenditures must be consistent with the MTW agency's charter, approved 5-Year and Annual PHA Plans, and the approved MTW Supplement to the Annual PHA Plan. Under permanent law, any reserves the MTW agency has accumulated prior to signing

an MTW ACC Amendment (including public housing Operating and Capital Reserves and HCV HAP and Administrative Fee Reserves) must be used for their originally appropriated purposes and shall not be used flexibly.

### **Calculation of Funding**

#### **i. Public Housing Operating Grants**

(a) Funding Calculation. The calculation of an MTW agency's Operating Fund subsidy grant eligibility will continue in accordance with operating subsidy formula law, regulations, and appropriations act requirements, as they may be amended.

(b) Eligible Uses. The MTW agency may use these funds for any eligible activity permissible under Section 9(e)(1) of the 1937 Act or, if the agency proposes to use the funding under its MTW flexibility, it may also use these funds for any eligible activity permissible under Section 8(o), Section 9(d)(1), and for the local, non-traditional activities specified in Appendix I of this notice.

(c) Central Office Cost Center (COCC). For an MTW agency's COCC, which collects fees for administrative services, an MTW agency may freely use the earned fees for any eligible activity but cannot move non-fee-based funds into the COCC.

### **Public Housing Capital Fund Formula and Grants**

(a) Funding Calculation. The MTW agency's public housing Capital Fund formula characteristics and grant amounts, including DDTF and RHF, will continue to be calculated in accordance with public housing law, regulations, and appropriations act requirements, as they may be amended.

(b) Financial Management Requirements Apply. MTW agencies must continue to follow the immediate need requirements applicable to all Capital funds and may not accelerate their drawdown of Capital funds for the purpose of funding reserves or for any other purpose.<sup>20</sup> All Capital funds, including funds in Budget Line Item (BLI) 1410 (Administrative Costs) and BLI 1492 (MTW), must be drawn down only when funds are due and payable.

(c) Eligible Uses. The MTW agency may use these funds for any eligible activity permissible under Section 9(d)(1) of the 1937 Act or, if the MTW agency proposes to use the funding under its MTW flexibility, it may also use these funds for any eligible activity permissible under Section 8(o), Section 9(e)(1), and for the local, non-traditional activities specified in Appendix I of this notice. CFP funds used for activities under Section 9(d)(1) are subject to all requirements relevant to non-MTW agency CFP funding, including eligible activities and cost limits.

(d) Requisitioning Funds. In requisitioning Capital Fund grant funds, the MTW agency will request funds using traditional Capital Fund BLIs for funds to be used for activities under section 9(d) and using the available MTW Budget Line (BLI 1492) items for activities under section 9(e), section 8(o), or local, non-traditional activities. MTW agencies shall not use the Transfer to Operations Budget Line (BLI 1406) since funds for all non-Section 9(d) activities shall be included in the MTW Budget Line (BLI 1492). The MTW agency will provide to HUD information on all capital activities funded by the MTW Funding as necessary to ensure compliance with requirements outside the scope of MTW, including environmental review requirements and Energy and Performance Information Center (EPIC) reporting requirements.

(e) **Obligation and Expenditure Requirements.** The MTW agency remains subject to the requirements of Section 9(j) of the 1937 Act with respect to Capital Fund grants. Section 9(d) funds remain subject to the obligation and expenditure deadlines and requirements provided in Section 9(j) despite the fact that they may be used flexibly. Capital Funds awarded to MTW agencies must be obligated within two years and expended within four years of award. Funds not obligated or expended within those timeframes will be subject to recapture. As with all agencies, an MTW agency may requisition CFP funds from HUD only when such funds are due and payable, unless HUD approves another payment schedule.

### **Housing Choice Voucher Funding**

(a) **Funding Calculation.** As is the case for non-MTW PHAs under current appropriations law, the HAP renewal funding eligibility for MTW agencies will be calculated based on each MTW agency's actual expenses for the previous calendar year (known as the re-benchmark year). Unique to MTW agencies, however, the MTW agency's actual expenses are: 1) the previous Calendar Year's HAP expenses reported in the Voucher Management System (VMS), and 2) the previous CY's eligible non-HAP MTW expenses reported in VMS.<sup>21</sup> For both HAP and non-HAP MTW expenses, the reported expenses must have been paid from an eligible source of funds as described in paragraph (c) below in order to be included in the HAP renewal funding formula. In addition, MTW HAP renewal funding is subject to an MTW Renewal Eligibility Cap derived from the number of units authorized under the MTW agency's ACC, as described in paragraph (d) below. The lower of the total combined HAP and non-HAP expenses or the MTW Renewal Eligibility Cap will then be adjusted by the Renewal Funding Inflation Factor (RFIF) and any national proration that applies to the HCV renewal appropriation to determine the MTW agency's actual CY HAP renewal funding.

Example: An MTW agency executes its MTW ACC Amendment in September 2020. In CY 2020, the MTW agency expended \$3,600,000 on HAP and \$400,000 on eligible non-HAP MTW expenses. The MTW agency's HCV HAP renewal funding for CY 2021 will be \$4 million (assuming the HAP Renewal Eligibility Cap is greater than \$4 million), adjusted by the RFIF and any applicable national proration.

(b) **Eligible Uses.** The MTW agency may use these funds for any eligible activity permissible under Section 8(o) of the 1937 Act or, if the MTW agency proposes to use the funding under its MTW flexibility, it may also use these funds for any eligible activity permissible under Section 9(e)(1), Section 9(d)(1), and for the local, non-traditional activities specified in Appendix I of this notice.

(c) **HAP Renewal Sources of Funds.** The only HAP and non-HAP MTW expenses that will be included in the MTW HAP renewal formula are those paid for with the same sources of funds that would be included in the non-MTW HAP renewal formula for a non-MTW agency except as otherwise provided herein (see PIH Notice 2013-28 and any future successor notices). Accordingly, HAP expenses and non-HAP MTW expenses must be paid from the following sources of funds to be included in the HAP renewal formula calculation:

- (i) HCV budget authority,
- (ii) HUD-held HAP reserves (undisbursed budget authority),
- (iii) PHA-held HAP reserves (i.e., Restricted Net Position (RNP)),

(iv) Any funds from the HAP Set-aside (if available after PHA application and approval), and

(v) For HAP expenses only: Administrative fee reserves (i.e., Unrestricted Net Position). The administrative fee reserve is an eligible source of funds to be included in the MTW agency's MTW HAP renewal calculation, but only if the administrative fee reserve is used for HAP expenses. If the MTW agency is using administrative fee reserves for HAP expenses, the MTW agency must enter the amount of the administrative fee reserves used for HAP expenses in the comments section in VMS. Non-HAP MTW expenses paid from the administrative fee reserve are not eligible for renewal funding. Furthermore, when determining HAP renewal eligibility, the use of the administrative fee reserves is always first attributed to the MTW agency's non-HAP MTW expenses incurred during the calendar year before the expenditure of those reserves may be considered to be the source of funds for HAP expenses. If HAP expenses covered by the MTW Agency's administrative fee reserve exceed non-HAP MTW expenses for the calendar year, then the difference is applied to the HAP renewal calculation. Note that there is no restriction against using administrative fee reserves for non-HAP MTW expenses, just that those non-HAP MTW expenses are not eligible for inclusion in the MTW HAP renewal calculation.

HAP expenses or non-HAP MTW expenses that were paid for with any other funding source (for example, public housing Operating Funds and Capital Funds, and current year HCV Administrative Fee funds) will not be included in the MTW agency's HCV renewal funding calculation.

(d) HAP Renewal Eligibility Cap. The MTW agency's renewal eligibility for all MTW Years will be limited by the HAP Renewal Eligibility Cap. The calculation multiplies (1) the MTW agency's total number of MTW-eligible ACC authorized units in the re-benchmark year (the CY immediately preceding the CY for which the MTW agency's renewal eligibility is being calculated) by (2) the MTW agency's pre-MTW monthly per-unit cost (PUC) inflated to the re-benchmark year.

(i) The number of MTW-eligible ACC authorized units is measured in unit months available (UMAs).

(ii) The inflated pre-MTW PUC is projected using, as a base, the monthly PUC for the CY in which the MTW agency signed its MTW ACC Amendment. HUD applies the RFIF to this base PUC to estimate what the MTW agency's HCV PUC would be, had the MTW agency did not join the MTW program, as of the re-benchmark year. After the calculation of the HAP Renewal Eligibility Cap, it is compared with the MTW agency's actual total combined HAP and non-HAP MTW expenses. The lower of these two amounts – (1) the HAP Renewal Eligibility Cap or (2) the MTW agency's actual total combined HAP and non-HAP MTW expenses adjusted by the RFIF and any national proration factor – is then used to determine the MTW agency's CY renewal funding.

(e) Financial Management Requirements Apply. The same financial management requirements that apply to non-MTW agencies also apply to MTW agencies (e.g. Cash Management Requirements for the HCV Program with Notice PIH 2017-06 and successor notices).

(f) Administrative Fees. The Administrative Fee rates used to calculate fee eligibility for MTW agencies shall be established according to the same methodology used to establish Administrative Fee rates for all agencies, including non-MTW agencies. Under current appropriations law, as is the case for all agencies, administrative fees will be calculated on the basis of units leased as of the first day of each month; this data will be extracted from VMS at the close of each reporting cycle. Administrative fees for MTW agencies are also subject to the national proration factor and any other appropriations act requirements.

(g) Adjustments for the First-Time Renewal of Certain Vouchers. If the MTW agency receives incremental HCV vouchers and funding (including tenant protection vouchers), other than special purpose vouchers, renewal funding for those vouchers will be included in the MTW HCV renewal funding eligibility calculation for the following year. (See section VI.9 of this notice for further discussion of tenant protection and other special purpose vouchers.) The renewal amount for the following year is based on HAP costs reported for these increments in VMS in the prior year, which will be adjusted by the RFIF. Should the initial increment(s) be funded for less than twelve months due to lack of appropriations, HUD will adjust for the missing months upon renewal, by selecting the funded PUC for the initial increment times the number of units,<sup>26</sup> then adjusted by the RFIF. The aggregate renewal eligibility is always subject to the national proration factor. (h) Applicable Inflation Factor and Proration. The same applicable RFIFs that apply to non-MTW agencies will be applied to each CY to determine the MTW agency's HAP funding renewal eligibility. Likewise, the MTW agency's HAP funding renewal eligibility is subject to the same national proration as non-MTW agencies' renewal eligibility.

(i) Reserves. Reserves are subject to offsets as part of future Congressional appropriations acts.

(j) Local, Non-Traditional Activities. The MTW agency may spend up to ten percent of its HCV HAP funding on local, non-traditional activities, as described in Appendix I, without prior HUD approval. The MTW agency may spend more than ten percent of its HCV HAP funding on local, non-traditional activities by seeking HUD approval through a Safe Harbor Waiver.

(k) Rental Assistance Demonstration (RAD). Any vouchers received as part of a RAD Component I conversion shall be added to the ACC for the remainder of the CY in which they are awarded. HUD will issue a new increment of voucher funding in support of those vouchers for the first full CY following a RAD Component I conversion. In subsequent years, voucher funding for RAD-converted units will be renewed under the MTW HCV renewal funding calculation, adjusted by the Operating Cost Adjustment Factor (OCAF) and the applicable proration factor. Tenant protection vouchers provided for RAD Component II conversions are renewed in accordance with section VI.5.b.iii.g of this notice, Adjustment for the first-time renewal of certain vouchers, above.

Administrative fees for RAD vouchers will be calculated based on the same methodology used to establish administrative fees for non-MTW agencies. Fees for RAD vouchers will be prorated at the same level that applies to all non-MTW agencies.

(l) Voucher Programs Not Included in MTW Program. Vouchers and funding provided for the following special purpose vouchers, or any new special purpose vouchers provided in future appropriations acts, whether for new allocations or renewal of existing increments, shall not be included in the HCV MTW renewal calculation: HUD-VASH, FUP, FYI, NED, and Mainstream. These vouchers will be renewed under the regular voucher renewal requirements as provided under the appropriations acts.

## **HARDSHIP POLICY**

### **MTW Activity Alternative Reexamination Schedule and Minimum Rent**

As a Moving to Work (MTW) agency, the PHA has a written policy for determining when a requirement or provision of an MTW activity constitutes a financial or other hardship for the family. MTW regulations allows for the PHA to use a single hardship policy, as applicable, for multiple MTW waivers according to the Final Operations Notice Part VI: Appendix II, Hardship Policy. This hardship policy is applicable to MTW Activity for Alternative Reexamination Schedule and Minimum Rent for HCV and PH Households.

#### **PHA Policy**

The PHA will review its hardship policy(s) with residents during its intake and recertification processes. The resident must sign and submit consent forms for obtaining information requested by the PHA necessary to consider if a resident qualifies for a hardship exemption.

The PHA will determine if a resident qualifies for a hardship exemption under the following circumstances:

1. At the time of a potential termination of assistance that is due to an MTW activity
2. When a resident request a hardship exemption from a required MTW activity

The PHA will suspend the activity for the household, beginning the next month after the request, until the PHA has determined if the request is warranted. The PHA shall make a determination of whether a financial or other hardship exists within thirty (30) days after the family's request.

#### **Exemption Period**

If the PHA determines that a financial or other hardship exists, the family will receive exemption from the MTW activity as stated below. The MTW activity will resume after expiration of the exemption period.

1. 210 days for loss of benefits such as, but not limited to, Social Security (SS), SS Disability, SSI, Workman's Compensation, and other income as determined in 24 CFR 5.609(b) and (c) (4)(7)(8).
2. 180 days for temporary reduction of benefits such as, but not limited to, Social Security (SS), SS Disability, SSI, Workman's Compensation, and other income as determined in 24 CFR 5.609(b) and (c) (4)(7)(8).
3. 150 days for loss of income due to death by head, spouse, or co-head
4. 120 days for loss or reduction of employment or earnings for any reason
5. 90 days for increased expenses
6. 60 days for break in employment, new employment, or approval of benefit income
7. 30 days for all other circumstances

If the family fails to meet the hardship standard, the PHA will resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.

### **Hardship Standard**

The PHA will determine what constitutes financial hardship. A family may request hardship for the following circumstances. The family must experience a decrease in income because of changed circumstances:

1. Loss or reduction of employment
2. Loss of income due to death of the head, spouse, or co-head
3. Reduction in or loss of earnings or other benefit income
4. Awaiting approval for benefit income
5. The family has experienced an increase of 10% or more of the monthly gross income in expenses: medical costs, childcare, transportation, education, or housing cost.
6. Such other situations and factors as determined by the agency to be appropriate, such as eviction, termination of utilities, or wage garnishment.

### **Grievance Procedure**

A family may request for second level review of denied hardship requests. The family must submit a request must be in writing within 30 days of the PHA written notice. Hardship request may be denied for the following reasons:

1. Failure to provide verification for loss or reduction of benefit income
2. Failure to provide verification for eligibility of benefit income
3. Failure to provide verification of increased expenses
4. Family is not subject to eviction, utility shut off, or wage garnishment
5. Failure to submit verification for decrease or loss of employment
8. Failure to provide supporting documentation related to loss of income due to death by head, spouse, or co-head

## **Acquisition without Prior HUD Approval (PH)**

The Housing Authority of the City of Lakeland is authorized to acquire public housing sites without prior HUD approval. This activity would allow LHA as a MTW agency the flexibility around the timing of HUD's approval, but not the content of the approval. When acquiring the sites, LHA must have all submission materials in place as if HUD were approving the acquisition proposal prior to acquisition. LHA must provide the materials to the Field Office for approval within 30 days of acquisition. If the Department is unable to approve the acquisition based on the materials submitted, then the agency must repay the cost of acquisition with non-federal funds.

### **Statutes and Regulations Waived**

#### **Acquisition without Prior HUD Approval (PH)**

Certain provisions of 24 C.F.R. 905.608(a).

#### **Safe Harbor(s) - 15.**

- i. The agency must comply with and have documentation that the project is in compliance with local zoning as described in 24 C.F.R. 905.608(e).\*
- ii. The agency must commission an independent appraisal of the site as described in 24 C.F.R. 905.608(f).\*
- iii. Prior to acquisition, the agency must conduct an environmental assessment as described in 24 C.F.R. 905.608(h).\*
- iv. The agency must provide all required documents to HUD within 30 days of the acquisition.\*





Credit: Photographer, Ken Gutmaker; Architect, VMW

## What are the benefits of MTW for my community?

The MTW demonstration program can provide numerous benefits to your agency. Below we have listed a few of the benefits.

- *Authority to waive statutory and/or regulatory barriers* - As an MTW agency you are exempted from certain Sections 8 & 9 regulations. These exemptions allow your agency to implement new rent policies, increase self-sufficiency for families, provide incentives to landlords for participation in the voucher program, and many other things.
- *Ability to create policies that address your local needs* - MTW agencies can target assistance to specific populations or address specific issues within their community.
- *Rethink your current administration of public housing and voucher programs* - MTW agencies can streamline administrative procedures which saves staff time and costs. The money saved can be used to create additional resources for tenants and can help them achieve self-sufficiency, accomplish educational goals or increase their earned income.
- *Become an industry leader* - As demonstrated through the provisions in HOTMA and the Streamlining Rule, innovative policies implemented by MTW agencies have been instrumental improving the overall public housing and voucher programs for all public housing authorities.

Is there a policy you wish your agency could implement but a Section 8 and/or 9 requirement stands in your way? If so, MTW may be the program that will allow you to do that.

## What is MTW?

The Moving to Work (MTW) demonstration program provides select public housing authorities with a unique opportunity to become industry leaders. MTW agencies are able to design and test innovative, locally-designed housing and self-sufficiency strategies for low-income families rather than administering their public housing and Housing Choice Voucher (HCV) programs under the “one-size-fits-all” approach.

MTW agencies have the flexibility to apply fungibility across their HCV, Operating Funds, and Capital Funds. MTW agencies are also able to flexibly administer their public housing and HCV programs. MTW designated agencies are granted exemptions from existing public housing and voucher rules. Because of the exemptions provided, designated MTW agencies can create policies that address local needs.

Engaging your community is a critical component to the success of your MTW initiatives. It is never too early to start having conversations with your community, residents and stakeholders regarding your interest in MTW and policies you would like to implement.

## Why did LHA apply?

Agencies will be selected to participate in the MTW demonstration program through competitive Selection Notices. Each Selection Notice will invite a group of interested agencies to apply to a cohort that will test a specific policy change. These policy changes were determined based upon the advice of the MTW Federal Advisory Committee. Selected agencies will be able to implement any of the MTW Waivers contained in the MTW Operations Notice to the extent that the waiver does not adversely impact the cohort study.

## Table of MTW Expansion Cohorts

**Overall Impact of MTW Flexibility for Small PHAs:** This cohort will evaluate the overall impact of MTW flexibilities on PHAs with less than 1,000 units and the residents they serve.

The selection process for the MTW Flexibility for Small PHAs Cohort was completed in January 2021.

**Stepped Rents and Tiered Rents:** This cohort will evaluate different stepped and tiered rent models that may or may not be income based.

The selection process for the Stepped and Tiered Rent Cohort was completed in May 2021.

**Landlord Incentives:** This cohort will evaluate how to improve landlord participation in the HCV program through incentives such as participation payments, vacancy payments, alternate inspection schedules and other methods.

The selection process for the Landlord Incentives Cohort will begin in the early 2022.

**Future Cohorts:** HUD will consider the advice provided by the MTW Advisory Committee during the October 2021 meetings to determine what policy(ies) will be evaluated in future MTW cohorts.

More information on this cohort will be coming soon.

Interested agencies are encouraged to start thinking about what types of policies they would like to implement as part of the MTW demonstration program. Examples of the types of policies that have already been implemented by agencies can be found in the approved MTW Plans and accepted MTW Reports which are all available on our website. ([www.hud.gov/mtw](http://www.hud.gov/mtw)).

More information regarding the cohorts can be found on the MTW website. We also suggest that interested agencies review some of the resources below to find out more about MTW.

Resources: [Research and Evaluation of the MTW Demonstration](#)

## What are some examples of flexibilities that are available to MTW agencies?

Through the exemptions MTW agencies receive from certain Sections 8 and 9 requirements, MTW agencies can implement various innovative activities. These MTW activities must achieve at least one of three statutory objectives: 1. Cost Effectiveness; 2. Self-sufficiency; and 3. Housing Choice. The Table of MTW Statutory Objectives and Policy Examples shows a few of policies implemented by MTW agencies and the accompanying bulleted list of provides more detailed policy examples.

### Table of MTW Statutory Objectives and Policy Examples

Cost Savings	Self Sufficiency	Housing Choice
Using the MTW Funds to leverage funds	Linking rental assistance with supportive services	Developing mixed-income, tax credit properties, and other affordable housing
Streamlining HUD processes	Earned income exclusions	Developing sponsor-based voucher program to assist homeless and other at-risk groups
Simplification of rent calculations	Self sufficiency/ employment requirements	Encouraging moves to opportunity areas

- MTW agencies can adopt and implement policies for setting tenant rents in the tenant-based voucher program, project-based voucher program and public housing. These policies may include an alternative calculation of tenant rent that is not based on income, the elimination of utility reimbursement payments, the ability to eliminate deductions, and many other rent policies that can be found in the MTW Waivers.
- MTW agencies can establish an alternate reexamination schedule for both public housing and HCV households.
- MTW agencies can limit the duration of assistance for families in both public housing and the HCV program.
- MTW agencies may raise the PBV cap within a project up to 100%.
- MTW agencies may use MTW funds to provide a rental subsidy to a third-party entity.
- MTW agencies may use MTW funds to provide services for low-income non-residents and supportive services to residents.

*For more information on MTW please visit our website at [www.hud.gov/mtw](http://www.hud.gov/mtw)*





OFFICE OF PUBLIC AND INDIAN HOUSING

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-5000

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**Special Attention of:**

**NOTICE PIH 2022-11**

**Public Housing Agency Directors;  
Public Housing Hub Office Directors;  
Public Housing Field Office Directors;  
Program Center Coordinators;  
Resident Management Corporations;  
Resident Councils**

**Issued:** April 26, 2022  
**Expires:** This notice remains in effect until amended, superseded or rescinded

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**Subject:** Request for Applications under the Moving to Work Demonstration Program:  
Asset Building Cohort

**1) Purpose and Background**

This Notice offers eligible public housing agencies (PHAs) the opportunity to apply for admission to the Moving to Work (MTW) Demonstration Program. MTW allows PHAs to design and test innovative, locally designed housing and self-sufficiency strategies for low-income families by permitting PHAs to use assistance received under Sections 8 and 9 of the United States Housing Act of 1937, as amended, 42 U.S.C. 1437, *et seq.*, (1937 Act) more flexibly and by allowing certain exemptions from existing public housing and Housing Choice Voucher (HCV) program rules, as approved by the U.S. Department of Housing and Urban Development.<sup>1</sup>

The MTW Demonstration Program was originally authorized by Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996, P.L. 104-134; 42 U.S.C. 1437f note (1996 MTW Statute). Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute), authorizes HUD to expand the MTW Demonstration Program by designating an additional 100 PHAs over seven years (here after, the "MTW Expansion"). The 2016 MTW Expansion Statute provides that PHAs selected as part of the MTW Expansion must be high performers, meet certain size and Rental Assistance Demonstration (RAD) requirements, and represent geographic diversity across the country. All PHAs selected as a part of the MTW Expansion must follow the selection notice for their applicable cohort. All PHAs selected as a part of the MTW Expansion must also follow the MTW Operations Notice, which governs the participation of all PHAs in the MTW Expansion, establishes program structure, details terms and conditions, and provides

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<sup>1</sup> The MTW Demonstration Program may only provide certain policy changes (flexibilities) related to provisions of the 1937 Act. The MTW Demonstration Program does not provide any waivers to other applicable federal, state, or local laws or regulations. For examples on types of MTW flexibilities and more information on the MTW Demonstration Program, please go to: <https://www.hud.gov/mtw>.

all available MTW waivers and associated activities.<sup>2</sup>

This Notice lays out the process by which PHAs with 6,000 or less combined units of public housing and HCV units will be selected for the fourth cohort of the MTW Expansion, which will test asset building initiatives (Asset Building Cohort). For purposes of this Notice, Asset Building Initiatives are defined as activities that encourage the growth of savings accounts and/or aim to build credit for assisted households. Interested PHAs that meet the eligibility criteria in Section 5(B) of this Notice may submit an application package to HUD as detailed in Section 5(C) of this Notice. Eligibility and selection criteria are based on the requirements of the 1996 MTW Statute, the additional criteria in the 2016 MTW Expansion Statute, and other indicators that ensure qualified PHAs are selected. These criteria will also allow HUD to test important policy priorities of interest to the Department and the assisted housing community.

Section 2 of this Notice provides an overview of the evaluation and selection of PHAs in the Asset Building Cohort of the MTW Expansion. Section 3 contains information on the evaluation of the Asset Building Cohort of the MTW Expansion. Section 4 explains the selection process for the Asset Building Cohort of the MTW Expansion. Section 5 provides information on eligibility requirements and the application package for the Asset Building Cohort of the MTW Expansion. Finally, Section 6 gives administrative details and contact information.

## **2) Overview of Evaluation and Selection of PHAs in the Asset Building Cohort of the MTW Expansion**

The Asset Building Cohort of the MTW Expansion will evaluate Asset Building Initiatives and their effect on assisted households in the public housing and HCV programs. This Notice provides three options under which PHAs may seek to participate in the Asset Building Cohort of the MTW Expansion. Under the first option, titled the Opt-Out Savings Account Option, PHAs must deposit a set amount of funds per month into an escrow account for the benefit of assisted households with the goal of increasing the number of households that have bank accounts and strengthening household stability through asset building. Under the second option, titled the Credit Building Option, PHAs must report public housing rent payments to credit bureaus with the goal of increasing the credit score of assisted households. Under the third option, titled the PHA-Designed Asset Building Option, PHAs must design a local asset building program that encourages the growth of savings accounts and/or aims to build credit for assisted households. More information on each of these options is discussed in Sections 3(A)-(C) of this Notice.

PHAs seeking MTW designation in the Asset Building Cohort of the MTW Expansion will submit an MTW Plan and application package to HUD by the due date provided in Section 5(E) of this Notice. Specific elements and requirements of the MTW Plan and application package are discussed in Section 5(C) of this Notice.

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<sup>2</sup> The MTW Operations Notice is a Federal Register Notice and may be accessed at: <https://www.federalregister.gov/d/2020-18152>.

Upon receiving the MTW Plan and application packages from applicant PHAs, HUD will ensure that the MTW Plan and application packages are eligible and complete according to Section 5(B) of this Notice. If there are enough MTW Expansion slots available<sup>3</sup> for all of the PHAs that were found to have submitted eligible and complete application packages, HUD will offer MTW designation under the Asset Building Cohort of the MTW Expansion to all of those PHAs. If there are more applicant PHAs with complete and eligible application packages than MTW Expansion slots available, HUD will conduct a lottery of all eligible and complete MTW Plan and application packages in the affected size category. Those applicant PHAs selected through the lottery will be offered MTW designation under the Asset Building Cohort of the MTW Expansion. If a lottery is conducted, the applicant PHAs not selected through the lottery will not receive MTW designation under the Asset Building Cohort of the MTW Expansion but may apply for any future opportunities to join MTW under which they are eligible. All PHAs that submit an MTW Plan and application package under this Notice will be notified of their status (selected, not selected, not eligible/no complete application) after selections have been made.

The evaluation of the Asset Building Cohort of the MTW Expansion will be conducted by an independent research team (also referred to as the evaluator). The research methods this evaluator will utilize will vary depending on the Asset Building Cohort option selected by the PHA at the time of application. More details on the evaluation are provided in Section 3 of this Notice.

### **3) Asset Building Cohort Options and Evaluation Details**

This section provides information on the three options available to PHAs applying to the Asset Building Cohort of the MTW Expansion. It also details how the effectiveness of Asset Building Initiatives will be evaluated for this Cohort.

All PHAs that are selected to participate in the Asset Building Cohort of the MTW Expansion must participate in a “Community of Practice” that will seek to develop ideas and best practices in furthering the goals of Asset Building Initiatives. It is anticipated that the time commitment associated with this “Community of Practice” will be no more than two hours per quarter (or eight hours per year).<sup>4</sup>

All PHAs that apply to the Asset Building Cohort of the MTW Expansion must choose to participate in one of the following three options: Opt-Out Savings Account Option, Credit Building Option, or PHA-Designed Asset Building Option. These options are explained in greater detail below. The final, actual program design will also depend on technical feasibility and research considerations determined by HUD.

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<sup>3</sup> Per the 2016 MTW Expansion Statute and incorporating PHAs already selected to the MTW Expansion, as of the publication date of this Notice, there are currently 19 slots left in the MTW Expansion for PHAs in the size category with 1,000 or less public housing and HCV units and 11 slots left in the MTW Expansion for PHAs in the size category with between 1,001 and 6,000 public housing and HCV units. There are no slots remaining in the MTW Expansion for PHAs in the size category with more than 6,000 public housing and HCV units.

<sup>4</sup> Many outstanding policy details regarding the Asset Building Initiatives described in this Notice have not yet been determined. PHAs selected to participate in the Asset Building Cohort will use the Community of Practice as a resource in finalizing these policy details for the PHA.

## A. Opt-Out Savings Accounts Option

Under this option, the PHA would create an “opt-out” savings program to deposit a set amount of funds from HCV Housing Assistance Payment (HAP) or Operating Fund funding each month into an escrow account for the benefit of an assisted household. PHAs may also choose to supplement the savings program with other private and/or public funding sources. After one year, the assisted household would then have access to these funds.

In implementing the Opt-Out Savings Accounts Option of the Asset Building Cohort, PHAs must incorporate the following elements into their policy design:

- 1) *Structure*: The PHA must contribute a PHA-determined, set amount of funds per household, per month into an escrow or personal savings account for the benefit of each assisted household participating in the savings program. The PHA must utilize the Cohort-Specific Waiver and the associated activities titled “COHORT 5.1 Opt-Out Savings Account” found at the end of this section in implementing the savings program.
- 2) *Eligibility*: All Section 8 and Section 9 assisted households must be eligible to participate in the savings program, regardless of elderly and/or disabled status.
- 3) *Implementation Period*: The PHA must provide the monthly contributions to assisted households participating in the savings program for at least 24 consecutive months.
- 4) *Number of Households*: The PHA must offer the savings program to at least 25 of its Section 8 and/or Section 9 assisted households. The PHA may not offer the savings program to more than 50% of its Section 8 and/or Section 9 assisted households during the 24-month implementation period without express permission from HUD. The Asset Building Cohort evaluator may assist the PHA in randomly selecting assisted households to participate in the savings program as needed.
- 5) *Amount of Savings Contribution*:<sup>5</sup> The PHA must contribute at least \$10 per month for the benefit of each assisted household participating in the savings program. The PHA must not contribute more per month for the benefit of each assisted household participating in the savings program than the applicable fair market rent of the unit in which they reside.<sup>6</sup> This amount must be the same for each assisted household participating in the savings program.
- 6) *Access to Banking*: The PHA must develop and implement a strategy to connect assisted households participating in the savings program with banking resources in the community. Banking resources should seek to maximize access to banking and minimize fees and other risks to the financial position of assisted households. This

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<sup>5</sup> Any amount of HUD funds provided to households under this option must meet the reasonable cost requirements of 2 CFR 200.404.

<sup>6</sup> PHAs may supplement the amount of HUD funds provided to households with philanthropic and non-federal funding sources above the ceiling provided here.

strategy could be developed internally at the PHA or in conjunction with a partner organization. Assisted households participating in the savings program must have or obtain a bank account in order to receive funds from the savings program.

- 7) Access to Funds by Assisted Households: The PHA must let the funds accumulate in the escrow account for one year or until the account has reached a balance of \$120 before the assisted household may access them. The PHA may establish guidelines where assisted households can receive funds for an urgent need before the account has reached a balance of \$120. The PHA may not place restrictions on how the funds are utilized by the assisted household after the account has reached a balance of \$120.

The Cohort-Specific Waiver and associated activities for the Opt-Out Savings Account Option are:

**COHORT 5.1 Opt-Out Savings Account:** Normally, a household must opt-in under a contract of participation in a Family Self-Sufficiency (FSS) program to receive funds from the PHA through an escrow account. This MTW waiver and associated activities does not require participation in a traditional FSS program by the PHA or the household, eliminates the FSS contract of participation and other requirements, and allows the PHA to contribute funds to assisted households with the goal of increasing savings. A PHA may, but is not required to, operate an FSS program or other self-sufficiency program in conjunction with this waiver and associated activities.

<b>COHORT 5.1. Opt-Out Savings Account</b>
The agency is authorized to provide funds to assisted households with the goal of increasing savings of assisted households.

<b>COHORT 5.1.a.,COHORT 5.1.b. Opt-Out Savings Accounts</b>		
<b>Activity</b>	<p><b>COHORT 5.1.a. <u>Opt-Out Savings Accounts (PH)</u></b> - The agency is authorized to provide funds to assisted households with the goal of increasing savings of assisted households.</p> <ul style="list-style-type: none"> <li>• Funds shall be provided in the form of a savings account that will accrue for at least one year or until the account reaches \$120;</li> <li>• No contract of participation will be required;</li> <li>• Households do not need to meet eligibility requirements in the FSS statute;</li> <li>• All public housing assisted households must be eligible</li> </ul>	<p><b>COHORT 5.1.b. <u>Opt-Out Savings Accounts (HCV)</u></b> - The agency is authorized to provide funds to assisted households with the goal of increasing savings of assisted households.</p> <ul style="list-style-type: none"> <li>• Funds shall be provided in the form of a savings account that will accrue for at least one year or until the account reaches \$120;</li> <li>• No contract of participation will be required;</li> <li>• Households do not need to meet eligibility requirements in the FSS statute;</li> <li>• All HCV assisted households must be eligible to participate in</li> </ul>



	<p>to participate in the savings program, regardless of elderly and/or disabled status; and</p> <ul style="list-style-type: none"> <li>• The amounts of contributions are not tied to income and contributions will be made whether or not there is a corresponding increase in tenant rent.</li> </ul>	<p>the savings program, regardless of elderly and/or disabled status; and</p> <ul style="list-style-type: none"> <li>• The amounts of contributions are not tied to income and contributions will be made whether or not there is a corresponding increase in participant contribution.</li> </ul>
Statutes and Regulations Waived	<p><b>Opt-Out Savings Accounts (PH &amp; HCV)</b> - Certain provisions of sections 23(b)-(f), and (n)(1) of the 1937 Act and 24 CFR 984.101-105, 984.201-204, 984.301-306 and 984.401.</p>	
<p>Safe Harbor(s) <b>COHORT 5.1.a and COHORT 5.1.b</b></p> <ul style="list-style-type: none"> <li>i. The PHA must continue to follow all requirements of 2 CFR part 200.</li> <li>ii. 24 CFR 984.305(a) on accounting and reporting must be retained.</li> <li>iii. The PHA must contribute at least \$10 per month for the benefit of each assisted household participating in the savings program.</li> <li>iv. The PHA must not contribute more per month for the benefit of each assisted household participating in the savings program than the applicable fair market rent of the unit in which they reside.</li> <li>v. The PHA must provide an opportunity for households to opt-out of this activity.</li> </ul>		

## B. Credit Building Option

Under this option, the PHA would report the public housing rent payments of public housing households that enroll in the program through an informed consent process to one or more credit bureaus with the goal of building credit for those households.

In implementing the Credit Building Option of the Asset Building Cohort, PHAs must incorporate the following elements into their policy design:

- 1) *Structure*: The PHA would offer the opportunity to participate in the credit building program to a set number of public housing households. The households would then enroll through an informed consent process in the credit building program or decide not to participate in the credit building program. The PHA must seek to report all public housing rent payments (on-time, late, and missed) for the public housing households participating in the credit building program to one or more credit bureaus at regular intervals. Rent reporting should be in accord with standard practices that protect consumers, such as not reporting unpaid balances that are small. During the informed consent process, the PHA must explain potential risks and benefits of participating in the credit building program. After deciding to participate in this credit building program, the household may contact the PHA and withdraw their participation at any time.

- 2.) *Eligibility*: All Section 9 assisted households must be eligible to participate in the credit building program, regardless of elderly and/or disabled status.
- 3.) *Implementation Period*: The PHA must implement the overall credit building program by providing data itself or through a third-party entity to credit bureaus on public housing rent payments made by public housing households participating in the credit building program for at least 24 consecutive months. There is no implementation or participation time requirement per household.
- 4.) *Number of Households*: The PHA must offer the credit building program to at least 25 of its public housing households. The PHA may not offer the credit building program to more than 50% of its public housing assisted households during the 24-month implementation period without express permission from HUD. The Asset Building Cohort evaluator may assist the PHA in randomly selecting the public housing households to offer participation in the credit building program as needed.

### **C. PHA-Designed Asset Building Option**

As stated earlier, for purposes of this Notice, Asset Building Initiatives are defined as activities that encourage the growth of savings accounts and/or aim to build credit for assisted households. Under this option, the PHA would design a local asset building program to further one, or both, of these goals. PHAs should tie the PHA-Designed Asset Building Option to one or more of the following: activities requiring MTW statutory or regulatory flexibility, MTW funding flexibility, and/or building credit.

If a PHA seeks to implement both the Opt-Out Savings Account Option described in Section 3(A) of this Notice and the Credit Building Option described in Section 3(B) of this Notice, it should apply under this PHA-Designed Asset Building Option.

Inclusion of a program or initiative in the MTW Plan and application package does not constitute approval of the program or initiative. If selected and designated as an MTW PHA, the PHA must pursue approval of all programs and initiatives through the MTW Supplement and all processes described in the MTW Operations Notice. This includes the approval of the waivers and associated activities in Appendix I of the MTW Operations Notice and the approval of any Agency-Specific Waivers and/or Cohort-Specific Waivers.

### **D. Evaluation of the Asset Building Cohort of the MTW Expansion**

HUD will contract with an outside evaluator to conduct evaluations at each participating PHA. PHAs will be required to assist evaluators by providing information and facilitating access to participating households, but PHAs will not be responsible for evaluating Asset Building Initiatives. HUD anticipates that PHA engagement in the evaluation of its Asset Building Initiatives will not be burdensome.

HUD anticipates that the evaluation of Asset Building Initiatives will begin approximately six months after PHAs are selected for the Asset Building Cohort with the

collection of baseline data from participating households. The term of evaluation will be five years from the collection of baseline data.

HUD anticipates that the goals of the evaluation will be to document the implementation of the Asset Building Initiatives, understand perspectives and experiences of assisted households with these initiatives, and determine the impacts of the initiatives on outcome measures such as amount of savings, uses of accumulated savings, credit scores and other measures obtainable from credit reports, assessments of households' financial well-being, and participants' understanding of banking and credit.

#### **E. Restrictions for PHAs Participating in the Asset Building Cohort of the MTW Expansion**

Participation in the Asset Building Cohort of the MTW Expansion may affect an MTW PHA's participation in RAD. A PHA selected under the Asset Building Cohort of the MTW Expansion may not pursue a full RAD conversion to Project-Based Rental Assistance (PBRA) for the evaluation period. A RAD conversion to project-based vouchers (PBVs) would be allowed.

There are no other restrictions on the types of MTW waivers and associated activities that a PHA selected under the Asset Building Cohort of the MTW Expansion may pursue. All flexibilities and MTW waivers and associated activities available in the MTW Operations Notice are available to PHAs designated under this Cohort. PHAs in the Asset Building Cohort of the MTW Expansion must also follow all rules and approval processes contained in the MTW Operations Notice.

#### **4) Selection Process for the Asset Building Cohort of the MTW Expansion**

All PHAs that are interested in implementing one of the three options detailed in Section 3(A), 3(B) or 3(C) of this Notice and that meet the eligibility requirements outlined in Section 5(B) of this Notice by the submission deadline in Section 5(E) of this Notice, are invited to submit an MTW Plan and application package, which consists of the materials detailed in Section 5(C) of this Notice. HUD will select PHAs to participate in the Asset Building Cohort to the extent slots are available in the MTW Expansion (see footnote 3 on page 3 of this Notice). If more eligible and complete MTW application packages are received than slots available, HUD will conduct a lottery in the affected size category to fill the remaining slots in the MTW Expansion.

PHAs that have not applied to prior cohorts of the MTW Expansion, or that applied to prior cohorts of the MTW Expansion and were found not to be eligible for that cohort by HUD, will have eligibility assessed according to the full criteria in Section 5(B) of this Notice as described above.

PHAs that applied to prior cohorts of the MTW Expansion and were found to be eligible for that cohort by HUD are eligible for the Asset Building Cohort of the MTW Expansion if they are not troubled in either the Public Housing Assessment System (PHAS) or the Section Eight Management Assessment Program (SEMAP) as of the submission deadline in Section

5(E) of this Notice.

PHAs interested in the Asset Building Cohort of the MTW Expansion must submit an MTW Plan and application package to HUD under this Notice by the submission deadline in Section 5(E) of this Notice. HUD will then screen each MTW Plan and application package received to verify eligibility according to the requirements in Section 5(B) of this Notice. HUD will next assess all eligible MTW Plan and application packages for completeness under the elements in 5(B) of this Notice. If there is a question as to the MTW Plan and application package's eligibility and/or completeness, the PHA may have the opportunity to cure the deficiency. Deficiencies will be addressed according to Section 5(D) of this Notice. After the opportunity to cure deficiencies has passed, HUD will select PHAs among the eligible and complete MTW Plan and application packages to participate in the Asset Building Cohort. Those MTW Plan and application packages that were found to be not eligible and/or not complete will not be selected.

Following the review and selection process, HUD will notify the selected applicant PHAs via email of their selection in the Asset Building Cohort of the MTW Expansion. HUD will also notify those applicant PHAs not selected and those that were found to be not eligible and/or to not have completed the MTW Plan and application packages at that time. After HUD has made selections, if a selected applicant PHA declines to participate in the Asset Building Cohort of the MTW Expansion, HUD may randomly select another eligible and complete MTW Plan and application package (and the associated applicant PHA) as available.

Selection does not constitute formal entry into the MTW Demonstration Program. Selected PHAs may not flexibly use Section 8 and Section 9 funding or invoke any MTW flexibility before formal entry into the MTW Demonstration Program. This will not occur until an MTW Amendment to the Annual Contributions Contract (ACC)<sup>7</sup> detailing MTW participation is executed by both HUD and the PHA and any other requirements of the MTW Operations Notice are met.

Non-selection under the Asset Building Cohort will not preclude PHAs from seeking MTW designation at a future opportunity, provided the PHA is eligible under the terms of selection for that future opportunity.

Depending on the number of MTW Plan and application packages received, the size of the PHAs, the geographic regions represented, and prevalence of RAD participation, HUD may adjust the potential lottery procedures to account for these requirements of the 2016 MTW Expansion Statute. HUD will consider the location of current MTW PHAs in assessing geographic diversity. HUD may also consider the number of PHAs applying to participate under each of the three options described in Sections 3(A)-3(C) of this Notice in structuring potential lottery procedures.

## **5) Submission of MTW Plan and Application Package for the Asset Building Cohort of the MTW Expansion**

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<sup>7</sup> The MTW Amendment to the ACC is available in the "Forms" section of the MTW Expansion website at: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/mtw/expansion](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion).

## **A. MTW Plan and Application Package Submission Format Overview**

The MTW Plan and application package for the Asset Building Cohort of the MTW Expansion consists of the following:

- i. PART I - MTW Plan and Asset Building Initiatives Information (according to Section 5(C)(ii) of this Notice); and
- ii. PART II - Appendices 1-4 (according to Section 5(C)(iii) of this Notice).

## **B. Eligibility and Completeness Requirements for the Asset Building Cohort of the MTW Expansion**

By the submission deadline in Section 5(E) of this Notice, PHAs must meet all the eligibility and completeness requirements included in this section. All eligibility and completeness requirements will be verified as of that date. All eligibility requirements will be verified by HUD systems. All completeness requirements will be demonstrated by items in the MTW Plan and application package submitted by the PHA. The sources used to verify the eligibility and completeness requirements are given below.

Applicant PHAs that fail to meet the eligibility requirements listed here will be deemed not eligible. MTW Plan and application packages from non-eligible applicants will not be selected for designation under this Cohort or placed into any potential lottery. MTW Plan and application packages that fail to meet the completeness requirements listed here will also not be selected for designation under this Cohort or placed into the lottery. Opportunities to cure deficiencies in eligibility and/or completeness may be available according to the terms in Section 5(D) of this Notice.

### **i. Eligibility and Completeness Requirements<sup>8</sup>**

#### ***a) List of Statutory Eligibility Requirements***

HUD will verify the following eligibility requirements through HUD systems as of the submission deadline in 5(E) of this Notice:

- (1) Administration of no more than 6,000 aggregate public housing and/or HCV units as verified by HUD;<sup>9</sup>
- (2) Designation as a High Performer under the PHAS or Designation as a High Performer under SEMAP as verified by HUD; and
- (3) The applicant is a PHA.

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<sup>8</sup> PHAs that applied to the prior cohorts of the MTW Expansion and were found to be eligible for that cohort by HUD are eligible for the Asset Building Cohort of the MTW Expansion if they are not troubled in either PHAS or SEMAP as of the submission deadline in Section 5(E) of this Notice. Additional verification of the statutory and additional eligibility requirements will not be conducted for these PHAs. There will be verification of the completeness requirements for these PHAs.

<sup>9</sup> All authorized public housing and HCV units will be counted towards the aggregate amount, including any special purpose vouchers.

***b) List of Additional Eligibility Requirements***<sup>10</sup>

HUD will verify the following eligibility requirements through HUD systems as of the submission deadline in 5(E) of this Notice:

- (1) The PHA is not “troubled” under either PHAS or SEMAP (as applicable to the PHA’s inventory);
- (2) The applicant did not accept formal designation as an MTW PHA in another cohort of the MTW Expansion;
- (3) The PHA has a reporting rate in IMS/PIC of at least 90% of households in both the public housing and HCV programs (as applicable to the PHA’s inventory);
- (4) If the PHA administers an HCV program, the PHA is up to date on all required submissions into the Voucher Management System (VMS);
- (5) The PHA submitted all required submissions for the preceding three fiscal years into the Financial Assessment Sub-System (FASS-PH), Financial Data Schedule (FDS);
- (6) The PHA submitted its most recent PHA Plan that was due to HUD;
- (7) There are no unaddressed findings from Inspector General audits, Independent Public Accountant (IPA) audits, Tier I or II reviews, litigation with HUD, or any other on-site or remote reviews for the PHA. The PHA has resolved outstanding nondiscrimination or equal opportunity charges, cause determinations, lawsuits, or letters of finding in accordance with Section 5(B)(i)(d) of this Notice. The PHA is not currently the subject of any unresolved Departmental challenge to the validity of the PHA’s civil rights certification under 24 CFR 903.7(o) and 903.15;
- (8) If the PHA administers a public housing program, the PHA complied with obligation and expenditure deadlines of Capital Fund Program (CFP) grants in accordance with the requirements of Section 9(j) of the 1937 Act for the past three years; and
- (9) If an outstanding repayment agreement with HUD is in place, the PHA has made payments according to that agreement or has come into compliance with the agreement.

***c) List of Completeness Requirements***

HUD will verify the following completeness requirements from the MTW Plan and application package as submitted by the deadline in Section 5(E) of this Notice:

- (1) The PHA submitted an MTW Plan and application package consisting of the MTW Plan, Asset Building Initiatives Information, and applicable appendices;

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<sup>10</sup> In assessing eligibility, HUD will take into consideration any HUD-provided flexibility granted to the PHA associated with emergency or disaster relief.

- (2) The PHA chose to implement one of the three options detailed in Section 3(A), 3(B) or 3(C) of this Notice;
- (3) The PHA submitted a Board Resolution signed by the Board of Commissioners (or equivalent governing body) that: approves the PHA's desire to obtain MTW designation under the Asset Building Cohort of the MTW Expansion; states the intention to comply with the MTW objectives, MTW statutory requirements, and the MTW Operations Notice; confirms that the PHA met the public process requirements in Section 5(C)(i)(c) of this Notice; and states the commitment to implement the Asset Building Cohort option discussed in the MTW Plan and application package; and
- (4) The PHA met the public process requirements explained in Section 5(C)(i)(c) of this Notice.

***d) Non-Eligible Applicants***

An application submitted by multiple PHAs or from a consortium of PHAs will not be considered, nor will an application from individuals or other non-PHA entities.

Outstanding civil rights matters must be resolved before the submission deadline in Section 5(E) of this Notice. Interested PHAs who after review are confirmed to have civil rights matters unresolved at the submission deadline date will be determined ineligible, and the MTW Plan and application package will receive no further review. Interested PHAs having any of the charges, cause determinations, lawsuits, or letters of findings referenced immediately below that have not been resolved to HUD's Office of Fair Housing and Equal Opportunity's satisfaction by the submission deadline in Section 5(E) of this Notice are ineligible. Such matters include:

- Charges from HUD concerning a systemic violation of the Fair Housing Act or receipt of a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of a substantially equivalent state or local fair housing law proscribing discrimination because of race, color, religion, sex, national origin, disability or familial status;
- Status as a defendant in a Fair Housing Act lawsuit filed by the Department of Justice alleging a pattern or practice of discrimination or denial of rights to a group of persons raising an issue of general public importance pursuant to 42 U.S.C. 3614(a);
- Status as a defendant in any other lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974, Title II of the Americans with Disabilities Act, or a claim under the False Claims Act related to fair housing, non-discrimination, or civil rights generally including an alleged failure to affirmatively further fair housing;
- Receipt of a letter of findings identifying systemic non-compliance with Title

VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974; or Title II of the Americans with Disabilities Act; or

- Receipt of a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of provisions of a state or local law prohibiting discrimination in housing based on sexual orientation, gender identity, or lawful source of income.

HUD will determine if actions to resolve the charge, cause determination, lawsuit, or letter of findings taken before the submission deadline in Section 5(E) of this Notice are sufficient to resolve the matter. Examples of actions that may be considered sufficient to resolve the matter include, but are not limited to:

- Current compliance with a voluntary compliance agreement signed by all the parties;
- Current compliance with a HUD-approved conciliation agreement signed by all the parties;
- Current compliance with a conciliation agreement signed by all the parties and approved by the state governmental or local administrative agency with jurisdiction over the matter;
- Current compliance with a consent order or consent decree;
- Current compliance with a final judicial ruling or administrative ruling or decision; or
- Dismissal of charges.

### **C. MTW Plan and Application Package and Submission Format**

PHAs that meet the eligibility criteria in Section 5(B) of this Notice must submit an MTW Plan and application package as described in this section by the submission deadline in Section 5(E) of this Notice.

#### **i. MTW Plan and Application Package - Application Contents and Organization**

##### ***a) Electronic Submission Requirement***

The Asset Building Cohort MTW Plan and application package consisting of the MTW Plan, Asset Building Initiatives Information, and appendices must be submitted electronically as a converted PDF or as a Microsoft Word document (1997 version or higher) to Marianne Nazzaro; Director, Moving to Work Demonstration Program; e-mail: [MTWAssetBuilding@hud.gov](mailto:MTWAssetBuilding@hud.gov). The submittal e-mail should be titled “MTW Expansion Asset Building Cohort - Application Package” and should include the name and number of the PHA and relevant contact information in the body of the email.

The addressee that transmitted the Asset Building Cohort MTW Plan and application package will be considered the main point of contact for the PHA and



will receive an email confirming receipt within 72 hours of submission. That main point of contact for the PHA will also receive any other correspondence related to the PHA's Asset Building Cohort application. If at any time that main point of contact for the PHA should be updated, the new main point of contact must send an email request to that effect to: [MTWAssetBuilding@hud.gov](mailto:MTWAssetBuilding@hud.gov). A PHA may only have one main point of contact at a time.

***b) Instructions on Page Counts for the MTW Plan and Application Package***

The Asset Building Cohort MTW Plan and application package will consist of two parts. The first part will include the MTW Plan and Asset Building Initiatives Information. The MTW Plan will consist of narrative information responding to Section 5(C)(ii)(a) of this Notice. The Asset Building Initiatives Information will consist of information responding to Section 5(C)(ii)(b) of this Notice. All pages should be numbered in this first part of the MTW Plan and application package. The second part of the MTW Plan and application package will include appendices and other supporting documentation responding to Section 5(C)(iii) of this Notice. Pages should be numbered only in Appendix 4 of this second part of the MTW Plan and application package.

The first part of the MTW Plan and application package containing the MTW Plan and the Asset Building Initiatives Information must contain page numbers and is suggested to be no more than 15 pages in length (it is suggested that PHAs allot 10 pages for the MTW Plan and five pages for the Asset Building Initiatives Information).

The second part of the MTW Plan and application package containing the appendices consists mainly of certifications and forms that must be submitted as provided in this Notice or as published by HUD. There are no suggested page limits associated with Appendices 1-3 described below. Appendix 4 must contain page numbers and is suggested to be no more than 10 pages. There is no prescribed format for the pages in Appendix 4 as they may be letters of support, meeting materials, sign-in sheets, resumes, etc.

***c) Public Process Requirements***

The Asset Building Cohort MTW Plan and application package must undergo a public process period, elements of which include all of the following:<sup>11</sup>

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<sup>11</sup> All notices and communications must be provided, and all hearings whether in person, virtual or via telephone must be conducted, in a manner that ensures effective communication with persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act and HUD's Section 504 regulation, and Titles II or III of the ADA and implementing regulations. Recipients must provide appropriate auxiliary aids and services necessary to ensure effective communication, which includes ensuring that information is provided in appropriate accessible formats as needed, e.g., Braille, audio, large type, assistive listening devices, and sign language interpreters, accessible websites and other electronic communications (See 24 C.F.R. 8.6; 28 C.F.R. 35.160, 36.303).

Under Title VI of the Civil Rights Act of 1964, PHAs are required to provide individuals with limited English proficiency (LEP) with meaningful access to their programs and services. Providing "meaningful access" will generally involve some combination of services for oral interpretation and written translation of vital documents.

- The PHA must publish a notice that a hearing will be held on the full MTW Plan and application package. The draft MTW Plan and Asset Building Initiatives Information must be available for public inspection for at least 30 days before submission of the MTW Plan and application package to HUD.
- The PHA must conduct a public hearing to discuss the MTW Plan and Asset Building Initiatives Information and invite public comment.
- The PHA's Board of Commissioners (or equivalent governing body) must approve the MTW Plan and application package by resolution no less than 15 days after that public hearing. This resolution must contain: confirmation of the PHA's desire to obtain MTW designation under the Asset Building Cohort of the MTW Expansion; a statement of the intention to comply with the MTW objectives, the MTW statutory requirements and the MTW Operations Notice; confirmation that the PHA met the public process requirements in this section of this Notice; and a statement of the commitment to implement the Asset Building Cohort option discussed in the MTW Plan and application package.

**d) *MTW Plan and Application Package Table of Contents***

All MTW Plan and application packages for the Asset Building Cohort of the MTW Expansion must be submitted with a table of contents arranged in the following order:

**PART I (suggested to be no more than 15 pages and including page numbers).**

- MTW Plan (suggested to be no more than 10 pages) – this is a narrative section that responds to Section 5(C)(ii)(a) of this Notice.
- Asset Building Initiatives Information (suggested to be no more than five pages) – this is a narrative section that responds to Section 5(C)(ii)(b) of this Notice.

**PART II (no page limit or page numbers necessary for Appendices 1-3. Appendix 4 suggested to contain no more than 10 pages and includes page numbers).**

- Appendix 1: Moving to Work Certifications of Compliance – this must be signed and submitted as described in Section 5(C)(iii)(a) and Attachment I of this Notice.
- Appendix 2: Public Process Documentation – this must be completed and submitted as described in Sections 5(C)(i)(c) and 5(C)(iii)(b) of this Notice.
- Appendix 3: Required Standard Forms – this must include the completed forms described in Section 5(C)(iii)(c) of this Notice.
- Appendix 4: Other Supporting Documentation – the PHA may provide supporting documentation as described in Section 5(C)(iii)(d) of this Notice.

**ii. PART I - MTW Plan and Asset Building Initiatives Information**

This section provides narrative information on the scope and quality of the PHA's planning for its proposed local MTW program and Asset Building Initiatives. This section should be no more than a total of 15 pages.

*a) MTW Plan (suggested to be no more than 10 pages)*

**(1) Vision for PHA's Local MTW Program**

Provide the PHA's overall vision for its local MTW program and the unique challenges and opportunities that participation in the MTW Demonstration Program would bring. The vision should be described as it relates to the three statutory objectives of the MTW Demonstration Program – cost effectiveness, self-sufficiency and housing choice. Provide an explanation of the reason(s) why the PHA wants to participate in the MTW Demonstration Program.

Provide a description of the experience and skills of the PHA personnel with primary responsibility for the administration of the local MTW program.

Provide a statement of fair housing and other civil rights goals, strategies, and specific actions. This subsection parallels the fair housing statement in the PHA Plan template that corresponds to the type of PHA. The statement supports the PHA's civil rights certification in its efforts to comply with 24 CFR 5.151, 903.7(o), and 903.15.

**(2) Plan for Future Community/Resident Engagement**

Discuss how the PHA plans to continue to engage assisted households in its low-income and affordable housing programs, as well as the broader community and stakeholders, in the implementation and development of its local MTW program. Describe any planned engagement efforts with the local community, including any outreach to racial and ethnic minorities, persons with limited English proficiency, persons with disabilities, families with children and groups representing such persons.

**(3) PHA Operating and Inventory Information**

Narratively provide a general description of the PHA's current public housing and HCV program units and the households that it serves. Discuss any major changes the PHA anticipates to the demographics of the households it serves. Discuss any major plans the PHA has for its housing stock as a result of its participation in the MTW Demonstration Program. Discuss challenges that the PHA faces in occupying public housing units, leasing HCV units and/or serving the special needs of specific populations.

Provide any specific examples of how the PHA has demonstrated innovation and creativity within its current program (including grants received, participation in other HUD programs, etc.)

#### **(4) Plan for Local MTW Program**

Describe what types of initiatives the PHA seeks to implement in its local MTW program and why. It is not necessary that the PHA put forth discrete activities but should discuss how the PHA seeks to utilize MTW flexibility in its community to address local needs. This discussion should be organized under the three statutory objectives of the MTW Demonstration Program, including: Cost Effectiveness, Self-Sufficiency, and Housing Choice.

#### **(5) Proposed Use of MTW Funds**

The PHA shall request authority to use public housing and HCV funds flexibly in this section.<sup>12</sup> Then, list or describe the PHA's proposed uses of MTW Funds. Describe how/if the PHA plans to use funds in a flexible manner across the traditional Section 8 and Section 9 programs.

#### **(6) Evidence of Significant Partnerships**

Discuss any significant partnerships between the PHA and other public agencies, city/state/local governments, private nonprofits and/or for-profit entities (particularly local welfare offices and local providers of job training, financial empowerment, and related services). The PHA should clearly explain how such partnerships will help to achieve the vision of the PHA's local MTW program. Discuss how the PHA intends to leverage funding and/or other in-kind resources in the implementation of its local MTW program.

### ***b) Asset Building Initiatives Information (suggested to be no more than five pages)***

#### **(1) Assessment of Existing Asset Building Programs**

Provide an assessment of past and existing efforts of the PHA on asset building for assisted households, including efforts that encourage the growth of savings accounts and/or aim to build credit for assisted households. This assessment should include a discussion of any current or past participation in HUD's FSS or other self-sufficiency programs, any PHA resources related to asset building education, and any partnerships with local organizations related to asset building and/or asset building education.

#### **(2) Choice of Asset Building Initiatives Option**

Identify one of the three options detailed in Section 3(A), 3(B) or 3(C) of this Notice that the PHA will implement if selected for the Asset Building Cohort of the MTW Expansion. The PHA must explain why it chose this option.

#### **(3) Information Specific to Asset Building Initiatives Option Chosen by PHA**

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<sup>12</sup> Per the 1996 MTW Statute, applicant PHAs must request the authority to use public housing and HCV funds flexibly in the MTW Plan and application package.

The PHA should only provide information under this item that is applicable to the Asset Building Initiative Option that was chosen.

If the PHA chose the ***Opt-Out Savings Account Option*** in Section 3(A) of this Notice:

- State the goal of implementing the savings program and the anticipated benefits of the savings program for assisted households.
- In the table below, identify the number of assisted households that the PHA anticipates will participate in the savings program and the amount of savings that will be contributed per household, per month.<sup>13</sup> These numbers must meet the thresholds and boundaries set in Section 3(A) of this Notice.

(A) Anticipated Number of Assisted Households Participating in Savings Program <i>(must be at least 25 households)</i>	
(B) Anticipated Percentage of Assisted Households Participating in Savings Program <i>(must be no more than 50% of total Assisted households)</i>	
(C) Anticipated Amount of Savings Contributed Per Household Per Month <i>(must be at least \$10 per household, per month)</i>	
Total PHA Investment Per Month <i>(A) x (C)</i>	
Total Anticipated PHA Investment Per Year <i>((A) x (C)) x 12 months</i>	
Total Anticipated PHA Investment for Life of Program <i>((A) x (C)) x 24 months</i>	

- Discuss if and how implementing the savings program will impact the PHA’s overall budget. If the total costs of the savings program to the PHA are projected to exceed 5% of the PHA’s overall budget, please state this and explain how the PHA will continue to meet utilization and occupancy goals. Discuss whether the PHA plans to seek funding or other resources from any other public or private sources to support the savings program.

<sup>13</sup> For example, if an applicant PHA with 200 assisted households anticipated that 50 assisted households would participate in the savings program with an anticipated amount of \$15 per month, per household, the table the PHA submitted would read as follows:

(A) Anticipated Number of Assisted Households Participating in Savings Program <i>(must be at least 25 households)</i>	50
(B) Anticipated Percentage of Assisted Households Participating in Savings Program <i>(must be no more than 50% of total Assisted households)</i>	25%
(C) Anticipated Amount of Savings Contributed Per Household Per Month <i>(must be at least \$10 per household, per month)</i>	\$15
Total PHA Investment Per Month <i>(A) x (C)</i>	\$750
Total Anticipated PHA Investment Per Year <i>((A) x (C)) x 12 months</i>	\$9,000
Total Anticipated PHA Investment for Life of Program <i>((A) x (C)) x 24 months</i>	\$18,000

- Discuss preliminary ideas on how the PHA strategy to increase assisted households' access to banking resources would be structured.

If the PHA chose the ***Credit Building Option*** in Section 3(B) of this Notice:

- State the goal of implementing the credit building program and the anticipated benefits of the credit building program for assisted households.
- Identify the percentage and number of public housing households to which the PHA anticipates it will offer participation in the credit building program. This number must meet the threshold set in Section 3(B) of this Notice.
- Discuss preliminary ideas on how the PHA would implement credit reporting of public housing rent payments on its own or with a partner organization.
- Discuss if and how implementing the credit building program will impact the PHA's overall budget. Discuss whether the PHA plans to seek funding or other resources from any other public or private sources to support the credit building program.

If the PHA chose the ***PHA-Designed Asset Building Option*** in Section 3(C) of this Notice

- Describe the asset building program envisioned by the PHA. State the goal of this program and the anticipated benefits of the program for assisted households. If the PHA utilized any evaluations or existing demonstrations to develop its policy, please include a description of these.
- State whether the primary program goal is to encourage the growth of savings accounts or to build credit for assisted households.
- Discuss the elements of the PHA's program that will encourage the growth of savings accounts and/or aim to build credit for assisted households.
- Distinguish between the elements that will require MTW statutory or regulatory flexibility, MTW funding flexibility and/or that are tied to building credit. The PHA should also distinguish related or adjacent elements that will not require MTW flexibility.
- Identify the percentage and number of assisted households that the PHA anticipates will be affected by the PHA's program.
- Discuss if and how implementing the PHA's program will impact the PHA's overall budget. Discuss whether the PHA plans to seek funding or other resources from any other public or private sources to support the PHA's program.

### iii. PART II - Appendices

#### **a) *Appendix 1: Moving to Work Certifications of Compliance (Attachment I of this Notice)***

The PHA must provide a certification that the MTW Plan and application package is consistent with the “Moving to Work Certifications of Compliance.” A certification sheet for this purpose is provided in Attachment I of this Notice.

#### **b) *Appendix 2: Public Process Documentation***

The PHA must provide documentation that the elements of the public process described in Section 5(C)(i)(c) of this Notice were met. There is no prescribed format or page limit for this appendix, but materials must include:

- The public notice advertising the public hearing;
- Evidence that the public hearing was held (items could include minutes, sign-in sheet, etc.); and
- A resolution signed by the Board of Commissioners (or equivalent governing body) adopting the MTW Plan and application package and the certifications contained therein. This resolution must contain: confirmation of the PHA’s desire to obtain MTW designation under the fourth cohort of the MTW Expansion; a statement of the intention to comply with the MTW objectives, the MTW statutory requirements and the MTW Operations Notice; confirmation that the PHA met the public process requirements in Section 5(C)(i)(c) of this Notice; and a statement of the commitment to implement the Asset Building Cohort option proposed in the MTW Plan and application package.

#### **c) *Appendix 3: Required Standard Forms***

The PHA must provide completed versions of the:

- Certification of Consistency with the Consolidated Plan (form HUD-2991);
- Certification of Payments (form HUD-50071); and
- Disclosure of Lobbying Activities (SF-LLL) if applicable.

Blank copies of these Standard Forms may be accessed on the fourth cohort website at: <https://www.hud.gov/mtw>.

#### **d) *Appendix 4: Other Supporting Documentation***

The PHA may elect to provide other materials such as letters of support, community meeting materials, resumes, memorandums of understanding, etc. to substantiate and reinforce narrative information provided in the MTW Plan and application package. Pages in this appendix must be numbered and length is suggested to be limited to 10 pages.

#### **D. Corrections to Deficient Applications**

HUD will uniformly notify each applicant of any curable deficiency by email, give instructions for how to address the curable deficiency, and give a date by which the PHA must respond to the curable deficiency. Failure to respond according to the instructions and deadline may result in the PHA failing to meet the requirements of this Notice.

#### **E. Application Submission Deadline**

MTW Plan and application packages in response to this Notice must be received by: **11:59 pm Eastern Daylight Time (EDT) on JULY 28, 2022.**

### **6) Administrative and Contact Information**

#### **A. Paperwork Reduction Act**

The information collection requirements contained in this document are approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 2501-3520). The OMB control number is 2577-0216. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

#### **B. Additional Resources**

PHAs interested in applying for the Asset Building Cohort of the MTW Expansion will find resources available in compiling the application package at: <https://www.hud.gov/mtw>. On this webpage, HUD will post this Notice, links to the standard forms listed in Section 5(C)(iii)(c) of this Notice, Frequently Asked Questions and other resources.

#### **C. Contact Information**

For further information, contact: Marianne Nazzaro; Director, Moving to Work Demonstration Program; e-mail: [MTWAssetBuilding@hud.gov](mailto:MTWAssetBuilding@hud.gov), or visit the MTW Demonstration Program website at: <https://www.hud.gov/mtw>.

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Dominique Blom  
General Deputy Assistant Secretary  
for Public and Indian Housing



**ATTACHMENT I**  
**Moving to Work Certifications of Compliance**

**CERTIFICATIONS OF COMPLIANCE**

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

**Certifications of Compliance with HUD and Federal Requirements and Regulations:**  
**Board Resolution to Accompany Application to the Moving to Work Demonstration Program**

Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the application to the Moving to Work (MTW) Demonstration Program for the PHA and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the application and implementation thereof:

- (1) The PHA will adhere to the MTW Operations Notice or successor notice and all requirements therein.
- (2) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure at least 75% of families assisted are very low-income as defined in Section 3(b)(2) of the 1937 Act throughout the PHA's participation in the MTW Demonstration Program.
- (3) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in establishing a reasonable rent policy that is designed to encourage employment and self-sufficiency.
- (4) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to assist substantially the same total number of eligible low-income families as would have been served absent MTW throughout the PHA's participation in the MTW Demonstration Program.
- (5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program throughout the PHA's participation in the MTW Demonstration Program.
- (6) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.
- (7) The PHA published a notice that a hearing would be held, that the application and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the application by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the application and invited public comment.
- (8) The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the application by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the application.

- (9) The PHA certifies that the Board of Commissioners 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).
- (10) The PHA certifies that it will carry out its application in conformity with: Title VI of the Civil Rights Act of 1964 (42 USC 2000d-2000d-4); the Fair Housing Act (42 USC 3601-19); Section 504 of the Rehabilitation Act of 1973 (29 USC 794); Title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.); all regulations implementing these authorities; other applicable Federal, State, and local civil rights laws; and that it will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)).
- (11) The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2) and will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (12) The application is consistent with the applicable Comprehensive Plan (or any plan incorporating such provisions of the Comprehensive Plan) for the jurisdiction in which the PHA is located.
- (13) The application certifies that according to the appropriate State or local officials that the application is consistent with the applicable Consolidated Plan.
- (14) The PHA complies 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.
- (15) The PHA complies with the Violence Against Women Act and its implementing regulations at 24 C.F.R. Part 5, Subpart L and Parts 960 and 966.
- (16) The PHA complies with the Architectural Barriers Act of 1968 and its implementing regulations at 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (17) The PHA complies 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 75.
- (18) The PHA complies with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (19) The PHA complies 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 and implementing regulations at 49 CFR Part 24.
- (20) The PHA complies 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.

- (21) The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (22) The 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 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.
- (23) With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (24) The PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (25) The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (26) The PHA will comply with the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards at 2 CFR Part 200.
- (27) The application and all attachments are available at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

\_\_\_\_\_  
**PHA NAME**

\_\_\_\_\_  
**PHA NUMBER/HA CODE**

*I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.S. §3729, 3802).*

\_\_\_\_\_  
**NAME OF AUTHORIZED OFFICIAL\***

\_\_\_\_\_  
**TITLE**

\_\_\_\_\_  
**SIGNATURE**

\_\_\_\_\_  
**DATE**

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

## MTW Expansion – Potential Implementation Timeline

In the timeline examples below, PHA A, B, and C, show the essential steps that must be completed to begin implementation.

Key Milestones/ Potential Timeline Options	Receive Selection Letter	Step 1: ACC Executed	Step 2: Finance	Step 3: Public Process	Step 4: Submit MTW Supplement	Step 5: Housing Inventory Program (HIP)	Step 6: Coordinate w. PD&R and Evaluator	Step 7: Receive Approval and Begin Implementation
PHA A	Sept	Nov	Dec	Jan/Feb	March	April	May	June
PHA B	Sept	Dec	Jan	Feb/Mar	April/May	May/June	May-July	July
PHA C	Sept	Jan	Feb	April/May	June	July	August	September

**NOTE:** Although the timelines for each PHA may vary, the order of steps 1-7 will remain the same for all; however, steps 1, 2, and 3 could happen simultaneously and potentially shorten the overall timeline.

<p><b>Step 1: Complete &amp; Execute the MTW ACC Amendment</b></p> <ul style="list-style-type: none"> <li>Review the MTW ACC Amendment with PHA Board</li> <li>Receive PHA Board approval, sign, and submit the MTW ACC Amendment to HUD</li> <li>HUD will review, sign (aka execute) and date the MTW ACC Amendment and return it to the PHA.</li> </ul> <p><b>Remember:</b> Execution of the MTW ACC Amendment by HUD will be the PHA’s official entry date to the MTW Demonstration Program</p>	<p><b>Step 2: Prepare your Agency’s Finances</b></p> <ul style="list-style-type: none"> <li>See the “Helpful Resources” page</li> <li>Remember, that the PHA cannot use funds flexibly until the <u>1<sup>st</sup> of the month</u>, <u>following</u> the date that MTW ACC Amendment is executed by HUD.</li> <li>MTW PHAs are subject to 2 CFR Part 200 requirements.</li> </ul>	<p><b>Step 3: Conduct Public Process and Complete Development of your PHA’s MTW Supplement to the Annual PHA Plan</b></p> <ul style="list-style-type: none"> <li>Develop and complete the initial research for the MTW Activities that the PHA has determined it intends to implement.</li> <li>Hold the Public Hearing(s) regarding the Supplement, discuss potential MTW activities with program participants, gather public feedback and finalize the PHA’s program.</li> </ul>
<p><b>Step 4: Submit the MTW Supplement</b></p> <ul style="list-style-type: none"> <li>Complete and submit the PHA MTW Supplement to the PHA Plan at the same time as the PHA’s Annual Plan is submitted to the Field Office.</li> </ul> <p><b>Remember:</b> The MTW Supplement is submitted via the on-line system.</p>	<p><b>Step 5: Migrate HUD-50058 and building and unit data to the new Housing Information Portal (HIP) system</b></p> <ul style="list-style-type: none"> <li>Examine and ensure all active households are in the current IMS/PIC System with the most recent action.</li> <li>Examine building and unit data to ensure all is correct.</li> </ul>	<p><b>Step 6: Coordinate with PD&amp;R and the Evaluation Team on Research</b></p> <ul style="list-style-type: none"> <li>Attend Meetings with PD&amp;R and the Evaluator and set up research on MTW Activities.</li> <li>Attend and participate in the Community of Practice.</li> </ul>
<p><b>Step 7: Receive Approval of MTW Supplement from your HUD Field Office</b></p>		

## MTW Expansion Implementation Steps

The following steps must be completed before you begin to apply MTW funding flexibility to your Section 8 Housing Choice Voucher (HCV) and Section 9 Public Housing funding and before you implement your MTW activities. Please refer to the “Potential Implementation Timeline” on page one to see possible timelines for implementation to determine what is right for your Agency. The MTW Office recommends that you plan to sign and submit your MTW ACC Amendment no later than March 2023.

### Step 1. Execute your MTW Amendment to the ACC

The MTW Amendment to the Annual Contributions Contract (hereafter, MTW ACC Amendment), sets the terms of participation and details the requirements and covenants for your PHA to follow, as described in the Selection Notice and the MTW Operations Notice. You will want to review this document with your PHA Board for their approval and signature prior to submission to HUD.

The MTW ACC Amendment is the first document that must be signed by your Agency and executed by HUD *before* you are able to use your funds flexibly or to implement MTW Activities. As you will see in Step 2, your Agency’s MTW funding flexibility will not become available until the 1<sup>st</sup> of the month following execution of the MTW ACC Amendment.

Please note: HUD cannot accept digital signatures for the MTW ACC Amendment but can accept scanned documents. What this means is that HUD can accept electronic submissions of your scanned MTW ACC Amendment with the PHA chief executive’s written signature in lieu of receiving a hard copy of signed ACC Amendments. PHAs should not send ACC Amendments through the postal service or via expedited delivery service.

### Step 2. Prepare your Agency’s MTW Finances

The ability to use MTW funds flexibly will not become effective until the 1<sup>st</sup> of the month following execution of the MTW ACC Amendment by HUD, so please use this time to familiarize your agency staff with reporting guidance for MTW Agencies found in the “Helpful Resources” attachment to this letter.

Please note: MTW PHAs may not start new activities until after their MTW Supplement to the PHA Plan (see step 3 and 4) has been approved by HUD.

### Step 3. Communicate with your community and develop your PHA’s MTW Supplement

The MTW Supplement is shorthand for the MTW Supplement to the Annual PHA Plan. The MTW Supplement has been designed to inform HUD, the families in the PHA’s subsidized housing programs, and members of the public about the MTW activities that the MTW Agency seeks to implement. The MTW Supplement is an essential communication tool for the MTW Agency to engage and inform the local community of the Agency’s plans and results in future years.

Prior to submitting your PHA's MTW Supplement to the PHA Plan, you may need to conduct two (2) public processes, as outlined in the [MTW Operations Notice](#), and be prepared to submit documentation as part of completing the Supplement in Step 4. The public process provides an effective tool for engagement with your local community and a method to receive feedback regarding potential MTW Activities to be implemented.

More information will be provided in the upcoming webinar February 22, 2023. See the "Helpful Resources" attachment for additional information.

Step 4. Submit the MTW Supplement to the PHA Plan

As described in Step 3, the MTW Supplement is the MTW *Supplement* to your agency's PHA Plan and is the document in which you will provide information regarding the MTW activities that your PHA plans to implement.

The MTW Supplement must be electronically submitted in its entirety and receive HUD approval prior to the implementation of any MTW activities. Additional training will be provided on completing the MTW Supplement to the PHA Plan as outlined in the attached Helpful Resources document.

Step 5. Transition your PHA Data to the Housing Information Portal (HIP)

As an MTW PHA, your Agency may implement MTW activities that will not conform to the regular HUD-50058. Instead, you will need to submit the HUD-50058 MTW Expansion, in the new Housing Information Portal (HIP) system. This will include the migration of your resident, participant, and if applicable, building and unit data from IMS/PIC. More information will be provided in an upcoming webinar. See the "Helpful Resources" attachment for additional information.

Step 6. Coordinate with PD&R and Evaluation Team

A vital component of the MTW Demonstration Expansion is to research the new innovations that your agency implements. You will join a "Community of Practice" with other PHAs in the Asset Building Cohort so that you may share ideas and learn from one another. You will also receive information about the evaluation through the "Community of Practice." More information will be provided in the upcoming webinar scheduled for November 2, 2022.

Step 7. Receive Approval of your MTW Supplement and Begin Implementation of your MTW activities