

Lake County Housing Authority – IL056

PHA Annual Plan -FYB 10.1.23

FY 24



"LCHA's vision is to be a leader in affordable housing by taking an innovative and dynamic approach to developing sustainable communities throughout Lake County."

L: Lifting up others

C: Changing lives by providing sustainable Affordable Housing

H: Helping create success stories

A: And empowering families one roof at a time

Lake County Housing Authority
33928 North U.S. Highway 45
Grayslake, IL 60030
847.223.1170
<https://www.lakecountyha.org>

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

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 or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both 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> PHA Name: <u>Lake County Housing Authority</u> PHA Code: <u>IL056</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>October 1, 2023 (FY24)</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>481</u> Number of Housing Choice Vouchers (HCVs) <u>3256</u> Total Combined Units/Vouchers <u>3737</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. 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> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </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: 15%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 25%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 15%;">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> <tr> <td> </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:																							
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:																																	

B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Asset Management.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s): Please see attachment B.1</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review. Please see attachment B.1</p>
B.2	<p>New Activities.</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 type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based 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 checked="" type="checkbox"/> <input type="checkbox"/> Occupancy by Police Officers.</p> <p><input checked="" type="checkbox"/> <input 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 type="checkbox"/> <input checked="" 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. Please see attachment B.2</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. Please see attachment B.3.</p>

B.4	<p>Capital Improvements. 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>Please see HUD form 50072 for FY2019-2023 approved on 07/09/2019.</p>
B.5	<p>Most Recent Fiscal Year Audit.</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>C. Other Document and/or Certification Requirements.</p>	
C.1	<p>Resident Advisory Board (RAB) Comments.</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>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <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>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</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>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</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>
C.5	<p>Troubled PHA.</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 type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing (AFFH).

Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal: Educate landlords regarding fair housing

Describe fair housing strategies and actions to achieve the goal

Conduct a broad-based educational campaign to counter misperceptions around affordable, accessible housing.

Fair Housing Goal: Expand fair housing outreach, education, and enforcement

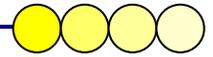
Describe fair housing strategies and actions to achieve the goal

Institute innovative ways to conduct outreach and education, develop an online education and training program in English and Spanish. Provide referrals to HUD and FHAP agencies for investigations of alleged fair housing violations.

Fair Housing Goal: Prevent Involuntary displacement and stabilize neighborhoods

Describe fair housing strategies and actions to achieve the goal

Provide Emergency Rental Assistance to families experiencing instability. Provide financial education and budget management to renters and homeowners to ensure long term stability.



B.1 – PLAN ELEMENTS – Revision of Existing PHA Plan Elements

The following PHA Plan elements have been revised by IL056 Lake County Housing Authority [LCHA]

Statement of Housing Needs and Strategy for Addressing Housing Needs

In conjunction with the goals of the Lake County Board's 2020-2024 Strategic Plan and its Housing and Community Development Consolidated Plan, the Lake County Housing Authority continues to work towards "*Building Healthy, Inclusive & Resilient Communities.*" Currently in Lake County there is a great need for additional affordable housing units, modernization of existing units and re-investment in underserved areas.

LCHA continues to address jurisdictional needs and HUD priority needs, by working together with our local municipalities. More specifically utilizing our federal special program vouchers which include Emergency Housing Voucher's targeted toward domestic violence victims, VASH Veteran Homeless Vouchers and our Family Reunification Vouchers together with Lake County's homeless service programs as a multifaceted approach to serving our jurisdictions most vulnerable families.

LCHA continues to build affordable housing through its project-based voucher program creating several partnerships and expanding development of affordable housing. LCHA is on target in CY2023 through 2024 to project base approximately 100 vouchers in 3 new developments of which will have a direct impact on poverty deconcentration efforts and increased affordable housing units.

LCHA has gone above and beyond administering the Federal Emergency Rental Assistance (FERA) program grant monies, and year to date have assisted 2180 households, consisting of \$13,000,000.00 from April 2021 through December 2022. With that program coming to an end and knowing that Lake County residents are still in need, LCHA has entered into an intergovernmental agreement with Lake County Government creating the Lake County Rental Assistance [LCRA] grant program consisting of \$2M to directly assist residents still facing housing instability and eviction.

LCHA continues to aggressively address voucher utilization. LCHA is in the process of exhausting its waiting list with the intention of reopening it before FYE23. As of April 4, 2023, LCHA has over 1,500 applicants on all [including special programs] Section 8 waiting lists. The current make-up of the Authority's applicants demonstrates extremely low-income households (86%) continue to be at the income level with the highest need for affordable housing. The waiting list data also confirms the need to assist a variety of households with differing demographics, including those with special needs (12% disabled head of households) and low-income seniors (6% head of households) on fixed incomes. LCHA actively engages in affirmative marketing and collaborating with local agencies that assist seniors and persons with disabilities and continuing outreach to private property owners for promotion of the Section 8 program.

As of April 2023, the Public Housing waiting lists total almost 3,000 applicants. The waiting lists are currently closed to better assist those on the lists already. All have reported their income to be at extremely low-income levels, which demonstrates the need for affordable housing. The Public Housing Program consists of elderly buildings and family scattered site homes throughout the county. Of the 3,000 applicants, 23% are elderly, 44% are disabled and there are over 500 applicants currently living within Lake County.

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

Public Housing

Deconcentration: If at any time, one of LCHA's public housing properties has an average tenant income more than 15 percent higher than the LCHA-wide average income, by bedroom size extremely low and very low-income applicants will be targeted for admission until it is within 15 percent of LCHA-wide average income. In addition, LCHA may offer voluntary transfers from higher income properties to lower income properties to help achieve deconcentration goals.

Affirmative Fair Housing Marketing and Outreach Procedures

When the waiting list is open LCHA will conduct affirmative marketing as needed to ensure that the waiting list includes a mix of Applicants with races, ethnic backgrounds, ages, and disabilities proportionate to the mix of those groups in the eligible population of Lake County. LCHA will review the factors regularly to determine the need for and scope of marketing efforts.

All marketing efforts will include outreach to those least likely to apply. LCHA may designate sites for accepting applications in addition to accepting on-line applications. LCHA staff will be available at these sites to assist Applicants in completing the housing application documents. If additional applications are required to attain any of the objectives established in this Policy, LCHA will engage in outreach efforts directed toward potential Applicants who might fulfill the need.

Income Targeting Requirements

LCHA will ensure that at least 40 percent of Families admitted to public housing in any year have incomes at or below the Federal "extremely low income" limit. HUD establishes income limits and revises them annually to ensure that federal rental assistance is provided only to low-income families. Except under limited circumstances, the Applicant Family's Annual Income must not exceed the applicable income limit that HUD establishes and publishes for each county or Metropolitan Statistical Area (MSA) in the country. The income limits are based on percentages of the median income of the geographic area for which the limit is established and are adjusted for family size.

Housing Choice Voucher Program – MTW

Utilizing the Landlord Incentive Program, LCHA plans to gain new landlords in opportunity areas to increase options for voucher families with the hope that the families will be closer to better employment opportunities and strive for self-sufficiency.

Only rental units in opportunity areas will be able to participate in the Landlord Incentive MTW activities. Opportunity areas are defined by HUD's deconcentrating initiatives where the property is located in a census tract that is considered low poverty.

The property must be located in a census tract where less than 10% of the residents live below the poverty level. The poverty level is determined by the most recent US Census.

Financial Resources

FY2024 Planned Financial Sources and Uses <i>Estimates from previous years funding</i>		
PHA Anticipated Resources	Planned Dollar Amounts	Planned Uses
Annual Contributions for S8 Tenant-Based Assistance (2024)	\$22,291,661	3256 Is the maximum number of low-income families that can be served (based on PIC data at time of submission)
Public Housing Operating Fund	\$310,000	Operations
Public Housing Capital Fund	\$1,500,000	Various Projects as noted in latest EPIC submission
Other Federal Grants		
Family Self Sufficiency Grant	\$250,045	Family Self Sufficiency HCV & PH
Ross Service Coordinator	\$68,000	Public Housing Self Sufficiency
RADON Remediation Grant	\$593,670	Public Housing Radon Remediation
FCC-ACP Grant	\$167,383	Public Housing Internet
Prior Year Capital Funds <i>Un-Disbursed</i>		
IL01P056501-20	\$413,106.17	Public Housing General Capacity Activity – planned activities
IL01P056501-21	\$1,139,788.30	Public Housing General Capacity Activity – planned activities
IL01P056501-22	\$1,081,847.90	Public Housing General Capacity Activity – planned activities
IL01P056501-23	\$1,578,115.00	Public Housing General Capacity Activity – planned activities
Public Housing Tenant & Miscellaneous Income		
Rental Income	\$1,600,500	Public Housing Operating Expense
Miscellaneous Income	\$125,000	Public Housing Operating Expenses
Demo/Dispo Funds	\$2M	Restricted development

Rent Determination

Public Housing Over-income tenants

If a Tenant's projected income at the time of annual reexamination or interim adjustment exceeds the income limit for continued occupancy (120 percent of Area Median Income, adjusted for family size) the LCHA will inform the Tenant that if their income continues to exceed this income limit at their annual reexamination for two more consecutive years the Tenant must move out of public housing in six months.

Operations and Management

Throughout the year LCHA has evaluated and reorganized to meet the needs of our clients. We continue to focus on excellence with our program management and administration. We continue to improve operational efficiencies and maximize MTW flexibility to help expand affordable housing throughout the jurisdiction.

LCHA conducts annual meetings with residents to discuss the residents' physical needs within the units. LCHA uses tenant input to create a preventative maintenance plan that feeds directly into our capital plan. While the LCHA larger properties (high/low rises) are of a pivotal age, we continue to maintain safety and HUD compliance on any environmental concerns (encapsulated asbestos, lead based paint, etc.) along with upgrading major systems as funding allows (hot water heaters, windows, siding, plumbing, elevators, etc.). LCHA maintains a strict pest control policy with routine monthly inspections and treatments as necessary.

Community Service and Self-Sufficiency Programs

The Family Self-Sufficiency (FSS) program of Lake County Housing Authority is voluntary program to assist tenants who have a Housing Choice Voucher or live in public housing that enables families to increase their earned income and reduce dependency on welfare assistance and rental subsidies. LCHA's FSS team hosts multiple workshops throughout the year both in person and online for maximum attendance. Workshops include Consumer Credit Counseling Services of Northern Illinois and presentations on the topics of credit and budgeting. LCHA shares our Family Self-Sufficiency Program at all voucher briefings; and flyers advertising FSS go out in the monthly recertification packets. For 2022 FSS Grant closure LCHA served 177 participants with the following statistics:

- Employed: 109
- Full Time: 75
- Part Time: 34
- Average Hourly Wage: \$18.12
- Average Annual Wage: \$34,228.74
- 37 participants are enrolled in some type of education program.
- Associate degree: 7
- Bachelor's degree: 4
- Master's degree: 3
- Trade/Vocational Certificate: 23
- Average FICO Credit Score: 631.89
- Average Trans Union Score: 613.34
- Average Experian Credit Score: 581.17
- Average Equifax Credit Score: 614.27
- 88 participants have a checking account.
- 48 participants have a savings account.
- 10 participants have a retirement account.
- One participant has an education savings account.

Resident Opportunity and Self-Sufficiency [ROSS]: LCHA participates in the ROSS grant program and has a full-time staff member dedicated to the Service Coordinator role. LCHA's ROSS Coordinator works in tandem with our FSS program complimenting each other's offerings. LCHA's ROSS Coordinator plans, develops, and coordinates social service programs for our residents including connecting residents to other social service

delivery agencies and assist individuals and families to comply with the Housing Authority and HUD rules and regulations. LCHA RC assists residents with launching opportunities for education, training, supportive services, and communications for senior residents.

Housing Counseling: LCHA offers certified HUD Housing Counselors that offer education and assistance in the following topics:

- Budgeting & Banking / Financial Literacy
- Credit Repair
- Community Resources
- Downpayment Assistance
- Fair Housing
- Fair Lending
- Foreclosure Prevention
- Homelessness Prevention
- Landlord's and Tenant's Rights & Responsibilities
- Mortgage Default Prevention
- Pre-Purchase / Home Buyer
- Rental Counseling
- Savings & Spending Plans
- Scam Prevention

Other Amenities: LCHA properties have green outdoor space/gardens, community rooms with kitchens, library space, free TV, onsite laundry rooms, reading materials and many programs offered on site to assist residents. LCHA has security surveillance systems and key fob entry.

Safety and Crime Prevention

LCHA has the opportunity to expand its Safety and Crime Prevention strategies by strategically utilizing its Capital Funds. We are in the process of contracting with our local sheriff's department to conduct safety patrols and increase their presence in our high traffic properties. This will include doing routine drive abouts and patrolling hallways as necessary. LCHA continues to add and upgrade its safety surveillance system.

VAWA: Lake County Housing Authority is committed to preserving the peaceful enjoyment of all communities. LCHA is cognizant of actions that may pose a threat related to domestic violence, dating violence or stalking. In compliance with the Violence Against Women Act and Justice Department Reauthorization Action of 2013 (VAWA), LCHA will not terminate the lease or evict victims of criminal activity related to their victimization.

Adhering to the Public Law 109-162, LCHA's policies safeguard against denial of program assistance for an applicant or participant [that] is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant otherwise qualifies for assistance or admission. This applies to all LCHA housing programs.

The Low-Income Public Housing program and the Section 8 Housing Choice Voucher program process enable LCHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking by connecting families with local agencies and resources equipped with trained professionals able to

assist with their needs. LCHA refers families to A Safe Place (provider of services exclusively addressing domestic violence in Lake County, Illinois).

LCHA partners with A Safe Place and Lake County Crisis Center Treatment and Prevention of Domestic Violence Inc., by contracting 37 Project Based Vouchers to developments owned by A Safe Place. In addition, LCHA has specialized Family Unification Program (FUP) vouchers which assist displaced families, often of which are domestic violence victims.

LCHA complies with all notification requirements by displaying VAWA materials at all administrative sites along with its website. All adverse action taken [denials or terminations] are compliant with VAWA notification requirements as stated in 24 CFR 5.20059(a). LCHA exceeds this requirement by providing all applicants and program participants with information on social service agencies specializing in abuse. LCHA provides notification of the VAWA in all Section 8 recertification and briefing materials and all Low-Income Public Housing admission and recertification materials.

Asset Management

LCHA has an extensive listing of projects planned to preserve our Public Housing developments. Outside of the Section 18/Demolition and Disposition projects for AMP 4 & 5, LCHA will be focusing on major system replacements such as:

- Elevators replacement
- Full building plumbing replacement
- Roof replacement with Solar considerations
- Windows, siding, and tuck pointing
- Concrete replacement of patios and sidewalks
- Creating additional ADA compliant units

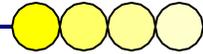
Please see our most recent capital fund project submission.

Substantial Deviation & Significant Amendment/Modification

See Attachment B.1.b.



Lake County Housing Authority
33928 North U.S. Highway 45
Grayslake, IL 60030



DEFINITION OF SUBSTANTIAL AMENDMENT AND
SIGNIFICANT AMENDMENT/MODIFICATION
Fiscal Year 2023 5-YEAR & ANNUAL PLAN

STATEMENT OF SUBSTANTIAL DEVIATION AND SIGNIFICANT AMENDMENT/MODIFICATION

In accordance with HUD regulations in 24 CFR 903.7(r) and 24 CFR 905.3, the Lake County Housing Authority (LCHA) has defined the basic criteria that will be used for determining:

Substantial deviation from its 5-Year Plan.

Significant amendment or modification to the 5-Year and Annual Plans; and

Significant amendment or modification to the Capital Fund Program (CFP) 5-Year Action Plan.

Amendments, deviations, or modifications to the agency plan which fundamentally alter the mission, goals, objectives or plans of the LCHA will require formal approval from the Board of Commissioners. Prior to implementing changes that meet such criteria, the LCHA will submit for HUD's approval a revised plan(s) that meets full public process requirements.

Criteria for defining "Substantial Deviation" from the 5-Year Plan

A change in federal law takes effect and, in the opinion of LCHA, it creates substantial obligations or administrative burdens beyond the programs under administration, excluding changes made necessary due to insufficient revenue, funding or appropriations, funding reallocations resulting from modifications made to the annual or five-year capital plan or due to the terms of a judicial decree

All amendments, deviations, or modifications to the agency plan which fundamentally alter the mission, goals, objectives or plans of the LCHA

Criteria for defining "Significant Amendment or Modification" to the 5-Year and PHA Annual Plans

Changes to rent, admission and/or occupancy policies, or the organization of waiting lists that will impact more than 10% of applicants or households assisted under agency programs.

Criteria for defining "Significant Amendment or Modification" to the CFP 5-Year Action Plans

Proposed demolition, disposition, homeownership, Capital Fund Financing, development, or mixed finance proposals will be considered significant amendments to the CFP 5-Year Action Plan.

Addition of non-emergency work items not included in the current CFP Annual

Statement or CFP 5-Year Action plan that exceeds \$100,000.00.

Exceptions

Changes under the above definitions that are required due to HUD regulations, federal statutes, state, or local laws/ordinances, or as a result of a declared national or local emergency will not be considered substantial deviation or significant amendment/modification.

Changes under the above definitions which are funded by any source other than federal funds will not require Plan amendment or modification.

Discretionary or administrative amendments consistent with the LCHA's stated overall mission and objectives will not be considered substantial deviations or modifications.

In addition to the criteria established by the PHA, a proposed demolition, disposition, homeownership, RAD conversion, Capital Fund Financing, development, or mixed finance proposal is considered by HUD to be significant amendment to the CFP 5-Year Action Plan based on the Capital Fund Final Rule.

B.2 – PLAN ELEMENTS – New Activities

IL056 Lake County Housing Authority [LCHA] intends to undertake the following new activities in the PHA’s current and upcoming FYB 10.1.2023.

Mixed Finance Modernization or Development.

Mixed Finance allows public housing authorities to combine HUD Capital Fund Program with other public, private, and non-profit sources to create public housing units in developments that also include private affordable housing units. LCHA provides decent and affordable housing in a safe and secure living environment for extremely low, low, and moderate-income residents throughout the jurisdiction of Lake County. To fulfill this mission, LCHA must preserve its aging housing portfolio through timely maintenance and modernization of its developments.

Demolition and/or Disposition.

LCHA’s repositioning plan:

Repositioning Assistance: In coordination with the U.S. Department of Housing and Urban Development, Strategic Plan 2018-2022, Lake County Housing Authority will continue to focus on resolutions to the struggles of the Lake County community to find affordable housing.

Lake County Housing Authority must move away from the policies and programs of the past and develop an innovative approach that is more responsive to the community; that anticipates the public housing essentials of the future while addressing current needs. In devising a strategic plan, LCHA will examine:

- Capital needs of property
- Cost to operate
- Future HUD funding potential
- Market demand
- Existing debt or other obligations

LCHA will facilitate the preservation, rehabilitation, or demolition of units by utilizing existing HUD provided tools:

- Rental Assistance Demonstration (RAD)
- Demolition & Disposition (Section 18)
- RAD/Section 18 Blends
- HUD’s Subject Matter Experts (SMEs)

By implementing the above, LCHA will deliver units that are in better physical condition and provide long-term availability of affordable housing and rental assistance in the local community.

Background: LCHA began this process with 496 units (based on 2018 RAD Rent table). The Lake County Housing Authority wants to explore options for converting its elderly/disabled development, consisting of 207 units. Additionally, the LCHA wants to know what choices under the options we have for two scattered-site properties,

totaling 61 single-family homes. *The Repositioning Panel advises that LCHA has several options to consider for its portfolio and could do them in different phases.*

First LCHA- Scattered Site units (161 single-family homes)

- Submit a Section 18 application under Scattered Sites if the units meet the definition of scattered sites. LCHA would have to demonstrate they are unable to maintain the units as public housing. The units must also be in non-contiguous buildings with four or fewer units. Additionally, the LCHA must have a relocation plan with the option for residents to remain using Project-Based Vouchers (PBVs) or Housing Choice Voucher (HCV).
- LCHA could dispose of the properties to a third-party entity under state law, including a non-profit, and could retain ownership or control. The options discussed during the call included:
 - Selling the property at Fair Market Value and use the proceeds to maintain other LCHA PH properties.
 - Disposing of the property below fair market (Commensurate public benefit. Use restriction required)
 - Creating a local Homeownership program under Section 32 (Exploring under AIM North Nonprofit).
- TPV s are available for all units occupied by assisted tenants within the previous 24-months at the HUD's Special Application Center (SAC) approval time.
 - Eligible to project-based 100% of property; however, families could request a voucher to move after one year.
 - LCHA has seven (7) over-income families that would not be eligible for Tenant Protection Voucher (TPV) under Section 18. LCHA would have to provide comparable housing for the seven families.
- Under this option, the Panel advised LCHA can submit one application for all the units at one time. If LCHA plans to dispose at different times, may consider putting properties in batches and submitting separate applications.

UPDATE: LCHA has begun the Section 18 process for the 161 Single-family homes and as of this submission have officially disposed of 22 with 7 in process and LCHA has received 24 TPV's thus far.

Second LCHA -Elderly /Disabled Properties (2 sites totaling 160 units)

- LCHA wants to explore options for a blended conversion for a mixed development.
- These properties would be strong Rental Assistance Demonstration (RAD) candidates.
- Additionally, the Panel advised LCHA they may want to consider submitting a Section 18 under the RAD/Section 18 blend if the units will be substantially rehabilitated without the use of 9% Low Income Housing Tax Credits. Substantially rehabilitated means hard construction costs over 60% of Housing Construction Costs (published by HUD).
- If eligible, SAC will approve the disposition of 25% of the project units under Section 18 and replace those units with Section 18 TPV s. If the properties are in an Opportunity Zone, they may qualify for the RAD \$100 PUM rent boost for a PBRA conversion.
- TPV s will be issued based on the occupancy of the public housing units being removed through Section 18 when the SAC application is approved. Those vouchers may be project-based. RAD units are not eligible for TPV s.

Remaining 175 Units

- If LCHA submits applications based on the LCHA one and LCHA two options, they would have 175 PH units remaining and consider submitting an application under Streamlined Voluntary Conversion (SVC) for the remainder of its inventory. Under SVC, conversion to PBV requires tenant consent. Tenants have the right to remain in their unit with the TPV, or take the TPV and rent in the private market, or accept a PBV and remain in the unit (must be in writing)
- LCHA could remove the remaining 175 units via the RAD/Section 18 Close-out Blend, where 125 units convert through RAD, and the last 50 units are converted through Section 18. The LCHA would project based the TPV s obtained for the 50 Section 18 units, and the LCHA would not need tenant consent.

Additional Takeaways:

- LCHA wants to continue assessing what options are best for the community and the families' needs before they consider selling units at fair market value or PBV.
- Only applications submitted through Section 18 are eligible for ARF and DDTF. RAD and Streamlined Voluntary Conversions are not eligible.
- Under RAD, LCHA can maintain PH reserves after conversion. Under Section 18 or SVC, LCHA has up until the transaction's closing to spend down any PH reserves. LCHA cannot use PH reserves to support any Section 8 projects.
- The LCHA is in the process of writing a Request for Proposal (RFP) for a (Physical Needs Assessment (PNA).

Next Steps:

- LCHA will have a PNA completed for its public housing properties (Sr. Buildings)
- LCHA will follow-up with the Chicago Field Office (FO) with any additional questions, comments, or concerns.

Designated Housing for Elderly and/or Disabled Families.

Re-submitted for renewal of Public Housing near elderly buildings.

Conversion of Public Housing to Tenant-Based Assistance.

LCHA has no required conversions, however LCHA will be evaluating Public Housing to Tenant Based Assistance conversion options as noted in the Demolition and Disposition section of this document and per the analysis of the Repositioning Panel consulted in LCHA's strategic plan.

Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.

LCHA will be evaluating Public Housing to Tenant Based Assistance conversion options as noted in the Demolition and Disposition section of this document and per the analysis of the Repositioning Panel consulted in LCHA's strategic plan.

Occupancy by Over-Income Families.

If a Tenant's projected income at the time of annual reexamination or interim adjustment exceeds the income limit for continued occupancy (120 percent of Area Median Income, adjusted for family size) the LCHA will inform the Tenant that if their income continues to exceed this income limit at their annual reexamination for two more consecutive years the Tenant must move out of public housing in six months.

Occupancy by Police Officers.

LCHA continues to evaluate the safety needs of each development. Currently LCHA will be contracting with local law enforcement for dedicated security patrols. Should there be an escalation in crime or need for additional safety measures, LCHA will seek approval from HUD to allow a police officer to occupy specifically designated public housing units. LCHA will determine exact units based upon property, tenant attrition and specialized needs and will specify those units when seeking written approval from HUD. LCHA will enter a Memorandum of Understanding, or other form of contractual agreement, between PHA and Local Law Enforcement Agencies or Use Agreement specifying the terms and requirements of the officer residing in the designated unit.

Under 24 CFR 960.505, PHAs are required to provide the HUD Field Office with a statement indicating that occupancy by Police Officers is necessary to increase security for public housing residents. The terms and conditions of the Police Officer's tenancy must be included in the PHA Plan, along with a statement that such occupancy is needed to increase security for public housing residents.

As per the requirements, the unit will be used as a full-time dwelling unit, and a written lease will be executed for the unit. Units that house Police Officers who must actively provide security to (including patrolling) the development(s) as a condition of tenancy, may be eligible for full Operating Fund Grant. If the community conditions that created the need to house Police Officers in the development cease to exist, LCHA will make these units available to eligible program participants.

Non-Smoking Policies.

LCHA will be partnering with the Lake County Health Department [LCHD] to institute a smoking cessation program within all LCHA our public housing properties. LCHA will phase in the program beginning with our densest developments [Shiloh and Beach Haven]. Communication documents are under way [door hangers, postcards, and flyers] which will include a hotline number for non-smoking residents to call for support when they are affected by others smoke. This will result in the Health Department assisting LCHA to track smoking offenders and simultaneously offering cessation services to the offenders.

LCHD will provide onsite free smoking cessation classes to our residents. LCHD will work with property managers and the ROSS Coordinator to facilitate this program. LCHA adheres to HUD's Smoke-free policies in public housing (NOTICE: PIH-2012-25).

Project-Based Vouchers.

The PHA plans to exercise the MTW expansion to Project Base up to the lower of 50% of the total authorized units or 50% of the Budget Authority.

LCHA also plans to adopt and implement alternative competitive processing in awarding Project Base Vouchers as allowed in the MTW expansion. Developments that have been awarded funding through Low Income Housing Tax Credits, HOME funding, or CDBG funding will be accepted as an alternative to a Request for Proposal to Project Base a development.

LCHA has 539 current Project Based Vouchers with 63 in process as noted below:

Development	# of Vouchers	Status
A Safe Place I	17	HAP
A Safe Place II	20	HAP
Brookstone Coles Park	131	HAP
Colonial Park Apts.	60	HAP
Fairhaven Crossing	14	HAP
Library Lane	135	HAP
Regency Coles Park	48	HAP
Woodstone Apts.	59	HAP
Lake Front Sr Res	25	HAP
Tiffany Apts.	28	HAP
Lake Zurich	2	HAP
Mundelein Sr. Apts.	45	<i>Pending</i>
Beech Street Sr. Lofts	18	<i>Pending</i>
TOTAL PBV	539[+63] = 602	

Units with Approved Vacancies for Modernization.

Under 24 CFR 990.145, PHAs are eligible to receive Operating Fund grant funding for certain vacant public housing units that are under ACC. Each of these approved vacancies requires that the PHA request an approval Letter from the HUD Field Office. LCHA intends to seek HUD approval for units in its AMP 4 and AMP 5 that require significant modernization. LCHA intends to target ten (10) units where the unit is required to be vacant to accomplish the modernization (i.e., renovating the kitchen/bathroom where it would leave the tenant without either facility would require the unit to be vacant or address any health hazards). LCHA will list specific units within its request for approval. Units will be selected and or approval will be requested based on tenant attrition and priority of unit needs.

This modernization work will be accomplished using both Capital and Operating Funds. Upon completion of all modernization work, that required the unit to be vacant, even if additional modernization work continues, LCHA will either re-occupy the unit by an eligible family or place the unit in Vacant status. Modernization plans can be referenced in our most recent HUD approved Capital Fund submission.

C – Other Documents and/or Certification Requirements

C.1 – Resident Advisory Board (RAB) Comments

Meetings in progress – Information Forth Coming

C.2 – Certification by State or Local Officials

Signed form to be completed.

C.3 – Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan

Signed form to be completed upon board approval of plan.

C.4 – Challenged Elements

Any challenged elements received regarding the PHA activities listed in this draft document shall be included considered and included upon the board approval of the plan.

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, _____, the _____
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal
year **2024** of the Lake County Housing Authority is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or
State Consolidated Plan.

**In conjunction with the goals of the Lake County Board's 2020-2024 Strategic Plan and its Housing and
Community Development Consolidated Plan, the Lake County Housing Authority continues to work
towards "Building Healthy, Inclusive & Resilient Communities." Currently in Lake County there is a great
need for additional affordable housing units, modernization of existing units and re-investment in
underserved areas.**

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:

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

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the 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 ___ 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning October 1, 2023, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan 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 (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan 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 Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency 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), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its 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 maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD’s Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 11. The 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.
 12. The 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.
 13. The 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.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. 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.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Lake County Housing Authority

IL056

PHA Name

PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2024

5-Year PHA Plan for Fiscal Years 20____ - 20____

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 Executive Director

Name Board Chairman

Lorraine Hocker

Dr. H. Jordan Lee Jr.

Signature

Date

Signature

Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.

DRAPET

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

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

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

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

Sections of the MTW Supplement:

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

Information to be Collected for MTW Activities

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

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

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

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

Questions

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

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

DRAFT

MTW Supplement to the Annual PHA Plan

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

OMB No. 2577-0226
Expires: 03/31/2024

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

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

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

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

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

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

C.	MTW Waivers and Associated Activities.
	NOTE: MTW agencies are reminded that all MTW Waivers and associated activities must be implemented in accordance with the MTW Operations Notice and within its safe harbors unless a Safe Harbor or Agency-Specific Waiver approval is provided by HUD, in which case, the activity utilizing the Safe Harbor or Agency-Specific Waiver must be implemented in accordance with the terms of the approval.
Screener	<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"> • Currently Implementing • Plan to Implement in the Submission Year • Will be Discontinued in the Submission Year • Was Discontinued in a previous Submission Year • Not Currently Implemented
Core Questions	The following core questions apply to all of the MTW Waivers and associated activities listed in the MTW Operations Notice. The core questions collect basic information about any MTW activity proposed or implemented by MTW agencies.

Text	Input options and instructions
Narrative. 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 just write one narrative explaining that it covers both programs.]
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) <input type="checkbox"/> Cost effectiveness <input type="checkbox"/> Self-sufficiency <input type="checkbox"/> Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	(Check at least one) <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
Different policy by household status/family types/sites? 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>
Household Status. 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>Family Types. 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>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For PH activities: <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>For HCV activities: <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]: 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 [If Yes]: Upload Hardship Policy [If No, skip below Hardship Policy questions] [If Already provided, the agency has already provided the Hardship Policy under another activity and indicated that the policy is also applicable to this activity.]</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 [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?	Yes/No [If Yes, then a further question pops up.]: What considerations led the MTW agency to modify the hardship policy? [Text box]
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?	<input type="text"/> [Numerical entry only] [if number > 0, further questions pop up]: <input type="text"/> How many hardship requests were approved? [Numerical entry only] <input type="text"/> How many hardship requests were denied? [Numerical entry only] <input type="text"/> How many are pending? [numerical entry only]
Does the MTW activity require an impact analysis?	Yes/ No /Already provided [If Yes]: Upload Impact Analysis [If No, skip the below Impact Analysis questions] [If Already provided, the agency has already provided the impact analysis under another activity and indicated that the policy is also applicable to this activity.]
Does the impact analysis apply to more than this MTW activity? 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.)	Yes/No [If yes, a list will be presented to select the applicable MTW activities]
Based on the Fiscal Year goals listed in the activity’s previous Fiscal Year’s narrative, provide a description about what has been accomplished or changed during the implementation.	[Text box]
Please provide an explanation as to why the activity was discontinued or will be discontinued.	[Will only apply if “Will be Discontinued in the Submission Year” or “Was Discontinued in a previous Submission Year” is selected in the screener.] [Text box]

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

C.1	Tenant Rent Policies
------------	-----------------------------

1.a., 1.b. - Tiered Rent (PH & HCV)	Input options and instructions
Please describe how the income bands are structured.	[Text box]
Please upload the tiered rent policy table that shows the income bands.	[Upload document]
What is the income basis for assigning households to income bands?	<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”

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	Description [Text box] Stepped rent schedule [Upload document]

1.c., 1.d. - Stepped Rent (PH & HCV)	Input options and instructions
upload a document that presents the stepped rent schedule in the form of a table.	
If a household progresses all the way through the stepped rent schedule, what will their status be?	<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]
1.e., 1.f. - Minimum Rent (PH & HCV)	Input options and instructions
How much is the minimum rent or minimum Total Tenant Payment (TTP)?	\$ _____ [Note: If the MTW agency indicates they have a minimum rent that applies only to particular subgroups, as determined by responses to core questions, the question gets asked for each subgroup.]
1.g., 1.h. - Tenant Payment as a Modified Percentage of Income (PH & HCV)	Input options and instructions
What percentage of income will equal the Total Tenant Payment (TTP)?	_____ %
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"
1.i., 1.j. - Alternative Utility Allowance (PH & HCV)	Input options and instructions
Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.	[Text box]
1.k., 1.l. - Fixed Rents/Subsidy (PH & HCV)	Input options and instructions
Describe the method used to establish the fixed rents.	[Text box]
How many households are currently subject to this policy?	[Text box]

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

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

1.m., 1.n. - Utility Reimbursements (PH & HCV)	[No custom questions for this activity.]
1.o. - Initial Rent Burden (HCV)	Input options and instructions
If the MTW agency plans to implement a new maximum income-based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?	_____ %
1.p., 1.q. - Imputed Income (PH & HCV)	Input options and instructions
Does the imputed income policy assume a set number of hours worked per individual or per household?	(Check one) <input type="checkbox"/> Per individual <input type="checkbox"/> Per household
How many hours per week are assumed?	[Number entries between 0 and 15 or 0 and 30, as appropriate, allowed]
What is the assumed wage rate?	[Must be a number less than or equal to the federal minimum wage]

1.p., 1.q. - Imputed Income (PH & HCV)		Input options and instructions
How many households are currently subject to this policy?		_____ [number]
1.r., 1.s. - Elimination of Deduction(s) (PH & HCV)		Input options and instructions
Which deduction(s) will be eliminated, modified, or added?		(Check all that apply) <input type="checkbox"/> Dependent allowance <input type="checkbox"/> Unreimbursed childcare costs <input type="checkbox"/> Other (please explain)
1.t., 1.u. - Standard Deductions (PH & HCV)		Input options and instructions
How much will the single standard deduction be in the Fiscal Year?		\$ _____
1.v., 1.w. - Alternative Income Inclusions/Exclusions (PH & HCV)		Input options and instructions
What inclusions or exclusions will be eliminated, modified, or added?		[Text Box]
C.2	Payment Standards and Rent Reasonableness	
2.a. - Payment Standards – Small Area Fair Market Rents (FMR) (HCV)		Input options and instructions
Please explain the payment standards by ZIP code or “grouped” ZIP codes.		[Text box]
2.b. - Payment Standards – Fair Market Rents (HCV)		Input options and instructions
Please explain the payment standards by FMR.		[Text box]
2.c. - Rent Reasonableness – Process (HCV)		Input options and instructions
Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method.		[Text box]
2.d. - Rent Reasonableness – Third-Party Requirement (HCV)		Input options and instructions
Please explain or upload a description of the quality assurance method.		[Text box] and [Upload file] options
Please explain or upload a description of the rent reasonableness determination method.		[Text box] and [Upload file] options
C.3	Reexaminations	
3.a., 3.b. - Alternative Reexamination Schedule for Households (PH & HCV)		Input options and instructions
What is the recertification schedule?		(Check one) <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.		[Text box]
3.c., 3.d. - Self-Certification of Assets (PH & HCV)		Input options and instructions
Please state the dollar threshold for the self-certification of assets.		\$ _____

C.4	Landlord Leasing Incentives
------------	------------------------------------

4.a., 4.b., 4.c. - Vacancy Loss, Damage Claims, and Other Landlord Incentives (HCV)	Input options and instructions (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?	[Text box]
How many payments were issued under this policy in the most recently completed PHA fiscal year?	___ [number of payments]
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	\$ _____

C.5	Housing Quality Standards (HQS)
------------	--

5.a. - Pre-Qualifying Unit Inspections (HCV)	Input options and instructions
How long is the pre-inspection valid for?	___ [number of days]
5.b. - Reasonable Penalty Payments for Landlords (HCV)	Input options and instructions
What is the maximum penalty payment that can be made to a landlord under this policy?	[Text box]
How many penalty payments were charged under this policy in the most recently completed PHA fiscal year?	___ [number]
5.c. - Third-Party Requirement (HCV)	Input options and instructions
Please explain or upload a description of the quality assurance method.	[Text box] and [Upload file] options
5.d. - Alternative Inspection Schedule (HCV)	Input options and instructions
	[No custom questions for this activity.]

C.6	Short-Term Assistance
------------	------------------------------

6.a., 6.b. - Short-Term Assistance (PH & HCV)	Input options and instructions
What is the term of assistance?	___ [number of months]
How is the tenant contribution established for this program?	[Text box]
How many households do you expect to serve in this program in the Fiscal Year?	___ [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?	[Text box]
Please list any partner organizations and briefly note the services that each provides.	[Text box]

C.7	Term-Limited Assistance
------------	--------------------------------

7.a., 7.b. - Term-Limited Assistance (PH & HCV)	Input options and instructions
Does the term-limited assistance MTW activity exempt any type of household or individual other than the elderly or individuals with disabilities	Yes/No [If Yes]: Please describe the conditions for exemption. [text box]
Please describe how the MTW agency supports households to prepare for the end of assistance.	[Text box]
How many households are currently subject to this policy?	_____ [number]

C.8	Increase Elderly Age
------------	-----------------------------

8. - Increase Elderly Age (PH & HCV)	Input options and instructions
What is the new definition of elderly?	___ years old [Numerical entry allowed between 62 - 65]

C.9	Project-Based Voucher Program Flexibilities (PBV)
------------	--

9.a. - Increase PBV Program Cap (HCV)	Input options and instructions
What percentage of total authorized HCV units will be authorized for project-basing?	_____ %

9.b. - Increase PBV Project Cap (HCV)	[No custom questions for this activity.]
--	--

9.c. - Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement (HCV)	[No custom questions for this activity.]
--	--

9.d. - Alternative PBV Selection Process (HCV)	[No custom questions for this activity.]
---	--

9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Input options and instructions
How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?	___ Units
How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?	___ Units
How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?	___ Units
How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?	___ Units

9.f. - Increase PBV Housing Assistance Payment (HAP) Contract Length (HCV)	[No custom questions for this activity.]
---	--

9.g. - Increase PBV Rent to Owner (HCV)	[No custom questions for this activity.]
--	--

9.h. - Limit Portability for PBV Units (HCV)	[No custom questions for this activity.]
---	--

C.10	Family Self-Sufficiency Program with MTW Flexibility (Traditional)
-------------	---

10.a. - Waive Operating a Required FSS Program (PH & HCV)	[No custom questions for this activity.]
--	--

10.b. - Alternative Structure for Establishing Program Coordinating Committee (PH & HCV)	Input options and instructions
Please describe the alternative structure and how it is designed to secure local resources to support an MTW Self-Sufficiency program.	[Text box]

10.c. - Alternative Family Selection Procedures (PH & HCV)	Input options and instructions
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.	[Text box]

10.d. - Modify or Eliminate the Contract of Participation (PH & HCV)	[No custom questions for this activity.]
---	--

10.e. - Policies for Addressing Increases in Family Income (PH & HCV)	Input options and instructions
How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?	[Text box]

C.11	MTW Self-Sufficiency Program
-------------	-------------------------------------

11.a. - Alternative Family Selection Procedures (PH & HCV)	Input options and instructions
Will the MTW agency’s MTW Self-Sufficiency policy make the program mandatory for anyone?	Yes/No [If Yes]: Please describe the population group for whom participation in the MTW Self-Sufficiency program is mandatory. [Text box]

11.b. - Policies for Addressing Increases in Family Income (PH & HCV)	Input options and instructions
What is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program?	[Text box]

C.12	Work Requirement
-------------	-------------------------

12.a., 12.b. – Work Requirement (PH & HCV)	Input options and instructions
Does the work requirement MTW activity exempt any type of household or individual other than those required to be excluded through the MTW Operations Notice or those excluded as a reasonable accommodation?	Yes/No [If Yes]: Please describe the conditions for exemption. [Text box]
What counts as “work” under this the work requirement MTW activity?	[Text box]
How will the MTW agency monitor compliance with the work requirement MTW activity?	[Text box]
What supportive services are offered to support households to comply with the work requirement?	[Text box]
How does the agency address noncompliance with the work requirement policy?	[Text box]
How many households are currently subject to the policy?	_____ [number]
How many households in the most recently completed PHA fiscal year were sanctioned for non-compliance with the work requirement?	_____ [number]

C.13	Public Housing as an Incentive for Economic Progress
-------------	---

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

C.14	Moving On Policy
-------------	-------------------------

14.a. - Waive Initial HQS Inspection Requirement (HCV)	[No custom questions for this activity.]
---	--

14.b. - Allow Income Calculations from Partner Agencies (PH and HCV)	[No custom questions for this activity.]
---	--

14.c. - Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH & HCV)	[No custom questions for this activity.]
---	--

C.15	Acquisition without Prior HUD Approval
-------------	---

15. - Acquisition without Prior HUD Approval (PH)	[No custom questions for this activity.]
--	--

C.16	Deconcentration of Poverty in Public Housing Policy
-------------	--

16. - Deconcentration of Poverty in Public Housing (PH)	[No custom questions for this activity.]
--	--

C.17	Local, Non-Traditional (LNT) Activities
-------------	--

17.a. - Rental Subsidy Programs	Input options and instructions
Does the MTW activity apply to all LNT units/properties?	<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

17.b. - Service Provision	Input options and instructions
What types of services is the MTW agency providing?	[Text box]
How many households did the PHA provide services to in the most recently completed PHA Fiscal Year through this activity?	_____ [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)?	Yes/No [If yes, answer question below.] <input type="checkbox"/> # of persons receiving LNT services only in the most recently completed PHA fiscal year.

17.c. - Housing Development Programs

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

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

Question	[add name of development and address]			
MTW Role: Acquisition, Rehabilitation, New Construction?				
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"> • 80% of AMI 				
<ul style="list-style-type: none"> • 60% of AMI 				
<ul style="list-style-type: none"> • 30% of AMI 				
<ul style="list-style-type: none"> • Other 				

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

Question	[add name of development and address]			
MTW Role: Acquisition, Rehabilitation, New Construction?				
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"> 80% of AMI 				
<ul style="list-style-type: none"> 60% of AMI 				
<ul style="list-style-type: none"> 30% of AMI 				
<ul style="list-style-type: none"> Other 				

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

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

Question	[add name of development and address]			
MTW Role: Acquisition, Rehabilitation, New 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"> 80% of AMI 				
<ul style="list-style-type: none"> 60% of AMI 				
<ul style="list-style-type: none"> 30% of AMI 				
<ul style="list-style-type: none"> Other 				

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

Question	[add name of development and address]			
MTW Role: Acquisition, Rehabilitation, New Construction?				
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"> 80% of AMI 60% of AMI 30% of AMI Other 				

D. Safe Harbor Waivers.

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

Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?

No
 Yes [If yes, upload required information in a-g above for each Safe Harbor Waiver request]

E. Agency-Specific Waivers.

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

In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.

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

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]

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	#
Total Local, Non-Traditional Households	#

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

G.2 Establishing Reasonable Rent Policy.

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

G.3 Substantially the Same (STS) – Local, Non-Traditional.

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.	___ # 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.	___ # 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)?	Please include only those units that serve households at or below 80% of AMI in the table provided.

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

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

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

** The federal accessibility standard under HUD’s Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance. HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD’s Notice on “Instructions for use of alternative accessibility standard,” published in the Federal Register on May 23, 2014 (“Deeming Notice”) for purposes of Section 504 compliance, <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).

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

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

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

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

G.5	Housing Quality Standards.
------------	-----------------------------------

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

H.	Public Comments.
-----------	-------------------------

H.1	Input options and instructions
Please provide copy of all comments received by the public, 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

I	Evaluations.
----------	---------------------

I.1	Please list any ongoing and completed evaluations of the MTW agency’s MTW policies, that the PHA is aware of, including the information requested in the table below. In the box “title and short description,” please write the title of the evaluation and a brief description of the focus of the evaluation.
------------	--

Question	Input options and instructions
Does the PHA have an agency-sponsored evaluation?	Yes/No [If Yes]: Please complete the table below.

Table I.1 - Evaluations of MTW Policies

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

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

DRAFT

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
1. Tenant Rent Policies					
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		
2. Payment Standards and Rent Reasonableness					
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		
3. Reexaminations					
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		
4. Landlord Leasing Incentives					
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		
5. Housing Quality Standards (HQS)					
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		
6. Short-Term Assistance					
a. Short-Term Assistance (PH)	X	X	X	X	X
b. Short-Term Assistance (HCV)	X	X	X	X	X
7. Term-Limited Assistance					
Term-Limited Assistance (PH)	X	X	X	X	X
Term-Limited Assistance (HCV)	X	X	X	X	X
8. Increase Elderly Age (PH & HCV)					
9. Project-Based Voucher Program Flexibilities					
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		
10. Family Self-Sufficiency Program with MTW Flexibility					
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
11. MTW Self-Sufficiency Program					
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
12. Work Requirement					
a. Work Requirement (PH)	X	X	X	X	X
b. Work Requirement (HCV)	X	X	X	X	X
13. Use of Public Housing as an Incentive for Economic Progress (PH)					
	X	X	X		
14. Moving on Policy					
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		
15. Acquisition without Prior HUD Approval (PH)					
	X		X		
16. Deconcentration of Poverty in Public Housing Policy (PH)					
	X		X		
17. Local, Non-Traditional Activities					
a. Rental Subsidy Programs	X	X	X		
b. Service Provision	X	X	X		
c. Housing Development Programs	X	X	X		

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 (_____), 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.*