



1/8/2021

Housing Authority of Washington County (OR022)

MTW Plan and Application Package



[Komi Kalevor](#)

HOUSING AUTHORITY OF WASHINGTON COUNTY

TABLE OF CONTENTS

PART I: MTW PLAN AND RENT REFORM INFORMATION.....	2
A) MTW PLAN.....	2
I) <i>Vision for PHA's Local MTW Program</i>	2
II) <i>Plan for Future Community/Resident Engagement</i>	4
III) <i>PHA Operating and Inventory Information</i>	5
IV) <i>Plan for Local MTW Program</i>	7
V) <i>Proposed Use of MTW Funds</i>	8
VI) <i>Evidence of Significant Partnerships</i>	8
B) RENT REFORM INFORMATION.....	9
I) <i>Alternative Rent Policy Selection and Rationale</i>	9
II) <i>Describe Alternative Rent Policy to the Public</i>	10
III) <i>Information Technology Plan</i>	14
IV) <i>Tiered Rent Table</i>	16
PART II: APPENDICES.....	17
A) APPENDIX 1: MOVING TO WORK CERTIFICATIONS OF COMPLIANCE.....	17
B) APPENDIX 2: PUBLIC PROCESS DOCUMENTATION.....	20
C) APPENDIX 3: REQUIRED STANDARD FORMS.....	21
I) <i>HUD 2991</i>	21
II) <i>HUD 50071</i>	22
III) <i>SF-LLL</i>	23
D) APPENDIX 4: OTHER SUPPORTING DOCUMENTATION.....	24

PART I: MTW PLAN AND RENT REFORM INFORMATION

a) MTW PLAN

I) VISION FOR PHA'S LOCAL MTW PROGRAM

The three Statutory Objectives of the Moving to Work (MTW) program are to: 1) reduce cost and increase cost-effectiveness, 2) increase self-sufficiency, and 3) increase housing choice. These goals align nicely with the Housing Authority of Washington County's (HAWC's) goals, as stated in its most recent [PHA Annual Plan](#): 1) Increase the availability of decent safe, and affordable housing; 2) improve community quality of life and economic vitality; 3) promote self-sufficiency and asset development of families and individuals; and 4) ensure equal opportunity in housing for all Americans. Regarding the last goal, HAWC has implemented Limited English Proficiency (LEP) and Violence Against Women Act (VAWA) policies and is committed to providing access to affordable housing regardless of race, color, religion, national origin, sex, familial status, or disability.

While HAWC has demonstrated success in reaching its stated goals, the MTW program and the flexibility it offers will enable the agency to implement and test strategies that were not previously available due to funding or regulatory restrictions. HAWC is interested in using MTW flexibility to shift focus from paperwork and verifications to improving household outcomes and HAWC will use its new MTW status to encourage its staff and community partners to think outside the box and find ways to improve and streamline process. In particular, the housing authority is interested in:

- Expanding its Family Self Sufficiency (FSS) program while also looking at making changes to the structure of the program that will provide more locally based and resident driven incentives.

- Moving to a triannual review cycle for senior/disabled populations that are not part of the rent reform thus substantially reducing the administrative burden on the authority.
- Creating local sponsor-based voucher programs (within framework of rent reform) that match vouchers with programs that improve outcomes for students in school (both college and primary) houseless families and working families.
- Expanding housing opportunities by leveraging the project-based voucher program strategic alignment of HUD authorized repositioning programs.
- End the EID (earned income disregard) policy
- PBV partners to hold waitlists
- PBV partners to perform initial inspection self-certification, but all PBV units will be inspected once annually by HAWC HQS Inspector.
- HQS Inspector able to inspect HAWC owned properties to eliminate the need to outsource these inspections.

The MTW program will allow HAWC to employ strategies for cost reduction and effectiveness. For example, the HUD-prescribed tiered rent model will allow HAWC to adapt a triennial reexamination schedule for eligible families (instead of annual) and eliminate deductions. These changes will save significant staff time by reducing the number of reexaminations and verifications that need to be performed, allowing HAWC to redirect its staff and resources into activities that hold a higher value for its participants. These higher value activities could include working with partners to provide career placement and training opportunities, connecting low income people to necessary services, and collaborating with public and private partners on a number of initiatives.

HAWC understands that becoming an MTW agency will have its challenges, but the agency is well-suited to take it on. Josh Crites is the agency's Assistant Director who currently oversees Public and Affordable Housing and will oversee the implementation of the MTW program. Josh previously worked as the MTW Policy Analyst for the Tacoma Housing Authority and has extensive experience developing and implementing housing programs and MTW plans and reports. He also worked on MTW strategies for the Seattle Housing Authority. In addition, HAWC has a staff of diverse skills who are excited for the opportunities and challenges that the MTW program has to offer. This includes its Executive Director Komi Kalevor who has over thirty years of real estate development experience and has worked on several complex partnership programs that created thousands of units of affordable housing throughout the Pacific Northwest. The Rental Assistance Program Manager, Liz Morris worked for the Seattle Housing Authority for over a decade and brings with her extensive knowledge of the MTW program. The Housing Choice Voucher Program Coordinator Emily Nichols worked at an MTW agency, the Oakland Housing Authority. While there she worked in both asset management and the voucher program and has extensive experience in how the flexibilities can be utilized and implemented.

II) PLAN FOR FUTURE COMMUNITY/RESIDENT ENGAGEMENT

HAWC believes that resident and community engagement is imperative to successful program implementation and is committed to engaging the community, soliciting feedback, and incorporating the views of its residents, applicants, and the community at large throughout its MTW planning and implementation activities. We also understand that specific outreach to our communities of color and tribal communities are important as many of these populations have been excluded from the decision-making processes so often with housing programs. Specific

outreach efforts include meeting with the agency's Resident Advisory Board, the Housing Advisory Committee, Oregon Law Center, organizations that represent communities of color including outreach to Bienestar, Unite Oregon, NAYA, Asian Family Center and Centro Cultural.

The housing authority also utilizes Washington County's communication department to broadcast information to the broader community using their various channels.

III) PHA OPERATING AND INVENTORY INFORMATION

HAWC currently has 2,771 Housing Choice Vouchers, 163 of which are project-based, and 244 Public Housing units. The housing authority also operates around 600 units of non-federal bond funded affordable housing units. Forty-eight (48%) percent of HAWC's population is disabled and 23% is elderly. The average household income is \$19,000, of which an average of \$10,300 is earned income. In addition, 76% of the households served are Extremely Low Income (ELI), 17% are Hispanic, 12% are African American, 19% are single adults with a dependent and 82% are white. HAWC does not anticipate any major shifts in the population it serves due to MTW program changes other than a gradual upward shift in household income and the proportion of income that is earned income for the households participating in the tiered rent program.

In addition to traditional housing authority programs and services, HAWC has participated in a number of innovative partnerships and programs to better serve its participants. A few examples include: 1) Metro 300 Program; a partnership between the housing authority and Kaiser Permanente, a large health care plan on the west coast, to house 80 houseless, senior/disabled individuals. Kaiser funded the housing authority with \$1.3 million dollars for

local funded rent assistance, housing navigation capacity building and the building up of capacity for culturally specific providers to deliver housing navigation services to communities of color.

2) The housing authority partnered with Meyer Memorial Trust on an innovative program to increase capacity of three behavioral health providers to deliver supportive housing services and better leverage the Medicaid system. For this, Meyer Memorial provided the housing authority with \$250,000 in grant dollars to fund the partnership. 3) Health Careers NW, a partnership between HAWC, Worksource Portland Metro and Worksystems, inc. providing opportunities for housing participants to access skills, training, and employment programs in the healthcare industry; (4) The housing authority also worked with its Metro regional government to procure and deliver over \$80 million dollars in locally funded dollars in 2020 to spur the development of over 700 units of new affordable housing. The housing authority staff drove the entire implementation of this including extensive community outreach and mandating set asides for Women and Minority Owned Businesses in the construction period.

For most households, participating in the tiered rent program will result in a slight increase in rent. HAWC estimates that 763 households will be eligible to participate in the program. Half will be part of the control group and the other half will be part of the treatment group. For those in the treatment group, households will see a rent increase of \$11 per month on average. However, the level of impact will depend largely on the size of the household. For example, the average rent difference for households with one (1) household member will see an average rent decrease of \$10, while households with six (6) or more household members will see a rent increase of \$34 on average. This is largely due to the elimination of the dependent deduction and the allowance for childcare expenses required by the tiered rent program as prescribed.

In addition to the impact on tenant rent, these changes will also impact the agency's HAP expenditures. HAWC anticipates that the tiered rent program will result in a \$90,000 decrease in HAP, enabling it to serve additional families.

IV) PLAN FOR LOCAL MTW PROGRAM

Cost Effectiveness: by implementing triennial reviews and eliminating deductions, HAWC will be able to redirect the staff time and resources toward activities that have a higher value for the participant. Additional activities related to cost-effectiveness that HAWC may consider include changing the HQS inspection schedule, adopting a streamlined process for performing rent reasonableness, and eliminating the selection process for project-based vouchers.

Self-Sufficiency: HAWC's FSS program currently leverages a number of partnerships to help participants by making targeted referrals. The MTW program will give HAWC the ability to increase the size of its self sufficiency programs while also making changes that will create more local resident driven incentives. HAWC currently partners with career training partners and would like to expand that opportunity and access under MTW. Any changes in the FSS program would be done so under consultation with HUD and its research partners to ensure the rent reform research project is completed without impact. The housing authority would also look at other opportunities to execute waiver 14, Moving on Policy, and Waiver 17 on local non-traditional programs. We believe there are opportunities to create incentive-based programs while still upholding the integrity of the cohort evaluation.

Housing Choice: there are several MTW waivers related to housing choice that HAWC may consider, including the ability to offer incentives to landlords with units in higher opportunity areas (Waiver 4) and the ability to develop non-Public Housing using MTW funds

(Waiver 17). Washington County is receiving around \$40 million dollars in local funds a year for the next 40 years to decrease homelessness. This local tax payer funded program will be a tool that the housing authority will look to combine with MTW flexibilities and partnerships to increase the overall number of affordable housing units in our community.

V) PROPOSED USE OF MTW FUNDS

As part of this MTW application package, HAWC formally requests authorization to use Public Housing and Housing Choice Voucher HAP and Admin funds flexibly. HAWC plans to use funds flexibly across the Section 8 and Section 9 programs. This flexibility will help ensure the overall viability of the programs that HAWC manages by providing additional subsidy for historically under-funded programs. While no plans currently exist to do so, HAWC may use its MTW funds to purchase, rehabilitate, or develop affordable housing.

VI) EVIDENCE OF SIGNIFICANT PARTNERSHIPS

HAWC leverages partnerships with others in the community for housing development, client services, and program augmentation. One major partnership listed earlier was Kaiser Permanente who funded the housing authority with \$1.3 million dollars to create a local subsidy program for homeless in our community. That catalytic investment formed a new partnership with Bienestar who is now providing culturally specific housing outreach and navigation services as a contractor for the housing authority. The housing authority also partnered with Meyer Memorial Trust and three behavioral health providers to create a new training program on housing navigation services. The program is also bringing the Oregon Health Authority into the partnership to figure out if a Medicaid Waiver could leverage federally backed housing stabilization services for housing authority and Washington County residents.

In the last year, Washington County partnered with Metro which is a government entity for the entire region. The housing authority partnered to procure and distribute over \$80 million dollars to develop over 700 new units of affordable housing. This was a groundbreaking program that voters approved in 2018 and has already been implemented. Washington County has also been a partnering agency in the development of over 500 units of affordable housing in the last five years. Other partners include developers in Washington County who receive HOME or CDBG funds through the Office of Community Development and affordable housing bond holders in Washington County. HAWC's website has a list of development partners [HERE](#). This list includes Federal, State and Local government agencies as well as local community partners.

It is the housing authority's goal to use the MTW program to further increase our ability to partner and create leverage points for both services and development. We understand that project-based vouchers are a significant lever in increasing the development of new deeply affordable housing units. We also understand with MTW flexibilities we can think creatively on how to increase the number of units created while also entering into partnerships that will help our residents improve their opportunities in education, increasing their earnings and meeting goals for their families. As outlined, the housing authority worked with large health insurance companies, behavioral health providers, Medicaid systems as well as culturally specific organizations to create innovative and new programs. Receiving the MTW status would further allow the housing authority to increase these types of opportunities.

b) RENT REFORM INFORMATION

I) ALTERNATIVE RENT POLICY SELECTION AND RATIONALE

The Housing Authority of Washington County (HAWC) has selected MTW Test Rent # 1, tiered rents, as its new rent policy. HAWC selected the tiered rent model because the stepped rents (Test Rent # 2 and Test Rent # 3) would each cause participant rent to increase too rapidly and, based on HAWC's rental market, the rent increases may be detrimental to the participants and the community as a whole. HAWC cannot select the last rent model, Test Rent # 4 because it does not have enough vouchers and units to qualify.

The tiered rent model will allow HAWC to significantly reduce its administrative burden without having a major impact on the tenant's rent. This is due to two main factors: 1) instead of conducting a reexamination every year for every family, HAWC will conduct a reexamination every three (3) years; note that there will be a hardship policy in place to deal with losses in income in between reexaminations; and 2) each household will be placed into a tier based on their *gross income*; gross income is the household's income before applying deductions, such as elderly, disabled, and dependent deductions, effectively eliminating the requirement to verify that each household meets the applicable deductions.

HAWC believes that the tiered rent model will benefit both the agency and participants. It will benefit the participants by allowing their income to increase over a three-year period without having any impact on their rent. It will benefit the housing authority by reducing the administrative burden associated with managing the annual review cycle and processing verifications. As HAWC reduces its administrative burden, staff will be able to shift focus from processing paperwork to helping participants find employment and aligning each participant with service partners who can work with them to increase their income and become self-sufficient.

II) DESCRIBE ALTERNATIVE RENT POLICY TO THE PUBLIC

The Department of Housing and Urban Development (HUD) has invited the Housing Authority of Washington County (HAWC) to apply to become a Moving to Work (MTW) agency. One of the requirements to be an MTW agency is to select and implement a HUD-prescribed rent model for the first six (6) years. The goal of the rent model is to enable households served by HAWC increase their earned income over time.

HAWC will first determine which families are eligible. In order to be eligible, a family must not be elderly, disabled, on Public Housing flat or ceiling rent, a participant in the Family Self-Sufficiency program, or receiving assistance through a special purpose voucher. Once the eligible families are selected, HAWC will divide them into two groups, a control group and a treatment group, by randomly assigning each household. Households in the control group will not see any changes to how their rent is calculated, while households in the treatment group will have their rent calculated using the new tiered rent model, which is described below.

For those who fall into the treatment group, their rent will be calculated by placing the household into an income tier based on their annual *gross* income. Gross income is the household's income before dependent deductions. Income tiers increment by \$2,500 and the tenant's rent is based on 30% of the mid-range of the tier. For example, if a household earns \$4,000 per year gross, they will fall into the \$2,500 to \$4,999 income tier and their rent will be based on \$3,750, which is the mid-range of the tier. Thirty (30) percent of \$3,750 is \$1,125, which results in \$94 per month for rent when divided by 12. The program has a minimum monthly rent of \$50, which means that any household earning less than \$2,500 per year will have a \$50 minimum rent per month. The full tiered rent table can be found at the end of this section of the application.

Note that the term “rent” includes the portion of the unit rent and utilities that the household is responsible for. If the rent is less than the utility allowance, the family will receive a utility allowance reimbursement, just as they would under current program rules.

The primary benefit to households on in the treatment group is that they can earn more income during the three-year period between reexaminations without seeing an increase in their rent. This means that the household earning \$4,000 per year and on a \$94 rent can begin earning \$50,000 (or more) and still continue to pay only \$94 in rent.

If the household’s income goes down, they can request a hardship. A household will qualify for a hardship if their income drops their rent into a lower tier, as long as the loss of income was involuntary. When this happens, HAWC will move the household to the lower tier for a minimum of one (1) month and a maximum of twelve (12) months, depending on the family’s circumstances.

HAWC anticipates the new rent model to be in place within the next twelve months, depending on the timing and approval of the MTW Plan and Application Package. Once the rent model is in place, the enrollment period will begin. During the enrollment period, HAWC staff will meet with each household impacted by the program changes, explain how these changes impact their rent, and perform the initial reexamination.

HAWC has performed some preliminary analysis and identified two areas of possible disparate impact due to the tiered rent program:

1. Black / African American families

- 62% of Black/African American families in HAWC’s portfolio would see a rent increase vs. 54% of white families. This is due to the larger average family size of

African American households (4.4) than White households (3.4). Note, however, that the average amount of the increase is less significant (\$14 vs. \$10).

Race	No. of Households	Average Family Size	% w/Increase in Rent	Average Ren Increase
Black / African American	151	4.4	62%	\$14
White	583	3.4	54%	\$10
Other	29	3.6	55%	\$14

2. Large households

- Because the dependent allowance has been eliminated, families with more dependents will see a larger rent increase. In addition, families with dependents and childcare expenses will see the largest rent increases of any family in HAWC’s portfolio.

	Average Rent Difference by Number of Dependents						
	0	1	2	3	4	5+	Total
No Childcare Expenses	-\$7	\$4	\$4	-\$2	\$14	\$29	\$4
Childcare Expenses	N/A	\$104	\$209	\$151	\$127	\$273	\$161
Total	-\$7	\$8	\$14	\$11	\$22	\$36	\$11

As part of the program implementation process, HAWC intends put a hardship policy in place that will help to mitigate outliers, account for necessary accommodations, and ensure that these changes do not cause an undue burden to specific households or households experiencing a disparate impact. While most increases in tenant rent may be small, there are some circumstances where a household’s rent could go up considerably. For example, under the

current rules, a household with unreimbursed childcare expenses will be able to deduct these expenses from their income before calculating rent; under the new rules, however, the household will not be able to take this deduction. If a household has \$10,000 in annual childcare expenses, this rule change could translate to a \$250 increase in rent. HAWC will identify a hardship policy for households to apply for if they are despairingly impacted.

III) INFORMATION TECHNOLOGY PLAN

Becoming an MTW agency and implementing the tiered rent reform will require a number of technology updates. Once approved for the program, HAWC will request authorization to treat any HUD special program vouchers (e.g., VASH, FUP, FIT) as MTW for 50058 submission purposes. These requests will likely need to be made separately to each special program office. Next, HAWC will need to perform a 50058 conversion, converting each household from non-MTW to MTW. This process will require HAWC to submit a code 6 (end of participation) 50058 in the non-MTW PIC module and a code 1 (new admission) 50058 in the MTW PIC module for each household. HAWC will work with its software vendor (Yardi) and IT consultants to perform this conversion.

Concurrently with the conversion to the MTW 50058, HAWC will work with Yardi and its IT consultants to set up the control and treatment programs in Yardi, including the alternate reexamination schedules, the tiered rent table, and other program-specific parameters. Please note that Yardi has informed the housing authority that the rent reform models needed are already built out in Yardi and available to the housing authority to utilize. Next, the IT team will work with HUD's designated consultant to randomly assign households to the control and treatment groups.

The housing authority has a strong history of implementing several large scale I.T. systems implementation. Included in that are:

- Implementing Yardi Voyager
- Implementing the more recent Yardi 7s Upgrades in a shorter time period than outlined by Yardi
- Implementing the Yardi mobile inspection and Yardi mobile maintenance modules
- Recently implementing the full suite of Yardi Rent Café portals which allow our residents to process annual reviews and interims online as well as allowing landlords to process all documents electronically.

IV) *TIERED RENT TABLE*

Tier #	Income Minimum	Income Maximum	Tiered Rent
1	\$0	\$2,499	\$50
2	\$2,500	\$4,999	\$94
3	\$5,000	\$7,499	\$156
4	\$7,500	\$9,999	\$219
5	\$10,000	\$12,499	\$281
6	\$12,500	\$14,999	\$344
7	\$15,000	\$17,499	\$406
8	\$17,500	\$19,999	\$469
9	\$20,000	\$22,499	\$531
10	\$22,500	\$24,999	\$594
11	\$25,000	\$27,499	\$656
12	\$27,500	\$29,999	\$719
13	\$30,000	\$32,499	\$781
14	\$32,500	\$34,999	\$844
15	\$35,000	\$37,499	\$907
16	\$37,500	\$39,999	\$969
17	\$40,000	\$42,499	\$1,032
18	\$42,500	\$44,999	\$1,094
19	\$45,000	\$47,499	\$1,157
20	\$47,500	\$49,999	\$1,219
21	\$50,000	\$52,499	\$1,282
22	\$52,500	\$54,999	\$1,344
23	\$55,000	\$57,499	\$1,407
24	\$57,500	\$59,999	\$1,469
25	\$60,000	\$62,499	\$1,532

PART II: APPENDICES

a) APPENDIX 1: MOVING TO WORK CERTIFICATIONS OF COMPLIANCE

ATTACHMENT 2 Moving to Work Certifications of Compliance

CERTIFICATIONS OF COMPLIANCE
<p style="text-align: center;">U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING</p> <p style="text-align: center;">Certifications of Compliance with HUD and Federal Requirements and Regulations: Board Resolution to Accompany Application to the Moving to Work Demonstration Program</p>
<p>Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairman 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:</p> <ol style="list-style-type: none">(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, 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.
- (11) The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2).
- (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, which incorporates a fair housing strategy that reflects the jurisdiction's AFH or Analysis of Impediments to Fair Housing Choice (AI), as applicable, and a description of the manner in which the PHA Plan 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 135.
- (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

/we, the undersigned, certify under penalty of perjury that the information provided above, as well as any information provided in the accompaniment herewith, 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; 31 U.S.C. § 3729, 3802).

NAME OF AUTHORIZED OFFICIAL*

TITLE

SIGNATURE

DATE

** Must be signed by either the Chairman 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.*

b) APPENDIX 2: PUBLIC PROCESS DOCUMENTATION

DRAFT

c) APPENDIX 3: REQUIRED STANDARD FORMS

I) HUD 2991

OMB Approval No. 2506-0112 (Exp. 12/31/2018)

**Certification of Consistency
with the Consolidated Plan**

**U.S. Department of Housing
and Urban Development**

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.
(Type or clearly print the following information:)

Applicant Name: _____

Project Name: _____

Location of the Project: _____

Name of the Federal
Program to which the
applicant is applying: _____

Name of
Certifying Jurisdiction: _____

Certifying Official
of the Jurisdiction
Name: _____

Title: _____

Signature: _____

Date: _____

II) HUD 50071

OMB Approval No. 2577-0157 (Exp. 03/31/2020)

Certification of Payments to Influence Federal Transactions

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

Applicant Name

Program/Activity Receiving Federal Grant Funding

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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 (mm/dd/yyyy)

Previous edition is obsolete

form HUD 50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

III) SF-LLL

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0046

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known:	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency:	7. Federal Program Name/Description: CFDA Number, if applicable: _____	
8. Federal Action Number, if known:	9. Award Amount, if known: \$ _____	
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI):	b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI):	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for required disclosure shall be more than \$100,000 for	Signature: _____ Print Name: _____ Title: _____ Telephone No.: _____ Date: _____	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

d) APPENDIX 4: OTHER SUPPORTING DOCUMENTATION

DRAFT