

Lake County Housing Authority – IL056

PHA Annual Plan -FYB 10.1.25

FY 26



“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

DRAFT

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

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs 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	PHA Name: <u>The Lake County Housing Authority</u> PHA Code: <u>IL056</u> PHA Type: <input type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10.1.25</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>427</u> Number of Housing Choice Vouchers (HCVs) <u>3282</u> Total Combined Units/Vouchers <u>3709</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission				
	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.				
	<input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)				
	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 type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input type="checkbox"/> <input checked="" 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 type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" 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 type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" 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 for updated Financial Resources.</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 type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan. 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. Please see HUD form 50075.2 for FY20xx-20xx approved on XX/XX/XX.</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>If yes, please describe:</p>
C.	Other Document and/or Certification Requirements.
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 checked="" type="checkbox"/> <input 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	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete</p>

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

Continue promoting fair housing laws and conduct a broad-based educational campaign to counter misperceptions around affordable and 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.

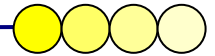
Fair Housing Goal: Prevent Involuntary displacement and stabilize neighborhoods

Describe fair housing strategies and actions to achieve the goal

When funding is available, provide emergency rental assistance to families experiencing instability. Provide financial education and budget management to renters and homeowners to ensure long term stability.

Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

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

**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]

Financial Resources

FY2026 Planned Financial Sources and Uses <i>Estimates from previous year's funding</i>		
PHA Anticipated Resources	Planned Dollar Amounts	Planned Uses
Annual Contributions for S8 Tenant-Based Assistance (2025)	\$36,204,935	3282 is the maximum number of low-income families that can be served (based on PIC data at the time of submission)
Public Housing Operating Fund	\$394,000	Operations
Public Housing Capital Fund	\$1,583,084	Various Projects as noted in the latest EPIC submission
Other Federal Grants		
Family Self-Sufficiency Grant	\$250,045 annually \$500,090	Family Self Sufficiency HCV & PH
Ross Service Coordinator	\$79,750 annually \$239,250	Public Housing Self-sufficiency
RADON Remediation Grant	\$179,890 annually \$593,670	Public Housing Radon Remediation
FCC-ACP Grant	\$167,383	Public Housing Internet
Prior Year Capital Funds <i>Un-Disbursed</i>		
IL01P056501-23	\$308,157	Public Housing General Capacity Activity – planned activities
IL01P056501-24	\$1,143,602	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

B.1.c. 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.

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 10.1.2025.

Mixed Finance Modernization or Development.

LCHA is currently under a Section 18 Demolition and Disposition plan. This plan involves the removal of more than 100 single-family public housing homes from the LCHA inventory. LCHA will consider utilizing proceeds from the plan in a mixed-finance project or development.

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, the 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; and 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 the Disposition plan with 496 units in 2020. 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)

- 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 Tenant Protection Vouchers (TPV) under the Housing Choice Voucher (HCV) program.
- 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 using the net 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).
- TPVs 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 a Tenant Protection Voucher (TPV) under Section 18. LCHA would have to provide comparable housing for the seven families.

UPDATE: LCHA has begun the Section 18 process for the 161 Single-family homes and as of this submission has officially disposed of 75 with 25 approved and LCHA has received 32 TPVs thus far.

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

- LCHA will continue to explore options for a blended conversion for a mixed development.
- These properties would be strong Rental Assistance Demonstration (RAD) candidates.
- Additionally, LCHA may 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 TPVs. If the properties are in an Opportunity Zone, they may qualify for the RAD \$100 PUM rent boost for a PBRA conversion.
- TPVs 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 TPVs.

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 are converted through RAD, and the last 50 units are converted through Section 18. The LCHA would project based on the TPVs obtained for the 50 Section 18 units, and the LCHA would not need tenant consent.

Additional Takeaways:

- LCHA will 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.

Next Steps: Option

- 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.

LCHA has submitted renewal elderly designation for seven (7) public housing buildings consisting of two Asset Management Developments (AMPs): IL056000003 and IL056000002.

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.

Public Housing Over-income tenants – see summary below and refer to the Admissions & Continued Occupancy Policy for detailed information.

LCHA is compliant with HOTMA provisions for 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 is contracting with local law enforcement for dedicated security patrols. Should there be an escalation in crime or the need for additional safety measures LCHA intends to seek HUD approval to utilize two (2) units as police units. We intend to host police units at Beach Haven Tower – 730 Golfview Dr. Round Lake Beach, IL 60073, and Shiloh Tower – 1525 27th St. Zion IL 60099.

LCHA will determine exact units based on 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 a 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. 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 a 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.

Project-Based Vouchers.

LCHA has exercised 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 602 current Project Based Vouchers with 153 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	HAP
Beech Street Sr. Lofts	18	HAP
Rosewood	153 *AHAP 2025	Pending
TOTAL PBV	602[+153] = 755 adjust after	

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 up to 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.

Other Capital Grant Programs.

LCHA intends to seek grant funding under the Emergency Safety and Security Grants.

B.3 - PROGRESS REPORT

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

The Lake County Housing Authority (LCHA) continues to make significant strides in achieving its goals, thanks to our ongoing partnership with the Lake County government. Together, we are dedicated to improving the response to the homeless crisis by leveraging LCHA's diverse special-purpose program options, including Mainstream, Emergency Housing Vouchers, VASH Vouchers, and, newly added in FY24, 15 Fair Share Vouchers, all of which target special needs populations.

One of our key initiatives, the Section 18 Demo/Disposition program, has shown remarkable progress. Over the past four years, we have successfully disposed of 75 single-family homes, with an additional 25 currently in progress. These homes have been sold to various parties, including affordable housing providers, investors with the intent to maintain the Tenant Protection Vouchers (TPV) under the Housing Choice Voucher (HCV) program, and in particularly satisfying transactions, to the families residing in the homes who can purchase them. This ensures the continuity of affordable housing options within Lake County. The proceeds from the sale of these homes have generated Tenant Protection Vouchers, which are now benefiting eligible families in need.

Looking ahead, LCHA remains committed to aggressively completing the Demo/Dispo program over the next four years. This initiative not only significantly reduces operational costs for the agency but also provides opportunities for further development using the proceeds from the program. Additionally, LCHA continues to build affordable housing through its project-based voucher program, fostering several partnerships and expanding the development of affordable housing.

Based on funding availability, LCHA plans to project-base approximately 200 vouchers in new developments, which will have a direct impact on poverty deconcentration efforts and increase the number of affordable housing units available.

Furthermore, LCHA has entered into an intergovernmental agreement with the Lake County Government, consisting of \$609,000 to directly assist residents still facing housing instability and eviction.

LCHA continues to aggressively address voucher utilization and has maintained a voucher utilization of 97%+ through calendar year 24 and in to 2025. LCHA has experienced a significant increase in area rents realizing an increase in the Per Unit Cost [PUC]. LCHA is currently operating in shortfall. As such, shortfall prevention strategies have been enacted.

Presently, there are approximately 630 applicants on the Housing Choice Voucher (HCV) waiting list. The current composition of the Authority's applicants underscores the pressing need for affordable housing, with 85% representing extremely low-income households, the demographic with the highest need. Furthermore, the waiting list data highlights the necessity to assist a diverse range of households, including 14% headed by disabled individuals with special needs and 4% comprising low-income seniors on fixed incomes. To address these needs, LCHA actively engages in affirmative furthering fair housing with its marketing and collaborates with local agencies that support seniors and persons with disabilities, while also continuing outreach efforts to private property owners to promote the HCV program.

The waiting lists for Public Housing total more than 4,000 applicants. One bedroom elderly/disabled lists are temporarily open. The Public Housing Program encompasses elderly buildings and family scattered-site homes throughout the county. Of the approximately 4,000 applicants, 17% are elderly, 34% are disabled, and over 87% are at an extremely low income level.

C – Other Documents and/or Certification Requirements

C.1 – Resident Advisory Board (RAB) Comments

Will be compiled after meetings.

C.2 – Certification by State or Local Officials

In process.

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

To be determined.

DRAFT

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:</p> <p> <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. </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:</p> <p> <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:</p> <p> <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.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>Yes/No [If Yes]:</p> <p>What is the status of the Safe Harbor Waiver request?</p> <p> <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. </p>
<p>Does this MTW activity require a hardship policy?</p>	<p>Yes/No/Already provided</p> <p>[If Yes]: Upload Hardship Policy</p> <p>[If No, skip below Hardship Policy questions]</p> <p>[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</p> <p>[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?
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.	
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.
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C.1	Tenant Rent Policies
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1.a., 1.b. - Tiered Rent (PH & HCV)	Input options and instructions
Please describe how the income bands are structured.	
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 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
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.	
1.k., 1.l. - Fixed Rents/Subsidy (PH & HCV)	Input options and instructions
Describe the method used to establish the fixed rents.	
How many households are currently subject to this policy?	

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?		
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.		
2.b. - Payment Standards – Fair Market Rents (HCV)		Input options and instructions
Please explain the payment standards by FMR.		
2.c. - Rent Reasonableness – Process (HCV)		
Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method.		
2.d. - Rent Reasonableness – Third-Party Requirement (HCV)		Input options and instructions
Please explain or upload a description of the quality assurance method.		[Upload file] options
Please explain or upload a description of the rent reasonableness determination method.		[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?		<input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 or more
Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.		
3.c., 3.d. - Self-Certification of Assets (PH & HCV)		Input options and instructions
Please state the dollar threshold for the self-certification of assets.		\$_____

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?	
How many payments were issued under this policy in the most recently completed PHA fiscal year?	<input type="text"/> [number of payments]
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	\$ <input type="text"/>
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?	<input type="text"/> [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?	
How many penalty payments were charged under this policy in the most recently completed PHA fiscal year?	<input type="text"/> [number]
5.c. - Third-Party Requirement (HCV)	Input options and instructions
Please explain or upload a description of the quality assurance method.	[Upload file] options
5.d. - Alternative Inspection Schedule (HCV)	[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?	<input type="text"/> [number of months]
How is the tenant contribution established for this program?	
How many households do you expect to serve in this program in the Fiscal Year?	<input type="text"/> [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?	
Please list any partner organizations and briefly note the services that each provides.	

C.7	Term-Limited Assistance
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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
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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)
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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.]
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9.c. - Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement (HCV)	[No custom questions for this activity.]
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9.d. - Alternative PBV Selection Process (HCV)	[No custom questions for this activity.]
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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.]
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9.g. - Increase PBV Rent to Owner (HCV)	[No custom questions for this activity.]
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9.h. - Limit Portability for PBV Units (HCV)	[No custom questions for this activity.]
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C.10	Family Self-Sufficiency Program with MTW Flexibility (Traditional)
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10.a. - Waive Operating a Required FSS Program (PH & HCV)	[No custom questions for this activity.]
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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?		
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.
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?		
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.
What counts as "work" under this the work requirement MTW activity?		
How will the MTW agency monitor compliance with the work requirement MTW activity?		
What supportive services are offered to support households to comply with the work requirement?		
How does the agency address noncompliance with the work requirement policy?		
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
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14.a. - Waive Initial HQS Inspection Requirement (HCV)	[No custom questions for this activity.]
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14.b. - Allow Income Calculations from Partner Agencies (PH and HCV)	[No custom questions for this activity.]
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14.c. - Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH & HCV)	[No custom questions for this activity.]
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C.15	Acquisition without Prior HUD Approval
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15. - Acquisition without Prior HUD Approval (PH)	[No custom questions for this activity.]
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C.16	Deconcentration of Poverty in Public Housing Policy
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16. - Deconcentration of Poverty in Public Housing (PH)	[No custom questions for this activity.]
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C.17	Local, Non-Traditional (LNT) Activities
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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?

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

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]	[add name of development and address]	[add name of development and address]	[add name of development and address]
MTW Role: Acquisition, Rehabilitation, New Construction?				
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
• 80% of AMI				
• 60% of AMI				
• 30% of AMI				
• Other				

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

Question	[add name of development and address]	[add name of development and address]	[add name of development and address]	[add name of development and address]
MTW Role: Acquisition, Rehabilitation, New Construction?				
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
• 80% of AMI				
• 60% of AMI				
• 30% of AMI				
• Other				

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

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

Question	[add name of development and address]	[add name of development and address]	[add name of development and address]	[add name of development and address]
MTW Role: Acquisition, Rehabilitation, New Construction?				
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
• 80% of AMI				
• 60% of AMI				
• 30% of AMI				
• Other				

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

Question	[add name of development and address]	[add name of development and address]	[add name of development and address]	[add name of development and address]
MTW Role: Acquisition, Rehabilitation, New Construction?				
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
• 80% of AMI				
• 60% of AMI				
• 30% of AMI				
• Other				

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

	<p>received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p><input type="checkbox"/> No [If no, skip to E.2]</p> <p><input type="checkbox"/> Yes [If yes, please provide a title and upload required information in a-h above for each Agency-Specific Waiver request]</p>
E.2	<p>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.</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> No [If no, question set concludes]</p>

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	<p>75% Very Low Income – Local, Non-Traditional.</p> <p>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.</p>

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

G.3	Substantially the Same (STS) – Local, Non-Traditional.
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Questions	Input options and instructions
Please provide the total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	___ # 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.
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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

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 ([10/01/2025](#)), 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.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and 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 signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies for the MTW PHA's jurisdiction and a description of the way the MTW Supplement is consistent with the applicable Consolidated Plan (24 CFR 91.2, 91.225, 91.325, and 91.425).
- (7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. 24 CFR 5.151. The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.
- (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 the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not base a determination of eligibility for housing based on actual or perceived sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity), 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' for people with physical disabilities.
- (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 and should be made available electronically, upon request.

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

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

TABLE 1. GUIDE

- Core questions - An "X" in this column means that these are the set of core questions that are relevant for every waiver/activity.
- Custom questions - An "X" in this column means that these are questions that are specific to a particular activity. Not every activity will have custom questions.
- Safe Harbor - An "X" in this column means that the activity as described in Appendix 1 of the 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 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 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
s. Elimination of Deduction(s) (HCV)	X	X		X	X
t. Standard Deductions (PH)	X	X			
u. Standard Deductions (HCV)	X	X			
v. Alternative Income Inclusions/Exclusions (PH)	X	X			
w. Alternative Income Inclusions/Exclusions (HCV)	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			
d. Rent Reasonableness – Third-Party Requirement (HCV)	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			
d. Alternative Inspection Schedule (HCV)	X		X		
6. Short-Term Assistance					
a. Short-Term Assistance (PH)	X	X	X		
b. Short-Term Assistance (HCV)	X	X	X		
7. Term-Limited Assistance					
Term-Limited Assistance (PH)	X	X	X	X	X
Term-Limited Assistance	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				
d. Alternative PBV Selection Process (HCV)	X				
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	X	X			
f. Increase PBV HAP Contract Length (HCV)	X		X		
g. Increase PBV Rent to Owner (HCV)	X				
h. Limit Portability for PBV Units (HCV)	X				
10. Family Self-Sufficiency Program with MTW Flexibility					
a. Waive Operating a Required FSS Program (PH & HCV)	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		
c. Alternative Family Selection Procedures (PH & HCV)	X	X	X		
d. Modify or Eliminate the Contract of Participation (PH & HCV)	X	X	X		
e. Policies for Addressing Increases in Family Income (PH & HCV)	X	X	X		
11. MTW Self-Sufficiency Program					
a. Alternative Family Selection Procedures (PH & HCV)	X	X	X		
b. Policies for Addressing Increases in Family Income (PH & HCV)	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		
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				
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		

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

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

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

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

A.1 Include the full **PHA Name, PHA Code, PHA Fiscal Year Beginning (MM/DD/YYYY), MTW Cohort Number, and MTW Supplement Submission Type.**

B. Narrative. All MTW agencies must complete this section.

B.1 MTW Supplement Narrative.

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

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

C. MTW Waivers.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

D. Safe Harbor Waivers.

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

E. Agency-Specific Waivers.

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

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

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

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

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

F. Public Housing Operating Subsidy Grant Reporting

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

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

G. MTW Statutory Requirements.

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

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

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

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

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

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

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

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

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

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

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

H. Public Comments.

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

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

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

I. Evaluations

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

J. MTW Certifications of Compliance.

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

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

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

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

B.1 Narrative

The main goal is to decentralize the concentration of assisted families in low-income areas and gain new landlords in opportunity areas. An aggressive outreach to landlords in opportunity areas combined with the landlord incentives will increase housing choices for families giving them incentives to live in opportunity areas with better schools. The cost effectiveness will balance out as those in the work force retain their employment and thus result in lower Housing Assistance Payments in addition to funding received from Lake County, IL.

Our short-term goal is to decrease the number of voucher holders living in low-income areas. Ongoing efforts to increase landlord participation in opportunity areas will increase the supply of rental units for the families to choose from. They have a better chance to realize Self-Sufficiency with seeking employment, retaining employment, or gain better employment. More housing choices will be available when the new landlords in opportunity areas agree to participate in the HCV program. LCHA will try to bridge the Landlord-Tenant gap the families have had to overcome on their own.

The Landlord Liaison will work together with the Housing Quality Specialists to educate and encourage landlord participation. The Family Self-Sufficiency staff will promote participation in the FSS program, and the Housing Counseling staff will assist families in areas where their needs require credit counseling or managing finances. As new landlords and families renting in opportunities area are tracked, additional support will be given and encouraged frequently.

LCHA will continuously hold landlord information meetings to communicate the incentives being offered. Local realtors and leasing agents will be contacted in hopes of educating them on the benefits to the Housing Choice Voucher program. An additional goal is to have many rentals to choose from in the opportunity areas.

The change in opportunity areas where the property is located in a census tract that is considered low poverty defined by HUD's deconcentrating initiatives has increased participation in the program.

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.

New landlords to the program will be given one month's rent as an incentive to lease to a HCV family. One on one contact with staff will help maintain relationships during the leasing process.

Landlords in opportunity areas will be given one month's rent as a vacancy payment in between tenants if they rent to another HCV family.

In an effort to increase availability of units to our families, LCHA plans to increase the number of Project Base units. The flexibility of the MTW program allows the Housing Authority to Project Base up to the lower of 50% of the authorized units or up to 50% of the budget authority.

In keeping with HUD's guidelines, LCHA will strive to Project Base units in census tracts with a poverty rate of 20 percent or less, favoring projects that provide supportive housing to persons with disabilities or to the elderly.

LCHA will also try and implement new Project Base developments using an Alternative Selection Process. Many of the efforts are duplicated when developers are committing to leasing of low income families. Alternative competitive processing of 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.

C – Text box regarding location

The Housing Choice Voucher 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.

C.4 – Text box Landlord Leasing Incentives

The Housing Choice Voucher 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.

H.1 – attach Public Hearing comments and/or RAB meeting



Move To Work

Administrative Plan

October 1, 2025

Chapter 1

Overview of the Plan

The Lake County Housing Authority (LCHA) was granted participation in the Move to Work (MTW) Expansion - Landlord Incentives Cohort on August 24, 2022.

The three statutory objectives of the MTW Demonstration Program are:

1. Increase housing choices for low-income families.
2. Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
3. Reduce costs and achieve greater cost effectiveness in federal expenditures.

Move To Work agencies have directly influenced national policy for 25 years, allowing Housing Authorities the flexibility to leverage resources to create customized housing solutions specific to the challenges of the Lake County community.

LCHA is a leader in affordable housing by taking an innovative and dynamic approach to developing sustainable communities throughout Lake County. LCHA continues to cultivate its partnership with local, state, and federal organizations to provide supportive services to the families and neighborhoods it serves.

This program provides LCHA with the flexibility to meet our local specific needs and enables the creation of innovative policies that promote self-sufficiency, reduce program cost, and increase options for participants in the program.

The new MTW Cohort will be a blueprint and exam incentives for property owners who rent to individuals and families with a Housing Choice Voucher (HCV).

The goal is to increase the choice to live in areas with more employment opportunities for our family's encouraging self-sufficiency, better schools, lower crime rates, and more desirable housing.

This Landlord Incentive Cohort continues the MTW's tradition of policy innovation benefiting residents who receive federal assistance, which helps promote the Housing Choice Voucher Program.

Chapter 2

Fair Housing

LCHA 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, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990. LCHA will affirmatively further fair housing by:

- examining their programs or proposed programs,
- identify any impediments to fair housing choice within those programs,
- address those impediments in a reasonable fashion in view of the resources available,
- work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require LCHA's involvement,
- maintain records reflecting these analyses and actions.

Chapter 3

Landlord Incentives

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 opportunities 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.

Vacancy Loss (HCV – Tenant Based Assistance)

One month's rent in between HCV families in opportunity areas

Landlords in opportunity areas will be offered one month's rent by continuing to rent to another HCV family. The vacancy loss payment will be paid after the executed contract of the continued leasing of an HCV family.

The maximum amount of time in between HCV family leases will be 120 days.

New Landlord Incentive (HCV – Tenant Based Assistance)

One month's rent to a Landlord in an opportunity area who has never participated or has not had a HCV tenant within the last 12 months in the unit.

New landlords or those who have not had a HCV tenant in the past 12 months will be offered one month's rent for participating in the HCV program. The incentive payment will be paid after the executed contract.

Increase PBV Program Cap

Increase PBV Program Cap (HCV) to 50% of the lower of either the total authorized units or annual budget authority.

In an effort to increase availability of units to our families, LCHA plans to increase the number of Project Base units. The flexibility of the MTW program allows the Housing Authority to Project Base up to the lower of 50% of the authorized units or up to 50% of the budget authority. In keeping with HUD's guidelines, LCHA will strive to Project Base units in census tracts with a poverty rate of 20 percent or less, favoring projects that provide supportive housing to persons with disabilities or to the elderly.

Alternative PBV Selection Process

Alternative competitive processing of 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 will also try and implement new Project Base developments using an Alternative Selection Process. Many of the efforts are duplicated when developers are committing to leasing of low-income families.

Chapter 4

General Operating Information

LCHA will try to bridge the Landlord-Tenant gap the families have had to overcome on their own. LCHA will continuously hold landlord information meetings, both in person and online. Local realtors and leasing agents will be contacted in hopes of educating them on the benefits to the Housing Choice Voucher program. An additional goal is to have many rentals to choose from in the opportunity areas.

All staff will work diligently in landlord outreach in opportunity areas. Housing Quality Standards Specialists will adhere to a streamlined process from landlord inquiries to the Request for Tenancy Approvals to move in inspection and contract execution.

The Family Self-Sufficiency staff will encourage participation in the FSS program to all families including those gaining residence in the landlord incentive program. Individualized consistent contact with the families will help ensure any issues are addressed to help them succeed.

The Housing Counseling staff will continue to assist all families in areas where their needs require credit counseling or managing finances. As new landlords and families renting in opportunities area are tracked, additional support will be given and encouraged frequently.

Chapter 5

Updating and Revising the Plan

There are many MTW activities, subject to limitations as outlined in the MTW Operations Notice, that an MTW agency may implement. The PHA must annually submit requests to change the plan to HUD and 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 about the MTW activities they are proposing to implement, request waivers associated MTW activities and provide specific information about each MTW activity they are proposing to implement.

LCHA is participating in the MTW program to encourage landlords to rent to voucher families and looks forward to future opportunities to strengthen and develop successful program participation.