



Orlando Housing Authority

Moving to Work Plan

for the year ending March 31, 2011

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I. INTRODUCTION

B. Overview of Goals and Objectives

The material in this document constitutes the Moving to Work (MTW) Plan for the first year of operation of the Orlando Housing Authority (OHA)'s MTW Demonstration Program, through March 31, 2011. This section outlines OHA's MTW goals and objectives, including proposed activities.

In keeping with OHA's decision to strive for dramatic progress toward achieving all three of the MTW statutory purposes, OHA's MTW goals and objectives relate to all three of these purposes. The key MTW goals and objectives related to each statutory purpose are listed below. Some of the MTW activities, particularly with respect to revisions in the rent system, relate to more than one statutory purpose. Initiatives to be carried out as a result of MTW single-fund flexibility also are listed.

OHA expects the specific activities and initiatives to evolve considerably. Thus, there are activities and initiatives that OHA hopes to undertake and may begin to develop during the year that are not included in the chart below because OHA does not project the ability to begin implementation. Such activities or initiatives are discussed in Section IV, Long-Term MTW Plan. In addition, while some MTW activities will be brought to full scale during the initial year, OHA proposes to phase in a basic change to the rent system so that OHA can examine the impact carefully and make any necessary adjustments. The initiatives of the proposed self-sufficiency resource center will grow and be shaped by experience over the first several years. Other activities or initiatives will take time to reach their full potential.

Statutory Purpose: Increase Cost-Effectiveness

1. Streamline and simplify rent structure and recertification process
2. Consolidate recertification and inspection processes
3. Review other OHA processes for potential streamlining

Statutory Purpose: Increase Self-Sufficiency

1. Remove or reduce rent disincentives to continued employment, income reporting and family reunification during occupancy of assisted housing
2. Improve recipient access to jobs and supportive services, through a comprehensive 1-stop self-sufficiency resource center and specific initiatives to dramatically bolster job readiness, access, education/training and employment opportunities (use of single-fund flexibility)
 - Improve transportation to centers of employment and during off-hours
 - Increase child care opportunities, particularly during non-traditional hours

Statutory Purpose: Increase Housing Choices for Low-Income families

1. Use all available resources (subsidies, OHA-owned properties, leveraging) to provide increased low-income housing choices.
2. Provide additional counseling and interim assistance to low-income homeowners facing foreclosure
3. Partner with the Central Florida Commission on Homelessness to provide homeless/transitional housing
4. Provide additional options for seniors needing assisted living services (activity for second MTW year)
5. Take advantage of acquisition and development opportunities resulting from distressed local real estate market (activity for second MTW year)

All Statutory Purposes

1. Take every reasonable step to complete the greening of the Orlando Housing Authority, in partnership as appropriate with Enterprise Community Partners (use of single-fund flexibility).
2. Partner with the University of Central Florida for annual local evaluation and recommendations, to further assure timely modification as needed of MTW initiatives (use of single-fund flexibility).

The chart below provides more detail regarding MTW initiatives consistent with these general goals that OHA expects to commence in the first year.

<u>GOAL</u>	<u>OBJECTIVE</u>	<u>ACTIVITY</u>	<u>STATUTORY PURPOSE</u> A. COST-EFFECTIVENESS B. SELF-SUFFICIENCY C. HOUSING CHOICE
1. Phase in implementation of a self-sufficiency rent floor for households with non-elderly, non-disabled adults, with hardship exceptions linked to self-sufficiency activities	<p>Reduce staff time needed to calculate rents and conduct recertifications</p> <p>Eliminate or reduce disincentives to working and to reporting income</p> <p>Support full OHA participation of all household members and family reunification</p>	<p>Initial year: implement for new family public housing admissions and at two sites, Ivey Lane and Citrus Square</p> <p>Phase in over three years for public housing and in the fourth year for the voucher program, with adjustments as warranted by experience and analysis</p> <p>Required participation of households subject to the rent floor in self-sufficiency activities</p> <p>Include hardship exemption process sensitive to economic conditions</p>	A, B
2. Streamline the recertification process in the public housing and voucher programs	Reduce staff time needed to conduct recertifications	Recertify elderly/disabled every three years, with annual adjustments for fixed-income program cost of living increases	A
3. Streamline the rent calculation process in the public housing and voucher programs	Reduce staff time needed to calculate rents	<p>Disregard first \$25,000 in assets</p> <p>Eliminate written third-party verifications except on a limited audit basis</p>	
4. Consolidate inspection and recertification	Reduce staff time resulting from different	Use Housing Quality Standards as housing	A

<u>GOAL</u>	<u>OBJECTIVE</u>	<u>ACTIVITY</u>	<u>STATUTORY PURPOSE</u> A. COST-EFFECTIVENESS B. SELF-SUFFICIENCY C. HOUSING CHOICE
requirements	inspection requirements and recertification processes	<p>condition evaluation standard for both the public housing and the voucher programs, without losing eligibility for Capital Fund bonus for PHAS high performers</p> <p>Use inspection and recertification schedules for both programs based on geographic location, rather than date of initial receipt of assistance</p>	
5. Provide interim assistance and counseling to households threatened with foreclosure	Prevent foreclosures	<p>In coordination with the City of Orlando's foreclosure prevention efforts and other partners, provide approximately 50 interim vouchers, generally for up to six months, to newly unemployed or other homeowners facing temporary hardship and threatened with foreclosure. Initial year expected volume is a substantially lower number.</p> <p>Expand successful OHA counseling programs to homeowners who will receive interim voucher assistance</p>	B, C
6. Partner with Central Florida Commission on Homelessness to provide homeless/transitional housing facility	Provide housing and supportive services as transitional assistance for homeless households	Use public housing ACC authority to provide operating subsidy for approximately 50 1-bedroom units at West Oaks development; Commission to provide counseling and supportive	B, C

<u>GOAL</u>	<u>OBJECTIVE</u>	<u>ACTIVITY</u>	<u>STATUTORY PURPOSE</u> A. COST-EFFECTIVENESS B. SELF-SUFFICIENCY C. HOUSING CHOICE
		services. Initial year expectation is a substantially lower number.	
7. Use project-based vouchers and other resources to develop City-donated property for low-income elderly housing	Provide new, well-located additional housing for elderly; provide relocation resource to an improved housing location	Commit approximately 45 project-based vouchers and leverage low-income housing tax credits or other resources to produce approximately a 95-unit development with net additional new units	C
8. Provide comprehensive OHA 1-stop self-sufficiency resource center (use of single-fund flexibility)	<p>Provide for more focused and greatly expanded self-sufficiency support</p> <p>Help residents prepare and be able to compete for employment</p> <p>Link residents to jobs through expanded information and referral and casework efforts</p> <p>Help residents access employment, by making child care available during non-traditional hours and by facilitating transportation</p> <p>Provide space and assistance for business development training (longer-term)</p>	<p>Refurbish building as needed and operate the center</p> <p>Hire a recruiter, assisted by counselors, to assist with overcoming employment barriers and job placement and facilitating use of local services</p> <p>Offer job-readiness services including linkages with basic education resources</p> <p>Complete specific arrangements with childcare providers</p> <p>Develop partnership with Central Florida Regional Transportation Authority (LYNX) to provide off-hour transportation to major job sites, particularly where not centrally located</p> <p>Improve coordination with and among service</p>	B

<u>GOAL</u>	<u>OBJECTIVE</u>	<u>ACTIVITY</u>	<u>STATUTORY PURPOSE</u> A. COST-EFFECTIVENESS B. SELF-SUFFICIENCY C. HOUSING CHOICE	
		<p>providers</p> <p>Bring in additional services from current partners</p> <p>Develop specific linkages and programs with large employers</p> <p>Require families subject to rent floor to participate in self-sufficiency activities</p>		
9.	Take every reasonable step to complete the greening of OHA (use of single-fund flexibility)	Reduce utility bills for OHA and residents; produce healthier living environment	<p>Work with Enterprise Community Partners to identify remaining steps</p> <p>Address remaining mildew issues</p> <p>Conduct resident training and other activities to be identified</p>	A, B, C
10	Provide for effective evaluation of MTW initiatives (use of single-fund flexibility)	Assure timely improvements in MTW activities	<p>Receive annual evaluation and recommendations from University of Central Florida</p> <p>Promptly implement recommendations as appropriate</p>	A, B, C

II. GENERAL HOUSING AUTHORITY OPERATING INFORMATION

A Housing Stock Information

Summary

The following chart summarizes the number of public housing units available as of the beginning of the MTW plan year, as well as the number of units to be added and removed during the year. The chart also summarizes the number of MTW and non-MTW Housing Choice Vouchers authorized as of the beginning of the MTW plan year, as well as the number of MTW Housing Choice Vouchers to be project-based during such year. Finally, the chart summarizes the other housing units available at the beginning of the year, as well as the number of units to be added and removed during the year. As the notes below explain, several initiatives will be in progress during the year that will lead to changes in the OHA housing stock in later years. The statistics in this section have not been updated from OHA's MTW program application of December 15, 2009.

OHA HOUSING STOCK SUMMARY					
Public Housing	Number of Units	Housing Choice Vouchers	Number of Vouchers	Other Housing	Number of Units
Total Public Housing Units Available Beginning of Year	1495	MTW Tenant-Based Vouchers Authorized Beginning of Year	2518	Total Other Units Available Beginning of Year	456
Units to be Added During the Year	50; see "Addition of Units", below	MTW Project-Based Vouchers Authorized Beginning of Year	0	Units to be Added During the Year	See "Planned Significant Capital Expenditures" and "Addition of Units", below
Units to be Removed During the Year	See "Removal of Units" below.	MTW Housing Choice Vouchers to be Project Based During the Year	0	Units to be Removed During the Year	See "Removal of Units" below
		TOTAL MTW VOUCHERS	2518		
		Non MTW Housing Choice Vouchers Authorized (includes 100 single-room occupancy vouchers for which OHA is contract administrator)	375		
TOTAL UNITS END OF YEAR	1565	TOTAL VOUCHERS	2893		456

General Characteristics of OHA Housing Stock

The following chart provides a description of the total number of units, by bedroom size, available in OHA’s public housing and voucher programs, as well as other housing offered by OHA.

PUBLIC HOUSING STOCK CHARACTERISTICS							
PUBLIC HOUSING COMMUNITY	0 BEDROOM	1 BEDROOM	2 BEDROOM	3 BEDROOM	4 BEDROOM	5+ BEDROOM	TOTAL
The Landings at Carver Park			20	10			30
Griffin Park Apartments	9	53	58	48	3		171
Reeves Terrace Apartments		23	78	60	10		171
Lake Mann Homes		19	89	80	18	1	207
Murchison Terrace		40	83	49	14	2	188
Ivey Lane Homes		17	41	61	36	26	181
Citrus Square Apartments		9	56	18	4		87
Omega Apartments			34	33	6		73
Marden Meadows Apartments				40	5		45
The Villas at Hampton Park [ELDERLY]		48					48
The Villas at Carver Park [ELDERLY]		64					64
Johnson Manor [ELDERLY]		40					40
Meadow Lake Apartments [ELDERLY / DISABLED]		87					87
Lorna Doone Apartments [ELDERLY]	59	44					103
TOTAL	68	444	459	399	96	29	1495

	PUBLIC HOUSING		SECTION 8		OTHER HOUSING	
BEDROOM SIZE	NUMBER OF UNITS	PERCENT	NUMBER OF UNITS	PERCENT	NUMBER OF UNITS	PERCENT
0	68	4.55%	136	5.28%		
1	444	29.70%	1172	45.46%	331	72.59%
2	459	30.70%	370	14.35%	125	27.41%
3	399	26.69%	745	28.90%		
4	96	6.42%	144	5.59%		
5	27	1.81%	9	0.35%		
6	2	0.13%	2	0.4%		
Totals	1495	100%	2578	100%	456	100%

The public housing numbers do not include 16 units used for non-dwelling purposes. The Section 8 numbers are the number of units leased in all voucher programs.

Planned Significant Capital Expenditures

OHA owns and manages the 75-unit Jackson Court / Division Oaks community. The City of Orlando, the owner of the underlying land, proposes to utilize the land for commercial development and to donate a replacement site in a desirable downtown residential location that can accommodate approximately 95 units (the Development). OHA expects to commit approximately 45 project-based vouchers and may seek low-income housing tax credits (Tax Credits). Total capital costs would be in the \$15-20 million range, although only preliminary costs are expected to be incurred in the coming year, This activity is described further below as MTW Activity 7.

Addition of Units

OHA intends to convert approximately 50 one-bedroom units in its West Oaks development, over time, to public housing, some or all of which to be used as transitional housing for formerly homeless individuals. This activity is described further below as MTW Activity 6.

Removal of Units

OHA has applied for a HOPE VI grant for its Lake Mann Homes community. If OHA is successful, OHA intends to demolish the 207 units at Lake Mann and replace the units with 112 units of public housing and 113 units of Tax Credit housing.

Non-MTW Housing Choice Voucher Units

OHA has 375 vouchers committed for special programs that would not become MTW vouchers. This number includes 175 HUD-Veterans Affairs Supportive Housing (VASH) vouchers, 100 vouchers for non-elderly disabled households, and 100 single-room occupancy vouchers for which OHA is the contract administrator.

Project-Based Voucher Units

OHA intends to project base approximately 45 vouchers at the Development. The Development would be new construction and would not be ready for occupancy in the coming year. Thus, the 45 project-based vouchers are not shown on the charts for the year.

B. Leasing Information, Planned

Summary

The following chart reflects the anticipated total number of MTW Public Housing, non-MTW Public Housing, MTW Housing Choice Voucher and non-MTW Housing Choice Voucher units to be leased during the MTW plan year:

OHA LEASING INFORMATION			
MTW Public Housing		Non-MTW Public Housing	
Total Units	1495	Total Units	0
Total Units Leased	1495	Total Units Leased	N/A
Percent of Units Leased	100	Percent of Units Leased	N/A

MTW Housing Choice Vouchers		Non-MTW Housing Choice Vouchers	
Total Tenant Based	2518	Total Vouchers	375
Total Tenant Based Leased	2518 (use all available budget authority)	Total Vouchers Leased	375; see notes below
Total Project Based	0	Percent of Vouchers Leased	100; see notes below
Total Vouchers Held for MTW funding	100*		
Percent of Vouchers Leased	100*		

Leasing Issues

OHA does not anticipate any leasing issues. In 2009, however, OHA's use of all of its budget authority did not allow it to use its authorized number of vouchers. This occurred, in part, because OHA has approved 275 *Reasonable Accommodation* requests for over ten percent of voucher households, resulting in additional costs of approximately \$765,000 on annual basis.

With respect to the non-MTW vouchers, the VASH and non-elderly disabled awards are fairly new and are still in initial lease-up. Thus, these programs are not fully leased now (160 non-MTW units are leased as of ____), but full lease-up is anticipated by the end of the MTW Plan year. OHA cannot fully control the pace of lease-up for the VASH vouchers, which are administered in cooperation with the Department of Veterans Affairs.

The asterisks are included on the chart to highlight that a maximum of 100 units' worth of voucher funding would be used for other MTW activities. Such units are generally treated as leased for MTW purposes and thus are listed here as leased. While at least 45 project-based voucher units would be in the development pipeline for the Development, OHA will not have to hold back vouchers for this purpose during the coming year.

C. Waiting List Information

OHA does not anticipate any changes in the structure, or the opening or closing, of its waiting lists. Because OHA plans to use the funding from up to 100 vouchers to support critical MTW activities, the wait time for vouchers could lengthen to that extent. In addition, OHA's proposal to dedicate as many as 50 vouchers to its foreclosure prevention initiative (MTW Activity 5) will affect waiting list households in the same manner. Some individuals on the waiting lists may be served by the addition of 50 public housing units for use as transitional housing for the homeless or by other potential additional low-income housing referenced in the MTW Plan. Open waiting lists may lengthen if the economy continues to be weak.

D. Additional Related Information

Demographic Information

The following chart summarizes the demographic information of families currently assisted by OHA.

	Public Housing		Housing Choice Vouchers	
Total Number of Households	1463	100%	2578	100%
Distribution by Income Level				
Extremely Low Income	798	54.55%	1593	61.79%
Very Low Income	520	35.54%	789	30.61%
Low Income	134	9.16%	182	7.06%
Above Low Income	11	0.75%	14	0.54%
Distribution by Bedroom Size				
0 Bedrooms	66	4.51%	136	5.28%
1 Bedroom	439	30.01%	1172	45.46%
2 Bedrooms	447	30.55%	370	14.35%
3 Bedrooms	386	26.38%	745	28.90%
4 Bedrooms	96	6.56%	144	5.59%
5 Bedrooms	27	1.85%	9	0.35%

	Public Housing		Housing Choice Vouchers	
6+ Bedrooms	2	0.14%	2	0.08%
Distribution by Family Type				
Elderly Disabled	280	19.14%	362	14.04%
Elderly Non-Disabled	122	8.34%	79	3.06%
Non-Elderly Disabled	483	33.01%	1004	38.94%
Non-Elderly Non-Disabled	578	39.51%	1133	43.95%
Distribution by Race of Head of Household				
White	401	27.41%	1196	46.39%
Black/African American	973	66.51%	1287	49.92%
Asian	17	1.16%	14	0.54%
Native Hawaiian/Other Pacific Is.	12	0.82%	4	0.16%
Other/Unknown	60	4.10%	77	2.99%
Distribution by Ethnicity of Head of Household				
Hispanic or Latino	458	31.31%	1169	45.35%
Not Hispanic or Latino	1005	68.69%	1409	54.65%

OHA does not expect the demographics of those to be served under the proposed MTW Plan to be appreciably different from those currently served by the public housing and voucher programs. The proposed MTW Activities to add 50 units of public housing for transitional housing for homeless individuals, to use as many as 50 vouchers for interim assistance to households faced with foreclosure and to add approximately 45 project-based voucher units for the elderly at the Development will serve those with particular demographics (lower incomes for the homeless, and perhaps somewhat higher incomes for those facing foreclosure and those in non-project-based voucher units at the Development, than households OHA typically serves), but as currently proposed those initiatives are not large enough to modify the overall demographics substantially. OHA's self-sufficiency-related initiatives ultimately should allow OHA assistance recipients to increase their incomes, thus changing the demographics to that extent.

Income Targeting

OHA's current plans are to maintain the statutory income targeting for the public housing and voucher programs that otherwise would be required of non-MTW PHAs. Given the current economic conditions, OHA does not intend at this point to utilize the flexibility provided to MTW PHAs to have less stringent income targeting for new admissions.

III. NON-MTW RELATED HOUSING AUTHORITY INFORMATION

A. Sources and Uses

A list of planned sources of other (non-MTW) HUD funds (excluding HOPE VI) follows. The uses of the funds are evident based upon the sources. Current-year funding is stated, because OHA does not have different estimates for the coming year at this point. Some of the sources listed, notably the Capital Fund formula American Reinvestment and Recovery Act (ARRA) funding, may not be recurring awards for 2010.

Vouchers for non-elderly persons with disabilities, \$740,124

HUD-VASH vouchers, \$1,065,299

Vouchers for Single-Room Occupancy, \$391,212 (OHA is contract administrator)

FSS Coordinator, \$99,974

Resident Opportunities and Supportive Services (ROSS), \$107,108

Capital Fund formula ARRA funding, \$3,582,587

Operation of 456 low-income housing units other than public housing, \$3,582,387 (gross potential rent)

B. Description of Non-MTW Activities

OHA operates the initiatives represented by the funding sources listed above. The 456 non-public housing low-income housing units are all rental housing, are described further below and consist of the 280-unit West Oaks development, the 101-unit Antioch Manor Section 202/8 development for the elderly, and the 75-unit Jackson Square/Division Oaks development. OHA also continues activities with respect to the Carver Park HOPE VI and has a pending \$22 million application for HOPE VI for its Lake Mann development.

IV. LONG-TERM MTW PLAN

A. Long-term Vision

OHA's long-term vision for the direction of the MTW program is to achieve the maximum possible increased cost-effectiveness, resident self-sufficiency, and housing choice, given the resources available to it.

With respect to cost-effectiveness, OHA's vision is that the valuable federal resources it receives are put to the best possible use - providing the most and highest-quality affordable housing and related services to the Orlando community and leveraging additional resources that can help the community.

With respect to self-sufficiency, OHA's vision is that its rent structure provide incentives for its families to sustain and increase earnings and employment while retaining affordability, and that OHA comprehensively support self-sufficiency through a one-stop resource center that provides and leverages resources to link its residents to services throughout the Orlando community, helps residents prepare for and find jobs, facilitates convenient transportation to job centers during relevant hours, and provide off-hours childcare. Ultimately, all assisted adults who can work should receive the necessary assistance to do so.

With respect to housing choice, OHA's vision is that first, OHA take advantage of every potential resource to provide additional access to low-income housing, and second, that OHA do its part to address particular community needs such as foreclosure prevention and homelessness, in addition to fulfilling its historic role as outstanding provider of public housing and vouchers for low-income households.

With respect to all three statutory goals, OHA's vision is that it take every reasonable step to complete the greening of the Authority to provide for reduced utility bills and healthier and higher-quality housing, and that the evaluation partnership with the University of Central Florida lead to timely improvement in MTW throughout the life of the demonstration.

B. Strategies

OHA's strategy for achieving its vision considers both local needs and opportunities and potential solutions with broad applicability.

Cost-Effectiveness Strategies

The following strategies will contribute to increased cost-effectiveness:

- Implement a self-sufficiency rent floor for households with non-elderly, non-disabled adults that is more cost-effective than the current system
- Streamline the recertification processes and rent calculation by recertifying households with no non-elderly, non-disabled adults every three years, disregarding the first \$25,000 of assets for rent calculation purposes and eliminating written third-party verifications except on a limited audit basis

- Consolidate public housing and voucher processes where possible to promote efficiency
- During future MTW years, assess and implement as merited additional efficiency steps, such as streamlining of other processes regarding procurement, asset management, and utility billing

Self-Sufficiency Strategies

The following strategies will contribute to increased self sufficiency:

- Implement a self-sufficiency rent floor that removes or reduces work disincentives, completed with required self-sufficiency activities for households subject to the rent floor
- Provide a hardship exception mechanism that is sensitive to economic conditions, but also requires hardship households to participate in self-sufficiency activities.
- Develop a comprehensive one-stop OHA self-sufficiency resource center to improve linkages with basic education, work readiness, training and employment opportunities; provide an off-hours day-care facility, enhance and improve coordination and development of existing partnerships for activities such as work readiness training and ultimately, resident business development; build partnerships with major employers; and partner with the local public transportation system to support transportation to employment centers out of the downtown area and at off-hours.

Housing Choice Strategies

The following strategies will contribute to increased housing choice:

- Augment the City of Orlando's Foreclosure Prevention Program, by providing interim voucher assistance and expanding a successful foreclosure prevention counseling program beyond OHA's public housing homeownership clients.
- Work with the Central Florida Commission on Homelessness and provide public housing operating subsidy (Annual Contributions Contract (ACC)) resources, so that OHA can couple its housing assistance with supportive service and other assistance to significantly expand Orlando's transitional housing efforts for homeless individuals
- Provide a mechanism for elderly residents to obtain needed assisted living services with vouchers where possible, by allowing more flexibility in the rent rules so that residents can pay for services that for them are basic living expenses (second MTW year)
- Take advantage of the potential to use ACC resources, project-based vouchers or other resources to support strategic additions to the low-income stock (second MTW year)

All Statutory Purposes

The following strategies will contribute to achievement of all three statutory purposes:

- Undertake additional greening efforts to reduce utility bills and produce healthier housing
- Sponsor a local independent evaluation to encourage timely improvements in MTW activities.

These strategies will evolve over the 10-year term of the demonstration. Rent and self-sufficiency strategies will adapt to experience and changes in the economy, and housing choice efforts will adapt to funding and economic opportunities. All efforts may be expanded as OHA makes further determinations of its capacity and continues to review successful approaches elsewhere, laws change and new opportunities present themselves. New activities, such as those that would provide further assistance for PHA's substantial disabled population, may be able to be undertaken.

More specifically, there are two additional activities that OHA currently expects to begin implementing during the second MTW year:

Activity 1: Expand assisted living options by allowing voucher-holders to pay more than 40% of their incomes

A. Description – OHA currently assists a number of frail elderly individuals who need assisted living services. OHA would give such individuals greater ability to obtain such services, by allowing them to expend more than 40% of their incomes for rent (including services) in assisted living facilities. Studies have shown that because assisted living facilities provide additional assistance such as meals, individuals can expend a much higher percentage of their incomes to pay for the assisted living package than 40%. The vouchers typically would be used in this manner in conjunction with Medicaid waivers used to pay for additional medical services; both resources, along with the tenant pay rents that would be authorized by this activity, are expected to be needed for access to assisted living and adequate services. Congress annually has authorized such an experiment in several Michigan counties for at least the past five years, but OHA is not aware that it has been tried elsewhere. OHA will prioritize assistance for individuals now living in public housing who clearly need additional assistance with daily living tasks.

B. Statutory Objective – housing choice.

C. Anticipated Impacts – To the extent vouchers can be used successfully in this manner, elderly individuals will be provided services they need. In some cases, their relocation to assisted living also will resolve difficult management problems in their former public housing developments. Concerns include the ability of individuals who need this service to afford and access assisted living facilities even with the proposed regulatory relief.

D./ E. Baseline and Benchmarks; Data Collection Metrics and Protocols; Schedule –

METRICS/PROTOCOLS	BASELINE	BENCHMARK
OHA will track the number of waivers it grants so that vouchers can be used for assisted living facilities and the number of assisted living facilities involved, and will require residents to report additional services received and satisfaction with the facilities annually	No vouchers are now used for assisted living	Serve 35 households in this manner by the fifth year of MTW

OHA also will track both the level of resident payments and its voucher costs associated with this activity.

Schedule - OHA will take preliminary steps, including consultation with the Medicaid waiver agency and outreach to individuals who may need the services and assisted living facilities, within the first nine months of the MTW Plan year and then begin implementation depending on the results of those initial efforts. The benchmark would be attained gradually over the four-year period.

F. Authorization Cited – Attachment C Authorization: Section D.1.f. (authorizes agencies to determine property eligibility for voucher use, including types of units currently prohibited by Section 8 regulations), Section D.2.a. (authorizes variations in voucher rent policies).

G. Rent Reform Initiatives –

- a. **Board Approval** – Please see Submission Item 7 of the application.
- b. **Impact Analysis** – This proposal allows tenants to pay more than 40% of their adjusted incomes for rent if they desire to do so to access assisted living facilities. Because such facilities cover other basic costs such as meals, this should not create hardships; as further assurance, OHA will approve the rents to be paid by participating households. Because tenants’ participation in the initiative will be voluntary, no hardships should occur. As to impact on protected classes, participation in the initiative will be by elderly tenants on a voluntary basis.
- c. **Annual Re-evaluation** – OHA will reevaluate this proposal on an annual basis.
- d. **Hardship** – No hardship exemption is needed, because participation in this initiative is voluntary.
- e. **Transition Period** – This initiative will be implemented once the appropriate preliminary steps, discussed above, have been completed satisfactorily.

- f. Public Hearing* – The public hearings on November 12, 2009 and December 7, 2009 covered this rent reform initiative.

Activity 2. Take advantage of reduced real-estate prices to acquire property for additional low-income housing

A. Description – To the extent opportunities and resources become available, OHA would use public housing ACC authority, project-based vouchers or MTW seed money to finance the acquisition and operation of additional low-income housing. Where possible, other funding sources such as low-income housing tax credits would be leveraged. Any acquisition or public housing units would be within the statutory cap.

B. Statutory Objective – housing choice; cost effectiveness

C. Anticipated Impacts – The anticipated impact will depend upon resources that become available.

D./ E. Baseline and Benchmarks; Data Collection Metrics and Protocols; Schedule –

METRICS/PROTOCOLS	BASELINE	BENCHMARK
OHA will track the number of units acquired for affordable housing and the public housing, voucher or MTW resources used for such acquisitions, as well as other funds leveraged by this activity	No public housing or voucher funding has been used to purchase affordable housing	At least 15 units over three years (to be adjusted as potential resources become available)
Cost savings through streamlined processes	No cost savings	Cost savings to be set depending on the specific processes used

Schedule - OHA will plan for an initiative over a three-year MTW period that could produce at least 15 units. In the first MTW year of the activity, OHA will estimate development period time and expenses saved by use of MTW authorizations, OHA will review all potential resources and develop a plan for the maximum amount of acquisitions, taking into account other OHA resource commitments. OHA will endeavor to use all ACC authority for this purpose that is not otherwise committed.

F. Authorization Cited – Attachment C Authorizations: Section B.1.ii. (authorizes the use of MTW funds for acquisition, construction or rehabilitation of housing; also, the Attachment D authorization allowing activities to include low-income housing acquisition and/or operation apart from eligible activities under Sections 8 and 9 of the 1937 Act), Section C.13 (authorizes agencies to acquire sites for public housing without prior HUD approval and provided the agency certifies that HUD site selection requirements have been met), Section D.7. (authorizes the establishment of an Agency MTW Section 8 project-based program, including authorization to award project-based vouchers to properties owned by the PHA subject to subsidy layering requirements).

G. Rent Reform Initiatives – Not applicable.

All of these strategies will be based on a careful evaluation of all potential OHA resources, including any decision to reprogram resources from the public housing or voucher uses for which they were appropriated. OHA explicitly will undertake such reprogramming only where the results should be more effective achievement of the statutory goals with the funding in question.

C. Experiences, Activities and Accomplishments

OHA has the experience and accomplishments that demonstrate its ability to participate in the MTW Demonstration and pursue these goals vigorously. OHA has been a consistent Public Housing Assessment System (PHAS) and Section 8 Management Assessment Program (SEMAP) high performer for the past fifteen years, with current scores of 92 for PHAS and 104 for SEMAP. OHA's Hope VI performance for Hampton Park and Carver Park demonstrates its ability to work with partners, leverage funding and complete complex development programs in an excellent fashion. OHA already has strong partnerships with a number of local agencies that provide self sufficiency-related services. OHA also is a successful participant in the Capital Fund Financing Program (CFFP), with its loan closed in 2007.

OHA has been the recipient of numerous awards for excellence, including HUD awards for "Overall Management" and "Innovation", National Association of Housing and Redevelopment Officials (NAHRO) and Public Housing Authority Directors Association (PHADA) awards for resident programs, and the State of Florida Governor's Award for Energy Conservation. The agency also was recognized by the U.S. Department of Energy for "Energy Innovation".

With respect to capital and development activities, OHA has an outstanding record for successful planning, implementation, and management. In 2007, the OHA received an \$11 million loan from Fannie Mae to participate in the Capital Fund Financing Program (CFFP) to expedite improvements to public housing. Improvements are underway and will be complete in August 2010. OHA has awarded and managed contracts totaling more than \$44 million in the last 12 years, with an excellent on-time, on-budget track record.

HUD has awarded OHA two HOPE VI Revitalization Grants: Hampton Park (1997) and Carver Park (2003). In 1997, the agency received a \$6.8 million HOPE VI grant for the revitalization of the former Orange Villa Public Housing Complex (now Hampton Park). Hampton Park, a mixed-income, mixed-finance community, delivered 65 new single-family residential homes, including market rate and affordable (18) and 48 replacement public housing units for seniors, developed in the context of traditional neighborhood design principles. Hampton Park also provided 36 off-site homeownership opportunities in non-impacted areas of Orange County for low-income families through OHA's Off-site Homeownership Program. In 2003, the Downtown Orlando Partnership awarded the single-family homes development of Hampton Park the Golden Brick Award of Excellence for residential construction. Hampton Park also received national recognition for innovation and project design from NAHRO.

In 2003, OHA was awarded an \$18,084,255 HOPE VI Revitalization Grant to develop a mixed-income community on the 17-acre former site of the Carver Court public housing complex, directly west of downtown Orlando. The focal point of the Carver Park development is a stunning three-acre lake with walking path, hardscape and lush landscaping. The Carver Park

development features 203 units of housing, including rental and homeownership. The rental includes The Villas at Carver Park, a 64-unit tax credit public housing elderly-only complex, and The Landings at Carver Park, 56 units of multi-family housing, including both public housing and tax credit units. A 6,500-square-foot Neighborhood Network Center completes the development and provides space for management offices, supportive services, a computer lab and meeting space.

In recent years, OHA has sought to expand its mission as provider of affordable housing, to take on a broader role as a leader in neighborhood revitalization beyond the boundaries of existing public housing. OHA’s portfolio includes public housing, housing choice vouchers, and affordable Tax Credit, bond-financed and Project-based Section 8/ Section 202 developments. OHA has created entities to own and manage properties outside of its public housing and HCV inventory. The chart below summarizes the current portfolio:

Property	# Units	Ownership/Instrumentality	Location	Type
Jackson Court/ Division Oaks	75	OHA Properties, Inc. (City owns the land)	Downtown Orlando	Walk-up
West Oaks	280	OHA Properties, Inc.	west Orlando	Walk-up
Villas at Carver Park	64 LIHTC/ public hsg.	Villas at Carver Park, LLLP	Downtown Orlando Parramore Heritage District	Mid-rise flats
Landings at Carver Park	56 LIHTC/ incl.30 pub. hsg. units	Landings at Carver Park, LLLP	Downtown Orlando Parramore Heritage District	Townhouses and flats

In addition to the properties listed above, acquisitions in recent years include Antioch Manor, a 101-unit Senior Section 202/Project-based Section 8 apartment complex purchased using conventional financing, with the Housing Assistance Payment (HAP) contract renewed for an additional 15 years prior to purchase. Antioch Manor is a featured senior property in the Orlando market with tiled common areas, community gardens, large units, screened community space, and public transportation from the property. This year, OHA has applied for \$16.5 million under the American Recovery and Reinvestment Act, NSP2, to purchase a distressed, 188-unit affordable rental complex. Notification of the award is pending.

OHA also has an admirable record of leveraging and providing community and supportive services. It has established strong partnerships with community partners and residents, and its current programs include case management services, a homeownership program, self-sufficiency support program groups, and a financial literacy program. The staff is experienced and has longevity with OHA.

D. Potential Local and National Impact

The *local impact* of OHA’s MTW Plan will be substantial. While OHA is phasing in the Rent Floor to gain experience and be able to respond to unintended consequences, the combination of that change and the stepped-up self-sufficiency supports is fundamental for the local housing assistance system. Disincentives to work and full family unification will be eliminated or substantially reduced and education, training and work opportunities will be provided as low-

income households must continue to grapple with the difficult economy. Particular Orlando-specific needs, such as for transportation to access large employers not centrally located, will be addressed. With respect to housing choice, OHA will be able to respond to community needs and opportunities by assisting with foreclosure and homeless prevention, obtaining assisted living services for seniors and expanding low-income housing, in ways OHA has not been able to do previously.

OHA emphasizes the MTW Plan's potential key role in preparing its assistance recipients to compete for employment. With so much of Orlando's economy based on the tourist industry and with a large and growing medical sector, Orlando should have many opportunities for entry-level positions when the economy recovers. But OHA's residents must compete with many individuals who want to live in our beautiful and sunny area, and for entry-level jobs even with Caribbean island residents with temporary work permits. Our residents need basic work readiness and education skills to such an extent that it is worth taking the very serious step of using funding from up to 100 vouchers to enable the creation of the resource center, to help residents obtain those skills and then employment opportunities. Coupled with the efforts OHA already is making, this initiative has potential to have great local impact on individuals' lives and Orlando more generally.

With respect to *national impact*, both OHA's situation, vision and plans place it in a unique situation. OHA is the principal FHA of a substantial metropolitan area in a region, and is a region that is under-represented by MTW (Atlanta is the only MTW PHA in the region). OHA also has a significant accumulation of both public housing and vouchers. This means that OHA's activities can have both significant local impact and national relevance to PHAs that have public housing, vouchers, or both, and that the scale of its programs among eligible PHAs will provide OHA maximum ability to demonstrate the progress that MTW flexibility can make possible.

OHA's MTW activities naturally will evolve over the life of MTW contract, even its initial planning efforts have resulted in a broad but coherent mix of proposed activities that represent a combination of initiatives tried elsewhere and initiatives that have been tried rarely if at all. Every MTW activity proposed even for the first year has the potential to yield important lessons for both local and national use. OHA is committed to ensure that its MTW participation not only provides maximum benefit to OHA subsidy recipients, potential recipients, and the Orlando community, but also maximum advancements in the national public housing and voucher programs through the sharing of its experiences.

Scale

As just discussed, the size of OHA's programs and resources among the PHAs eligible for MTW give OHA the maximum opportunity to have a Plan with the greatest scale, and OHA has developed such a Plan. Its rent proposals are far-reaching and directly address disincentives to self-sufficiency to a greater extent than many other MTW Plans, its additional efficiency-related steps will change the basic operation of its programs, its self-sufficiency efforts potentially will have great impact on its assistance recipients and address Orlando-specific as well as typical household needs, and its housing choice-related efforts take advantage of significant potential development resources and hardly-tried program innovations to respond to diverse housing needs.

Replicability

OHA's combination of coordinated rent and self-sufficiency-related initiatives for non-elderly, non-disabled families; streamlining steps for rent calculations and recertifications, consolidation of public housing and voucher program operations, innovative housing choice-related proposals such as those addressing foreclosure and homeless prevention, and commitment to identify and take all reasonable additional steps to green the OHA, all raise possibilities for replicability of various aspects or in total. OHA's commitment to an evaluation partnership with the University of Central Florida will give HUD and the Nation a further perspective on the replicability of and lessons learned from OHA's MTW program.

V. PROPOSED MTW ACTIVITIES; HUD APPROVAL REQUESTED

The proposed MTW activities are described below. In some cases, multiple activities listed in the Overview of Goals and Objectives have been consolidated below. That is the most useful basis for the description and ongoing evaluation of the activities in question.

The statutory objectives are abbreviated as cost-effectiveness, self-sufficiency, and housing choice, and the relationship of an MTW activity to them is described in “Anticipated Impacts”. With respect to the Attachment C authorizations, the relevant provision of Attachment C is cited; the statutory and regulatory reference is the complete and accurate statutory and regulatory reference specified for that provision in Attachment C of the Standard MTW Agreement.

With respect to rent policy proposals, OHA’s proposed MTW rent policies commencing this year consist of the following initiatives, discussed below in greater detail: (1) a self-sufficiency rent floor (phased-in over four years) for households with non-elderly, non-disabled adults, with a hardship exemption tied to participation in self-sufficiency activities; (2) a streamlined recertification process, accomplished by recertifying households with no non-elderly, non-disabled adults every three years; and (3) a streamlined rent calculation process accomplished by disregarding income the first \$25,000 in assets for rent calculation purposes and eliminating written third-party verifications except on a limited audit basis. These policies are encompassed in MTW Activities 1, 2 and 3.

Activity 1. Self-Sufficiency Rent Floor with Hardship Exemption

A. Description – a self-sufficiency rent floor (Rent Floor) will be phased in over four years to apply to public housing and voucher households with non-elderly, non-disabled adult members. The Rent Floor initially will be set at \$225 per month, prior to the provision of utility allowance. All households, however, shall pay rent after the provision of utility allowances of at least \$100. Households subject to the Rent Floor must participate as appropriate in self-sufficiency resource center activities, and must receive monthly budget counseling. They will receive up to two years of case management training support and referrals, with an additional year on a case by case basis. A Plan of Action will be developed at initial assessment and an agreement encompassing expected household actions will be executed. A hardship exemption is tied to required participation in self-sufficiency activities.

Any additional rental income to OHA as a result of the Rent Floor that HUD permits OHA to retain would be used for activities of the self-sufficiency resource center, to help residents attain self-sufficiency.

Proposed Rent Floor Phase-in Schedule:

SELF-SUFFICIENCY RENT FLOOR--PHASE-IN SCHEDULE	
YEAR	AFFECTED TENANTS
MTW Year 1	All newly admitted public housing households with non-elderly, non-disabled adults All existing households with non-elderly, non-disabled adults living at Citrus Square and Ivey Lane Homes

MTW Year 2	Qualifying households in 1/2 of remaining public housing units
MTW Year 3	Qualifying households in remaining public housing units
MTW Year 4	Qualifying households in the Housing Choice Voucher program

In its Year 2 MTW Plan, OHA expects to propose that households with nonelderly nondisabled adults whose rents exceed the Rent Floor, but with no working members, be treated in the same manner as households subject to the Rent Floor. Applicability of these self-sufficiency-related measures would be phased in for such households on the same schedule as the Rent Floor. OHA will make self-sufficiency services available to such households during Year 1.

The Rent Floor is set at approximately 30% of gross income for an individual working at the minimum wage for 25 hours per week. OHA's proposal for hardship exemptions tied to required participation in self-sufficiency activities is integrally tied to the Rent Floor proposal. As detailed below, the Rent Floor is designed to provide a positive incentive to work and family unification; residents who are making every effort to work but have not yet found employment in this difficult economy will be provided relief.

OHA's self-sufficiency rent floor proposal is designed to address two MTW goals - self-sufficiency and cost-effectiveness - while maintaining affordability. With respect to self-sufficiency, the Rent Floor will remove or reduce several disincentives and perverse incentives created by income-based rents, including:

- the disincentive to increase earnings and employment that is created when increased incomes result in increased rents;
- the incentive to quit employment that is created when decreased incomes result in decreased rents. OHA has seen the impact of that incentive with regard to a disquieting number of its new assistance recipients.
- the disincentive to integrate all working family members into a household that is created when households seek to avoid increasing their overall rent burden. OHA has observed a substantial "silent population" at its public housing communities - individuals, often male parents, who are not included on the lease in order to avoid increasing the rent, but effectively are residing in public housing. OHA seeks to promote family unification and participation of the current silent population in self-sufficiency initiatives, by removing or reducing the rent penalty associated with increasing the number of income-producing persons on the lease.

With respect to cost-effectiveness, the Rent Floor will reduce the administrative burden for OHA in connection with certifications and recertifications, because residents subject to the Rent Floor

all will have the same rent. This change should reduce the amount of staff time dedicated to calculating rents and conducting recertifications.

Proposed Hardship Exemption

To address the needs of tenants for whom the Rent Floor is unaffordable, OHA proposes the following hardship exemption policy.

Hardship exemptions may be granted under the following circumstances:

1. Loss of income due to circumstances beyond the household's ability to control, including the following:
 - temporary medical condition that prevents an adult family member from working when loss of employment is not covered by paid medical benefits
 - loss of employment due to reduction in work force or closure of the place of employment where employment income loss is not covered by severance or separation benefits
 - an increase in medical expenses, such that these expenses exceed 15% of gross income
2. The household is unable to increase income despite documented, substantial efforts or for other compelling reasons.

Hardship determinations will be made by a panel of three members, consisting of one resident and two OHA employees. OHA anticipates that the panel will consist of the resident Commissioner on the OHA Board of Commissioners, the Public Housing Operations Director or his/her designee, and a Community Affairs Department Coordinator, with the chair designated as the Community Affairs Department Coordinator.

The reduced rent amount and the length of the hardship exemption will be determined by the panel. Generally, hardship rents will not be less than the greater of 30% of gross income or \$100 per month and the exemption should not exceed 120 days.

Households receiving hardship exemptions will be required to participate in self-sufficiency activities, and may be allowed to continue hardship rents as long as they are participating. Noncompliance will affect continuing eligibility for the hardship exemption.

Rationale for Phase-in of Self-Sufficiency Rent Floor

OHA proposes that transitioning to the self-sufficiency rent floor occur over time for administrative and programmatic reasons. Administratively, the phase-in will provide time to scale up self-sufficiency-related assistance so that hardship exemption households can be served well. Programmatically, a phase-in will allow OHA to ensure that the Rent Floor is reasonable and accomplishing its purposes, and to assess whether other solutions would better suit the needs of OHA's tenants while remaining feasible for, and consistent with the goals of, OHA.

In view of the large number of voucher-holders, the particular suitability of the voucher program for extremely low-income families and thus its more stringent statutory income targeting requirement than public housing, and the weak economy, OHA has scheduled applicability of the Rent Floor to voucher-holders in the final year of the phase-in. This scheduling will enable OHA to assess implementation in public housing and make any necessary adjustments regarding voucher-holders, and will allow full scaling up of self-sufficiency-related activities prior to applicability of the Rent Floor to voucher-holders.

Evolution of Self-Sufficiency Rent Floor Proposal

OHA recognizes that some of the incentives it seeks might be provided more strongly by a system of flat rents, and OHA considered such a system at length. OHA was concerned, however, that the level at which flat rents would have to be set to provide for revenue neutrality would result in rent increases at levels that could cause hardships for a substantial portion of OHA residents, and this also could result in demands for self-sufficiency assistance that OHA could not fulfill. If flat rents were set to increase with bedroom size in recognition of market values, this would have been even more of a concern because OHA residents' incomes do not necessarily increase with bedroom size needs. The Rent Floor proposal should produce the incentives OHA seeks to a significant degree, while reducing the maximum rent burdens substantially relative to a flat rent proposal and facilitating OHA's goal of providing effective self-sufficiency assistance for affected residents.

OHA also studied the potential impact of the level at which the Rent Floor would be set. OHA concluded that the \$225 level represents a reasonable initial balance of concerns that the Rent Floor be high enough to have the desired incentive effects, but not so high that it would be likely to produce a substantial group of hardship households that OHA would be unequipped to help.

B. Statutory Objective – cost-effectiveness; self-sufficiency.

C. Anticipated Impacts – The anticipated cost-effectiveness impact of this activity is a reduction in staff time dedicated to calculating rents and conducting recertifications for households subject to the Rent Floor. The anticipated self-sufficiency impacts of this activity are (1) an increase in the earned income of families with non-elderly, non-disabled adults; (2) an increase in the number of working adults; (3) a reduction in the number of tenants that quit their jobs after obtaining assisted housing; and (4) an increase in disclosure of income and inclusion on the lease of household members.

Potential unintended consequences of this proposal could result from households unable to increase their incomes in this difficult economy despite required participation in self-sufficiency activities, or unwilling to do so. The consequences could be increased rent burdens and greater than projected requests for hardship exemptions and self-sufficiency-related services. On the other hand, if it turns out that the Rent Floor is set too low, the incentives for increased self-sufficiency efforts and income reporting may not be strong enough to produce the desired results.

D./E. Baseline and Benchmarks; Data Collection Metrics and Protocols; Schedule - Because the proposed self-sufficiency rent floor will be phased in, the baselines and benchmarks must be applied accordingly. Thus, the baseline numbers are stated both on an authority-wide basis (for

public housing, because voucher-holders will not be phased in until the fourth year) and with respect to developments or units initially to be covered by the flat rents (Ivey Lane, Citrus Square, new public housing admissions), and progress against benchmarks must be monitored by making adjustments for the phase-in schedule. Except as otherwise noted, data is for the OHA fiscal year April 1, 2008 through March 31, 2009.

METRICS/PROTOCOLS	BASELINE	BENCHMARK
Amount of income and earnings; will be collected from certification and recertification data	Total earnings of families with non-elderly, non-disabled adults initially covered by Rent Floor All families: \$350,943* Covered initial year: \$159,978	Increase total earnings of families initially covered by Rent Floor by 5% each year, starting in the third MTW year
Number of working adults and heads of households; will be collected from certification and recertification data	Number of working adults and heads of household All families: 396/388** Covered initial year: 102/98	Increase number of working adults and heads of household by 5% each year, starting in the third MTW year
Voluntary loss of employment; will be determined from recertifications after the first year of occupancy	Number of heads of household of families with non-elderly, non-disabled adults with voluntary loss of employment within first year of occupancy All move-ins: 26 (21%)	Decrease number of heads of household with voluntary loss of employment each year by 50%
Number of undeclared occupants who sign leases; will be tracked as this occurs and through annual recertifications	Estimated number of undeclared occupants: 1 for every 2 households All families: 289 Covered initial year: 109	Reduce number of undeclared occupants by 10% annually
Number of staff minutes spent on recertifications; was estimated by a staff study, which will be updated annually	Number of staff minutes spent on recertifications All families: 229,730 for public housing Covered initial year: 36,563	Reduce staff minutes spent on recertifications by 10%
Average earnings; will be collected from certification and recertification data	Average earnings of families with nonelderly, non-disabled adults initially covered by Rent Floor All families: \$3,000* Covered initial year: \$4,102	Increase average earnings of families initially covered by Rent Floor by 5% each year, starting in the third MTW year

* Does not include data from Carver development.

** For Carver development, only earnings data regarding heads of households is available.

OHA has set goals for increased employment commencing in the third MTW year, in view of the current difficult economy and expectation that the initiatives of the self-sufficiency resource center will expand substantially over the first several years.

OHA will track additional information to have a full picture of the effectiveness of this MTW activity. The data tracked will include information specific to Rent Floor households--rents if Rent Floor did not apply, additional rental income to OHA to be devoted to self-sufficiency resource center, rent burden relative to gross income, number of hardship exemptions and success of self-sufficiency efforts (increased earnings). OHA also will track involuntary loss of employment and reductions in hours, specifically including involuntary loss of employment within the first year of occupancy (29 last year, or 23% of new admissions).

OHA is still reviewing its estimates used as benchmarks for staff minutes spent on various activities, specifically including recertifications, and may revise these estimates further prior to the commencement of this activity.

Schedule - For the full implementation schedule, please see Section A. above. The initial effective date of the Rent Floor is projected to be August 1, 2010.

F. Authorization Cited – Attachment C Authorizations: Section C.11 (authorizes alternative rent policies and term limits for public housing), C.4 (authorizes alternative initial, annual and interim income review process for public housing), D.2.a. (authorizes alternative rent policies and term limits for vouchers), D.1.c. (authorizes alternative re-examination process for vouchers). (Notes: The authorizations would cover the full implementation of this activity. Reexamination authorizations are cited in case OHA can simplify any reexamination functions for households who clearly will remain at the Rent Floor.)

G. Rent Reform Initiatives –

a. Board Approval – Please see Section VIII.

b. Impact Analysis – An impact analysis on family contributions and the effect on different protected classes of families and individuals follows. The impact analysis covers only households to whom the Rent Floor will be applicable in this MTW year--households with non-elderly or disabled adult members at Citrus Courts, Ivey Lane, and newly admitted to public housing. With respect to the newly admitted households, the newly admitted households during the OHA fiscal year ending March 31, 2009 were examined for purposes of the impact analysis.

With respect to impact on family contributions, the following tables show households' current rents. This is done for each unit and by race, bedroom size and ethnicity. While the attached tables are for the entire group of 219 households to whom the Rent Floor would be applicable in the first year, OHA also ran the analysis separately for Citrus Courts, Ivey Lane, and newly admitted households to other developments. That analysis can be furnished upon request.

The tables show that 40 of the 219 households (18.3%) would be subject to the Rent Floor. The Rent Floor would mean a monthly rent increase of over \$100 for 2 of these households and \$50-\$100 for 4 households, if such households are not granted hardship exemptions.

With respect to effect on different protected classes, elderly and disabled households are unaffected by OHA’s proposal. For Black heads of households, 35 of 165 households (21.2%) would be affected by the Rent Floor--somewhat higher, but not dramatically higher, than the overall percentage affected. For large-bedroom units (3 or more bedrooms), 21 of 119 households (17.6%) would be affected. For Hispanic heads of households, 5 of 51 households (9.8%) would be affected.

Rent Information covering Households with non-Elderly, Non-Disabled Adults at Citrus Square, Ivey Lane and Moved Into Public Housing Developments 4/1/0/-3/31-09

Number of units by bedroom size: 1 0-br, 5 1-br, 95 2-br, 83 3-br, 27 4-br, 8 5-br; 219 total

Rent Amount

Rent Amount by Race

Rent Amount by BR Size

Rent Amount by Ethnicity

GROSS RENT	# family	GROSS RENT	RACE	# family	GROSS RENT	bed size	# family	GROSS RENT	Ethnicity	# family
100	1	120	BLACK	1	247	0	1	100	HISPANIC	1
120	1	157	BLACK	1	328	1	1	181	HISPANIC	1
157	1	171	BLACK	1	329	1	2	199	HISPANIC	1
171	1	173	BLACK	1	336	1	1	200	HISPANIC	1
173	1	175	BLACK	1	373	1	1	208	HISPANIC	1
175	1	176	BLACK	1	120	2	1	227	HISPANIC	1
176	1	178	BLACK	1	157	2	1	231	HISPANIC	1
178	1	179	BLACK	1	171	2	1	250	HISPANIC	1
179	1	182	BLACK	1	173	2	1	269	HISPANIC	1
181	1	186	BLACK	1	175	2	1	281	HISPANIC	1
182	1	194	BLACK	3	178	2	1	310	HISPANIC	1
186	1	195	BLACK	1	179	2	1	327	HISPANIC	3
194	3	197	BLACK	2	181	2	1	328	HISPANIC	1
195	1	199	BLACK	3	182	2	1	329	HISPANIC	1
197	2	204	BLACK	2	186	2	1	336	HISPANIC	1
199	3	205	BLACK	1	194	2	1	338	HISPANIC	1
200	1	209	BLACK	2	199	2	1	343	HISPANIC	1
204	2	210	BLACK	3	200	2	1	353	HISPANIC	1
205	1	211	BLACK	1	204	2	1	364	HISPANIC	10
208	1	212	BLACK	1	208	2	1	366	HISPANIC	2
209	2	214	BLACK	1	210	2	2	372	HISPANIC	2
210	4	217	BLACK	1	214	2	1	392	HISPANIC	1
211	1	218	BLACK	1	218	2	1	402	HISPANIC	1
212	1	222	BLACK	1	227	2	1	413	HISPANIC	1
214	1	223	BLACK	1	230	2	3	418	HISPANIC	1
217	1	224	BLACK	1	233	2	3	436	HISPANIC	1
218	1	227	BLACK	3	241	2	1	440	HISPANIC	5
222	1	228	BLACK	1	248	2	1	441	HISPANIC	4

GROSS RENT	# family		GROSS RENT	RACE	# family	GROSS RENT	bed size	# family	GROSS RENT	Ethnicity	# family
223	1		230	BLACK	3	250	2	1	463	HISPANIC	1
224	1		233	BLACK	3	254	2	1	470	HISPANIC	1
227	4		241	BLACK	1	258	2	1	588	HISPANIC	1
228	1		247	BLACK	3	261	2	1	120	NON/HISPANIC	1
230	3		248	BLACK	1	267	2	1	157	NON/HISPANIC	1
231	1		251	BLACK	1	268	2	1	171	NON/HISPANIC	1
233	3		252	BLACK	1	269	2	1	173	NON/HISPANIC	1
241	1		254	BLACK	1	274	2	1	175	NON/HISPANIC	1
247	3		256	BLACK	1	275	2	1	176	NON/HISPANIC	1
248	1		258	BLACK	2	288	2	2	178	NON/HISPANIC	1
250	1		261	BLACK	1	327	2	6	179	NON/HISPANIC	1
251	1		267	BLACK	1	330	2	1	182	NON/HISPANIC	1
252	1		268	BLACK	1	331	2	1	186	NON/HISPANIC	1
254	1		274	BLACK	1	341	2	1	194	NON/HISPANIC	3
256	1		275	BLACK	1	342	2	2	195	NON/HISPANIC	1
258	2		280	BLACK	1	344	2	1	197	NON/HISPANIC	2
261	1		281	BLACK	1	352	2	1	199	NON/HISPANIC	2
267	1		288	BLACK	3	353	2	1	204	NON/HISPANIC	2
268	2		293	BLACK	1	358	2	1	205	NON/HISPANIC	1
269	1		299	BLACK	1	359	2	1	209	NON/HISPANIC	2
274	1		300	BLACK	1	363	2	1	210	NON/HISPANIC	4
275	1		301	BLACK	1	364	2	17	211	NON/HISPANIC	1
280	1		306	BLACK	1	366	2	4	212	NON/HISPANIC	1
281	2		317	BLACK	1	371	2	2	214	NON/HISPANIC	1
288	3		319	BLACK	1	372	2	4	217	NON/HISPANIC	1
293	1		322	BLACK	1	374	2	1	218	NON/HISPANIC	1
299	1		324	BLACK	1	392	2	1	222	NON/HISPANIC	1
300	1		327	BLACK	4	397	2	1	223	NON/HISPANIC	1
301	1		328	BLACK	2	399	2	1	224	NON/HISPANIC	1
306	1		329	BLACK	1	407	2	1	227	NON/HISPANIC	3
310	1		330	BLACK	2	418	2	1	228	NON/HISPANIC	1
317	1		331	BLACK	1	436	2	4	230	NON/HISPANIC	3
319	1		332	BLACK	1	496	2	1	233	NON/HISPANIC	3
322	1		336	BLACK	1	548	2	1	241	NON/HISPANIC	1
324	1		337	BLACK	1	176	3	1	247	NON/HISPANIC	3
327	7		340	BLACK	1	194	3	2	248	NON/HISPANIC	1
328	3		341	BLACK	1	197	3	2	251	NON/HISPANIC	1
329	2		342	BLACK	2	199	3	2	252	NON/HISPANIC	1
330	2		343	BLACK	1	204	3	1	254	NON/HISPANIC	1
331	1		344	BLACK	4	205	3	1	256	NON/HISPANIC	1
332	1		348	BLACK	1	209	3	1	258	NON/HISPANIC	2
336	2		349	BLACK	1	210	3	2	261	NON/HISPANIC	1
337	1		351	BLACK	1	211	3	1	267	NON/HISPANIC	1
338	1		352	BLACK	1	217	3	1	268	NON/HISPANIC	2
340	1		353	BLACK	1	224	3	1	274	NON/HISPANIC	1
341	1		358	BLACK	1	227	3	2	275	NON/HISPANIC	1
342	2		359	BLACK	1	251	3	1	280	NON/HISPANIC	1
343	2		361	BLACK	1	252	3	1	281	NON/HISPANIC	1
344	4		362	BLACK	1	280	3	1	288	NON/HISPANIC	3
347	1		363	BLACK	1	281	3	1	293	NON/HISPANIC	1

GROSS RENT	# family		GROSS RENT	RACE	# family	GROSS RENT	bed size	# family	GROSS RENT	Ethnicity	# family
348	1		364	BLACK	7	288	3	1	299	NON/HISPANIC	1
349	1		366	BLACK	4	293	3	1	300	NON/HISPANIC	1
351	1		371	BLACK	3	300	3	1	301	NON/HISPANIC	1
352	1		372	BLACK	2	301	3	1	306	NON/HISPANIC	1
353	2		373	BLACK	1	306	3	1	317	NON/HISPANIC	1
358	1		374	BLACK	1	310	3	1	319	NON/HISPANIC	1
359	1		375	BLACK	1	317	3	1	322	NON/HISPANIC	1
361	1		379	BLACK	1	319	3	1	324	NON/HISPANIC	1
362	1		383	BLACK	1	322	3	1	327	NON/HISPANIC	4
363	1		386	BLACK	1	324	3	1	328	NON/HISPANIC	2
364	18		390	BLACK	1	327	3	1	329	NON/HISPANIC	1
366	5		393	BLACK	1	328	3	1	330	NON/HISPANIC	2
371	3		397	BLACK	1	332	3	1	331	NON/HISPANIC	1
372	4		399	BLACK	1	336	3	1	332	NON/HISPANIC	1
373	1		400	BLACK	1	337	3	1	336	NON/HISPANIC	1
374	1		405	BLACK	1	343	3	2	337	NON/HISPANIC	1
375	1		407	BLACK	2	344	3	3	340	NON/HISPANIC	1
379	1		411	BLACK	1	349	3	1	341	NON/HISPANIC	1
383	1		413	BLACK	1	351	3	1	342	NON/HISPANIC	2
386	1		429	BLACK	1	361	3	1	343	NON/HISPANIC	1
390	1		432	BLACK	1	366	3	1	344	NON/HISPANIC	4
392	1		433	BLACK	1	375	3	1	347	NON/HISPANIC	1
393	1		436	BLACK	3	379	3	1	348	NON/HISPANIC	1
397	1		440	BLACK	4	390	3	1	349	NON/HISPANIC	1
399	1		441	BLACK	1	400	3	1	351	NON/HISPANIC	1
400	1		452	BLACK	1	402	3	1	352	NON/HISPANIC	1
402	1		470	BLACK	4	405	3	1	353	NON/HISPANIC	1
405	1		471	BLACK	2	407	3	1	358	NON/HISPANIC	1
407	2		483	BLACK	1	413	3	1	359	NON/HISPANIC	1
408	1		486	BLACK	1	429	3	1	361	NON/HISPANIC	1
411	1		496	BLACK	1	432	3	1	362	NON/HISPANIC	1
413	1		511	BLACK	1	433	3	1	363	NON/HISPANIC	1
418	1		542	BLACK	1	440	3	10	364	NON/HISPANIC	8
429	1		548	BLACK	1	441	3	5	366	NON/HISPANIC	3
432	1		592	BLACK	1	452	3	1	371	NON/HISPANIC	3
433	1		716	BLACK	1	463	3	1	372	NON/HISPANIC	2
436	4		100	HW/PI	1	470	3	5	373	NON/HISPANIC	1
440	10		470	HW/PI	1	471	3	1	374	NON/HISPANIC	1
441	5		181	OTHER	1	483	3	1	375	NON/HISPANIC	1
452	1		227	OTHER	1	486	3	1	379	NON/HISPANIC	1
463	1		231	OTHER	1	511	3	1	383	NON/HISPANIC	1
470	5		268	OTHER	1	588	3	1	386	NON/HISPANIC	1
471	2		327	OTHER	1	100	4	1	390	NON/HISPANIC	1
483	1		338	OTHER	1	195	4	1	393	NON/HISPANIC	1
486	1		347	OTHER	1	209	4	1	397	NON/HISPANIC	1
496	1		364	OTHER	5	212	4	1	399	NON/HISPANIC	1
511	1		408	OTHER	1	223	4	1	400	NON/HISPANIC	1
542	1		440	OTHER	1	227	4	1	405	NON/HISPANIC	1
548	1		200	WHITE	1	228	4	1	407	NON/HISPANIC	2
588	1		208	WHITE	1	247	4	2	408	NON/HISPANIC	1

GROSS RENT	# family		GROSS RENT	RACE	# family	GROSS RENT	bed size	# family	GROSS RENT	Ethnicity	# family
592	1		210	WHITE	1	268	4	1	411	NON/HISPANIC	1
716	1		250	WHITE	1	281	4	1	429	NON/HISPANIC	1
219			269	WHITE	1	299	4	1	432	NON/HISPANIC	1
			281	WHITE	1	330	4	1	433	NON/HISPANIC	1
			310	WHITE	1	338	4	1	436	NON/HISPANIC	3
			327	WHITE	2	340	4	1	440	NON/HISPANIC	5
			328	WHITE	1	347	4	1	441	NON/HISPANIC	1
			329	WHITE	1	348	4	1	452	NON/HISPANIC	1
			336	WHITE	1	353	4	1	470	NON/HISPANIC	4
			343	WHITE	1	362	4	1	471	NON/HISPANIC	2
			353	WHITE	1	364	4	1	483	NON/HISPANIC	1
			364	WHITE	6	371	4	1	486	NON/HISPANIC	1
			366	WHITE	1	383	4	1	496	NON/HISPANIC	1
			372	WHITE	2	408	4	1	511	NON/HISPANIC	1
			392	WHITE	1	411	4	1	542	NON/HISPANIC	1
			402	WHITE	1	471	4	1	548	NON/HISPANIC	1
			418	WHITE	1	542	4	1	592	NON/HISPANIC	1
			436	WHITE	1	716	4	1	716	NON/HISPANIC	1
			440	WHITE	5	222	5	1			219
			441	WHITE	4	231	5	1			
			463	WHITE	1	256	5	1			
			588	WHITE	1	258	5	1			
			219			328	5	1			
						386	5	1			
						393	5	1			
						592	5	1			
						219					

The impact of the proposed Rent Floor must be evaluated in part by taking into consideration the effect of the hardship exemption. The hardship exemption is designed to ensure that households who cannot earn sufficient amounts to afford the Rent Floor will be able instead to pay affordable rents, typically at 30% of gross income, while they are assisted with self-sufficiency goals on an individual basis.

As indicated earlier, OHA examined flat rents as an alternative to the Rent Floor at great length. OHA decided that while flat rents would provide the strongest incentives to work and to report income as well as additional rent calculation efficiencies, the Rent Floor would retain those incentives to a significant extent and provide some efficiencies. At the same time, the Rent Floor would avoid considerably more substantial potential hardships than flat rents set at a level necessary to maintain OHA revenue neutrality. Moreover, approximately one third of non-elderly, non-disabled households in the public housing already are paying OHA's current flat rents at higher levels than required flat rents would be set. Reductions in those households' rents would not have any of the desired incentive effects and would have to be made up by charging other households

higher rents to maintain revenue neutrality.

Thus, OHA concluded that the self-sufficiency rent floor proposal constitutes the best balance of promoting cost-effectiveness and self-sufficiency while avoiding hardships. OHA will monitor whether the proposal in combination with other MTW initiatives is accomplishing its goals, and may propose a modified Rent Floor level, flat rents or other modifications if they appear to be needed in later years.

- c. Annual Re-evaluation* – Accordingly, OHA will reevaluate this proposal on an annual basis.
- d. Hardship Case Criteria* – Please see A. for a detailed description of such criteria and related implementation information.
- e. Transition Period* – This proposal will implemented on the schedule described in A.
- f. Public Hearing* – The public hearings on November 12, 2009 and December 7, 2009 covered this rent reform initiative. Please see Section VIII.

Activity 2. Streamline the Recertification Process

A. Description – OHA will streamline the recertification process, by recertifying households with no non-elderly, non-disabled adults every three years. The elderly/disabled households will be recertified every three years, with automatic inflation adjustments for fixed-income programs (e.g., social security or supplemental security income). These households will have to report household composition and sign HUD Form 9886 annually.

B. Statutory Objective – cost-effectiveness

C. Anticipated Impacts – There would be reduced staff time needed for recertifications. Potential unintended consequences of the proposal could include greater than anticipated loss of rental income to OHA resulting from elderly/disabled household income increases greater than the annual inflation adjustments.

D./ E. Baseline and Benchmarks; Data Collection Metrics and Protocols; Schedule –

METRICS/PROTOCOLS	BASELINE	BENCHMARK
Number of staff minutes spent on recertifications; will be estimated by staff studies.	Number of staff minutes spent on rent calculations and recertifications for public housing and voucher programs Households with no	Reduce staff minutes spent on rent calculations and recertifications by 50% for households with no non-elderly, nondisabled adults (limited savings in the

	non-elderly, non-disabled adults: 224,182	first year)
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In addition, total incomes for elderly/disabled households will be examined at the full reexamination dates to determine differences relative to the estimates used in the years for which no recertification was done.

Schedule -OHA expects to recertify all households with no non-elderly, non-disabled adults between August 1, 2010 and January 1, 2011, except that households who have been recertified within the past six months will not be recertified. All households with no non-elderly, non-disabled adults then will be exempt from full recertification for the next two years.

F. Authorization Cited – Attachment C Authorization: Sections C.11 (authorizes alternative rent policies and term limits) and C.4. (authorizes alternative initial annual and interim income review process) for public housing; Section D.2.a. (authorizes alternative rent policies and term limits) and D.1.c. (authorizes alternative reexamination process) for vouchers.

G. Rent Reform Initiatives –

- a. **Board Approval** – Please see Submission Item 7 of the application.
- b. **Impact Analysis** – The impact on family contributions of this proposal is expected to be minimal. Family contributions will be reduced as a result of the inclusion in income only every three years of any income increases greater than inflation adjustments in fixed-income programs. Households may continue to request interim recertifications if their incomes drop. Because overall impact would be minimal and generally result in reduced family contributions, there should be no possibility of a significant differential impact on protected classes of households.
- c. **Annual Re-evaluation** – OHA will reevaluate this proposal on an annual basis.
- d. **Hardship** – There will be no hardship exemption, because this proposal generally reduces households’ administrative and reduces or maintains their financial burden and households may continue to request interim recertifications if their incomes drop.
- e. **Transition Period** – This proposal should not result in hardships to households or substantial administrative difficulties, and thus no transition period is needed.
- f. **Public Hearing** – The public hearings on November 12, 2009 and December 7, 2009 covered this rent reform initiative. Please see Section VIII.

Activity 3. Streamline the Rent Calculation Process

A. Description - OHA will streamline the rent calculation process, by disregarding income from the first \$25,000 in assets for rent calculation purposes and eliminating written third-party verifications except on a limited audit basis. Rather than written third-party verifications, households could present income documentation (such as pay stubs) acceptable to OHA. The Enterprise Information Verification (EIV) system will continue to be used.

B. Statutory Objective - cost effectiveness

C. Anticipated Impacts - There would be reduced staff time needed for rent calculation. Elimination of written third-party verifications also would result in reduced time to complete recertifications, which no longer would have to be delayed to await receipt of these verifications. Potential unintended consequences of the proposal could include greater than anticipated loss of rental income to OHA resulting from the exclusion of assets or the new income documentation policy.

D./ E. Baseline and Benchmarks; Data Collection Metrics and Protocols; Schedule –

METRICS/PROTOCOLS	BASELINE	BENCHMARK
<p>Number of staff minutes spent on rent calculations and recertifications; will be estimated by staff studies.</p> <p>Number of staff minutes saved by eliminating written third party verifications; will be estimated by staff studies.</p> <p>Time to complete recertifications; will be measured by staff studies of the opening and closing of individual household relocation activities</p>	<p>Number of staff minutes spent on rent calculations and recertifications for public housing and voucher programs Total: 383,730</p> <p>Number of staff minutes spent on third-party verifications: 124,980</p> <p>Time to complete recertifications: 90 days</p>	<p>Reduce staff minutes spent on rent calculations and recertifications by 50% for households with no non-elderly, non-disabled adults and by 10% for other households</p> <p>Reduce staff minutes spent on third party verifications by 50%</p> <p>Reduce time to complete recertifications; to 60 days</p>

Financial reports also will be prepared indicating revenue loss from the \$25,000 asset disregard. The total report income from assets is now \$24,980 for calendar 2009. Thus, the maximum rent loss is not greater than 30% of that number, or \$7,494.

Schedule - The \$25,000 asset disregard and change in third-party verification policy would be implemented at households' next recertifications, commencing in the month starting at least two weeks after HUD approval of this Annual MTW Plan.

F. Authorization Cited – Attachment C Authorization: Sections C.11 (authorizes alternative rent policies and term limits) and C.4. (authorizes alternative initial annual and interim income review process) for public housing; Section D.2.a. (authorizes alternative rent policies and term limits) and D.1.c. (authorizes alternative reexamination process) for vouchers.

G. Rent Reform Initiatives –

- a. **Board Approval** – Please see Section VIII.
- b. **Impact Analysis** – The impact on family contributions of this proposal is expected to be minimal. Family contributions will be reduced as a result of the exclusion of the first \$25,000 on assets. Because overall impact would result in reduced family contributions, there is no possibility of a significant differential impact on protected classes of households.
- c. **Annual Re-evaluation** – OHA will reevaluate this proposal on an annual basis.
- d. **Hardship** – This proposal will not result in hardships to households or substantial administrative difficulties and thus no transition period is needed.
- e. **Transition Period** – This proposal will not result in hardships to households or substantial administrative difficulties, and thus no transition period is needed.
- f. **Public Hearing** – The public hearings on November 12, 2009 and December 7, 2009 covered this rent reform initiative. Please see Section VIII.

Activity 4. Consolidation of Inspection and Recertification Processes

A. Description – OHA would consolidate public housing and voucher inspection and recertification requirements where possible to increase cost-effectiveness. Both programs would use Housing Quality Standards (HQS) as the inspection standard for evaluation, rather than continued application of Uniform Physical Condition Standards (UPCS) for public housing, provided that OHA still can remain eligible to be scored under PHAS and thus for the Capital Fund bonus for high performers. Inspection and recertification schedules would be scheduled by location of the development or units, rather than the date a household initially received assistance.

B. Statutory Objective – cost-effectiveness.

C. Anticipated Impacts – It is anticipated that the standardization and coordination of inspection and recertification processes among the programs would result in a reduction in staff time and contract costs, thus increasing cost-effectiveness and freeing up resources for other MTW activities. This would occur because inspectors could undertake annual inspections in the same complexes within geographic areas, thus saving time and money on transportation. Similarly, recertifications could be organized to be undertaken with mobile units that could conduct all

recertifications at once at a public housing location or geographic area where voucher-assisted stock is located. The standardization of inspection standards would allow OHA more future flexibility to determine whether to continue inspection of public housing by contractors and vouchers by OHA staff.

D./ E. Baseline and Benchmarks; Data Collection Metrics and Protocols; Schedule –

METRICS/PROTOCOLS	BASELINE	BENCHMARK
Number of staff minutes spent on recertifications and inspections; will be estimated by staff studies Inspection contract costs; will be tracked directly	Number of staff minutes spent on recertifications and inspections, or contract costs Recertifications (staff minutes): 383,730 Inspections-- Staff minutes for vouchers (annual inspections): 154,500 Contract costs for public housing: \$15,874	Reduce staff minutes or contract costs spent on recertifications and inspections by 20%

The reduction in staff minutes spent on recertifications would be in addition to reductions caused by other MTW Activities 1 and 2. The staff studies would estimate savings directly attributable to this MTW Activity. Savings in expenses (e.g., for gasoline) also would be estimated.

OHA does not anticipate any appreciable change in the continuing quality of public housing units to result from the switch to HQS as a basis for evaluation. To help ensure continued quality OHA will continue to do random inspections for housekeeping on 10% of total units. Those inspections will generate work orders as needed.

Schedule - This MTW Activity would be implemented throughout the initial MTW Plan year, commencing with recertifications starting August 1, 2010. Inspections will be scheduled to coordinate substantially with recertifications, largely from January through March. The coordination would not be exact, because the recertification process takes longer than the inspection process. As a transition measure, households who have been recertified within the past six months would not be recertified again until the following year; thus, the maximum time between recertifications would be eighteen months. (No similar step would be needed with respect to inspections.) OHA will continue to ensure that the 15-month limitation of the resident authorization form (HUD 9886) is met.

OHA will propose an alternative evaluation system for public housing under which an independent inspecting entity will use HQs rather than UPCS, by the end of the MTW Plan year. The results of that discussion with HUD may affect future inspection schedules.

F. Authorization Cited – Attachment C Authorization: Section C.4 (authorizes alternative public housing income review process), C.9 (authorizes simplification of property management practices), D.1.c. (authorizes alternative voucher reexamination program).

G, Rent Reform Initiatives – Not applicable.

Activity 5. Provide Interim Voucher Assistance and Related Counseling to Prevent Foreclosures

A. Description – OHA will provide interim voucher assistance, generally for up to 6 months and not for more than 1 year, for homeowners that are newly unemployed or otherwise facing temporary hardships and are threatened with foreclosure. OHA will expand a successful program for foreclosure prevention counseling that is now offered to families in its public housing homeownership program, to serve the low-income homeowners who receive the vouchers. OHA anticipates using approximately 50 vouchers for this purpose, although OHA does not anticipate achieving this volume in the first year.

More specifically, OHA will offer assistance to eligible homeowners that have received foreclosure prevention assistance from the City of Orlando, have received assistance from the OHA or are OHA employees or in OHA's discretion, are referred by other OHA partners. Through the City's program, eligible families receive financial assistance in conjunction with comprehensive foreclosure prevention counseling. This counseling is provided by two HUD-certified housing counseling agencies, the Mortgage Credit Center of Orlando or Central Florida HANDS (Housing and Neighborhood Development Services).

The City of Orlando Foreclosure Prevention Program (FPP) provides one-time financial assistance to help homeowners within the city limits are delinquent or in default on their mortgage payments. Applicants must have fallen behind on payments due to unforeseen circumstances such as loss of income, divorce, medical issues, etc. The City assistance is in the form of a zero-interest deferred loan.

The OHA will provide up to 50 vouchers to families that have received foreclosure prevention assistance from the City of Orlando to bring their payments current, or to other families in need of such assistance as specified above. OHA's initiative will combine further short-term financial assistance with comprehensive counseling and case management.

Client Selection

Clients at substantial risk of suffering a foreclosure will be selected by referral of the City of Orlando or other partners, or from households who have received OHA homeownership assistance or are OHA employees based on the following criteria:

- family income is at or below 80% of area median income,
- family has some form of income, wages, unemployment, SSI or disability,
- if not employed, client must be actively seeking employment, training or participating in job-training program,
- the client must have reasonable prospects of averting foreclosure if temporary voucher assistance and additional counseling are provided.

Financial Assistance

Assistance will be provided to families who are experiencing issues impacting on their ability to maintain their homes due to insufficient income, mounting utility bills, medical bills, etc.

Financial assistance will be in the form of monthly mortgage assistance for a period generally of up to 6 months to help stabilize the families and prevent foreclosure. Up to the amount of the payment standard for the bedroom size of the unit, OHA may make monthly homeownership assistance payments on behalf of the participant to include the following:

- mortgage principal and interest
- mortgage insurance
- real estate taxes
- homeowner's insurance

If the total principal and interest payments are less than or equal to the payment standard in the Orlando MSA, participants will pay 30% of their adjusted monthly income toward expenses and OHA will pay the balance directly to the mortgage company.

Case Management

OHA's homeownership staff will provide supplemental counseling and case management support to participants. OHA staff will collaborate with MTW partnership agencies to provide supportive services to participants. Upon approval, voucher recipients will develop individual case plans to outline goals and strategies to enhance self-sufficiency and achieve short term budgetary goals. The OHA Resource Center will serve as the hub for information and referral service delivery to participants. The homeownership staff will provide information and referral on job training opportunities, employability skills development, GED classes, English as a Second Language, budgeting and credit repair. Participants in need of employment assistance will be referred to OHA's job recruiter for assistance.

Participants will be required to meet with homeownership staff monthly to review goals, status and plans of action. OHA staff will be available to meet at times convenient for participant families.

OHA staff will use the "At-a-Glance Client Tracking System" to maintain participant case plans and information. This specialized computer software offers centralized case management and referral capability. The system will be accessible to key staff and will enhance efficiency of the Program. This program currently is used by OHA staff.

B. Statutory Objective – housing choice. Self-sufficiency also will be bolstered through OHA's counseling efforts.

C. Anticipated Impacts – The activity should help distressed low-income homeowners prevent foreclosures, by providing interim housing assistance and related counseling. This activity also will build upon the efforts of the City of Orlando's Foreclosure Prevention Program by focusing on low-income distressed homeowners. More specifically, the City provides assistance to satisfy the arrears, bring the mortgages current and halt pending foreclosure actions. The OHA initiative would go a step further and provide a voucher to help pay mortgage payments generally for a period of up to 6 months. This extra support would be a temporary safety net to help stabilize the family while they get on their feet.

D./ E. Baseline and Benchmarks; Data Collection Metrics and Protocols; Schedule –

METRICS/PROTOCOLS	BASELINE	BENCHMARK
<p>OHA will track the number of homeowners assisted with interim vouchers and counseling</p> <p>OHA will track the number and percentage of foreclosures among the assisted households for one year after interim assistance ends</p> <p>The percentage of foreclosures will be compared with that of unassisted homeowners in similar situations to the extent data is available</p>	<p>Number of homeowners currently provided foreclosure prevention interim vouchers and counseling by OHA: 0</p>	<p>Assist 50 homeowners at any time; prevent foreclosure in 40 cases over time (likely a few in first year)</p>

Schedule - OHA will commence this initiative as soon within the first year as it can amend its Section 8 Administrative Plan as needed and put intake and counseling resources in place, which should be within the first six months. The initiative would be scheduled to serve 50 families over time, but likely no more than half that amount in the first year.

F. Authorization Cited – Attachment C Authorization: Section B.1 (single fund budget with full flexibility) will allow MTW funds to be used for this activity if necessary. Other relevant authorizations: Section B.4. (authorizes new short-term transitional housing programs), Section D.2.d. (authorizes term limits for vouchers), Section D.8.a. (authorizes reasonable Section 8 homeownership programs).

G. Rent Reform Initiatives – Not applicable.

Activity 6. Provide Additional Transitional Housing with Supportive Services for Homeless Households

A. Description – OHA would use its current public housing ACC authority to provide approximately 50 additional public housing units over time, for this purpose to create additional “floating” 1-bedroom units, at its currently unassisted 280-unit West Oaks development. This would be done in conjunction with an agreement by the Central Florida Commission on Homelessness (the Commission) to provide the necessary supportive services, including counseling and permanent housing placement assistance. The term of assistance would be limited to 18 months. The building’s current mortgage would be subordinated to a public housing Declaration of Trust.

B. Statutory Objective – housing choice; self-sufficiency.

C. Anticipated Impacts – This activity will result in the housing of an additional 50 homeless individuals and improvement in their self-sufficiency and living situation through supportive

services. Concerns include operational impact on the West Oaks development and the need for successful placement in permanent housing after the transitional assistance ends.

D./ E. Baseline and Benchmarks; Data Collection Metrics and Protocols; Schedule –

METRICS/PROTOCOLS	BASELINE	BENCHMARK
Public housing development costs, times to reach development milestones and lines, admission rates for the households and services provided will be tracked by OHA (housing) or the Commission (services)	Number of transitional units for the homeless currently provided by OHA: 0	Complete the conversion of 50 units to public housing and have supportive services in place to serve 50 households; at least 5 by the end of the first year
OHA will require that households report housing and employment/earnings status for two years after the transitional period	Number of assisted households that obtain employment and/or increase earnings: 0	80% of households obtain employment and/or increase earnings prior to termination of housing assistance

Schedule - Take all steps necessary to convert units to public housing through the acquisition method, sign an agreement with the Commission, make necessary changes in admissions policies and have services in place so that an initial group of homeless individuals may be served by the end of the first year.

F. Authorization Cited – Attachment C Authorization: Section B.4 (authorizes short-term transitional housing programs), Section C.13 (authorizes acquisition of sites for public housing without prior HUD approval, provided the agency certifies that HUD site selection requirements have been met), Section C.15 (authorizes agencies to make available public housing property for the purpose of providing services, programs and capital improvements that benefit residents and program participants).

G. Rent Reform Initiatives – Not applicable.

Activity 7: Use Project-based Vouchers to Develop City-Donated Property for Low-Income Elderly Housing

A. Description – OHA operates an older 75-unit property on City-owned land that is located downtown in an area now much more suited to commercial use than to housing. The property has been partially vacated. OHA plans to demolish the housing and build a new development for approximately 95 elderly low-income households, which would be sufficient to relocate all elderly households now living in the development (other remaining families already are in the relocation process). The City would retain the current property for ultimate commercial use and would donate a downtown site in a strong residential neighborhood. OHA would project-base vouchers at approximately 45 units, which should help OHA secure low-income housing tax credits or other necessary financing to develop the new housing.

B. Statutory Objective – housing choice; cost effectiveness

C. Anticipated Impacts – This activity will result in a new, larger community and thus offer better housing and additional units for Orlando’s low-income elderly households.

D./ E. Baseline and Benchmarks; Data Collection Metrics and Protocols; Schedule –

METRICS/PROTOCOLS	BASELINE	BENCHMARK
OHA will track the number of new units produced, development milestones (site location and acquisition, completion of financing and architectural plans, commencement of construction, completion of new development), relocation of residents to new development, and lease-up	Number of units in present building: 75	Increase number of units by approximately 20 units; complete new development, including approximately 45 units with project-based vouchers; successfully relocate current residents (complete within three years)
Cost savings from eliminating PBV competitive process	Estimated staff and related costs of PBV competitive process: \$50,000	Eliminate staff and related costs of PBV competitive process

Schedule - The development activity will be substantial, with total development costs in the \$15-20 million range, and is dependent on financing potentially including low-income housing tax credits. The schedule for the MTW Plan year is to have the site agreed upon and acquired from the City and preliminary architectural and financing plans completed.

F. Authorization Cited – Attachment C authorization: Section D.7.a. (authorization to establish a reasonable policy for project-basing Section 8 tenant-based assistance, including authorization to award project-based vouchers to properties owned by the PHA subject to subsidy layering requirements).

G. Rent Reform Initiatives – Not applicable.

VI. ONGOING MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

Because this is OHA's first MTW year there are no such activities. See Section VII for a description of outside evaluations to be used.

VII. SOURCES AND USES OF FUNDING

A. Planned Sources and Uses of MTW Funds

CONSOLIDATED SOURCES AND USES OF MTW FUNDS (FISCAL YEAR 2010)	
REVENUE (SOURCES)	
Public housing operating	\$5,218,030
Public housing capital (formula grant including Replacement Housing Factor)	\$ 3,326,845
Housing Choice Vouchers (not special purpose)	\$19,397,456
TOTAL REVENUE (available for MTW)	\$27,942,271
EXPENSE (USES)	
Public housing operating	\$ 5,218,030
Public housing capital	\$ 3,326,845
Housing Choice Vouchers	\$18,637,456
MTW activities (maximum amount; specific uses are enumerated below)	\$ 760,000
TOTAL EXPENSE	\$27,942,271
NET INCOME/LOSS	\$0

The foregoing numbers are for 2010, except that the public housing capital fund grant is at the 2009 level.

B. Planned Sources and Uses of State/Local Funds

OHA does not receive or administer state or local funds. Several elements of OHA's MTW Plan, however, have strong linkages with other state, local or federal initiatives. The 1-stop center's efforts will be fully integrated with other local self-sufficiency efforts, such as those of the local Workforce Investment Act entity, Work Force Central Florida, the local welfare department, the Department of Families and Children, and the Orange County Public Schools, and will build upon the collaborations already developed with other agencies by OHA's Family Services Department. The foreclosure prevention assistance initiative and the homeless/transitional housing initiative will complement the City's Foreclosure Prevention Program, and the homeless/transitional housing will rely on supportive services to be provided through the Central Florida Commission on Homelessness. The new low-income housing for the elderly is anticipated to be developed partly through use of low-income housing tax credits allocated through the Florida Housing Finance Corporation.

Submission Item 8 of OHA's application for MTW designation explained in depth the role of fourteen OHA partners in potential MTW initiatives. These partners include:

Florida Department of Children and Families

Workforce Central Florida

Goodwill Industries of Central Florida

The Jobs Partnership of Florida

Frontline Outreach

Community Coordinated Child Care

Florida Department of Health

City of Orlando

Central Florida Commission on Homelessness

University of Central Florida

Central Florida Regional Transportation Authority (LYNX)

Orange County Public Schools

Valencia Community College

Enterprise Community Partners

C. Planned Sources and Uses of Central Office Cost Center (COCC)

OHA will continue to use COCC funds for public housing.

D. Alternative Cost Allocation or Fee for Service Methodology

Not applicable.

E. Use of Single-Fund Flexibility

OHA carefully has reviewed its potential sources and uses of funds for MTW activities. OHA has determined that in the first year of MTW, it will use calendar 2010 funding that otherwise would be committed for up to 100 vouchers. The funding will be made available through attrition from the voucher program.

OHA is acutely aware of the serious tradeoffs involved in not using these funds to serve 100 families with vouchers, and has made the judgment that MTW activities it can fund from these sources will provide greater benefit for the households in need of OHA's services. Emphasis will be on activities related to self-sufficiency that have leveraging or leveraging potential, as

well as a contingency for green-related activities such as resident training. OHA anticipates the use of these funding sources for MTW activities would continue on an annual basis if needed and if the MTW activities are effective.

OHA also is aware of its MTW obligation to continue to assist substantially the same total number of eligible low income families as would have been served had funding amounts not been combined. In that connection, OHA again brings to HUD's attention that its number of families served in the voucher program has been dropping as a result of an extraordinary number of reasonable accommodations requests, which result in additional subsidy expended per family. If the growth in such requests continues, the number of families served will be reduced irrespective of any impact of MTW.

The currently-budgeted MTW activities include contingencies for partnership-related and green activities. If not all of the budgeted funds are needed, OHA may use the remaining funds for additional vouchers. On the other hand, if more funds than \$725,000 are needed, OHA would use up to \$333,829 in fiscal 2009 Replacement Housing Factor funds if available. The use of these funds otherwise would be restricted to public housing replacement, and they have been pledged for that use in the pending Lake Mann HOPE VI application. Because a budget for the full fiscal year is shown for clarity's sake but OHA's MTW Plan will be approved several months into the fiscal year, OHA is likely not to expend the full amounts listed.

OHA also has committed that any increases in its rental income resulting from the Rent Floor will be used for the Self-Sufficiency Resource Center, if HUD allows OHA to retain these funds. Because the Rent Floor is new and being phased in, OHA has not yet budgeted funding from this source.

USES OF SINGLE-FUND FLEXIBILITY		
REVENUE (SOURCES)		
Funding for 100 vouchers--otherwise restricted to voucher subsidies		\$760,000
TOTAL REVENUE		\$760,000
Self-Sufficiency Resource Center:		
One-Stop Center Non-Dwelling Equipment	\$60,000	
Center Expenses	\$20,000	
Center Staffing		
CSS Counselor/Recruiter	\$62,400	
CSS Counselors/Hearings	\$62,400	
FSS/Support Serv/Sec 3	\$50,000	
Receptionist	\$30,000	
Coordinator	\$80,000	
Support Services	\$47,000	\$331,800

Partnerships	\$143,200
MTW Evaluation	\$30,000
Day Care Center	\$60,000
Energy Conservation	\$40,000
MTW Consultant	\$75,000
Uses of Vouchers for MTW Activities:	
Section 8 Voucher (95 vouchers; \$7600 per voucher)	
	\$380,000 Foreclosure Prevention, Activity 5 (up to 50 vouchers)

1. One-stop self-sufficiency resource center

OHA is highlighting the following activities made possible by its use of single-fund flexibility: OHA has an under-used facility, which it is refurbishing and will use as a one-stop self-sufficiency resource center (Center). The Center will be the focal point of additional employment, employment readiness, education and other self-sufficiency activities to assist OHA subsidy recipients. A recruiter will be hired to help individuals with job placement and access to other local employment services. The recruiter will be assisted by counselors. The recruiter and counselors will help individuals with individual development plans and access to education, training and job opportunities. Potential workers in households receiving hardship exemptions from flat rents will be required to participate.

The Center will offer linkages with basic educational programs such as General Educational Development (GED) programs, training such as work readiness training through Goodwill Industries, and the services of Workforce Central Florida, the local workforce investment board. Arrangements would be made for a licensed childcare provider to provide approximately 40 slots in critical off-hours. OHA will work with the Central Florida Regional Transportation Authority (LYNX) to provide off-hour transportation to major job sites, particularly where not centrally located. OHA also will provide a shuttle bus or van if needed, and will provide bus passes to the Center for residents in need. The Center also will seek specific linkages with major employers, including large medical facilities and the recreational attractions, to provide specific employment and training opportunities.

The Center will build upon OHA's substantial casework and partnering experience and its partnerships with various educational, employment and training-related entities. The Center also will be located at Ivey Lane, which is located so that it can be accessed by LYNX reasonably well by subsidized households, and will coordinate the work of satellite efforts at Carver Homes and at Lake Mann if the pending HOPE VI application is approved.

The Center will address the statutory objective of self-sufficiency. Its activities will provide greatly expanded access for OHA subsidy recipients to employment-related education, preparation and training, and placement. The difficult economy and many residents' needs for basic education and work preparation skills are obstacles to success, but make even more

important this strategic investment in residents' individual development to complement OHA's outstanding delivery of housing services.

OHA will track the number of individuals using the center services; number of these individuals who complete basic education or training; number of these individuals who obtain or retain employment, and earnings of these individuals. OHA also will track all costs of the Center separately.

Refurbishment as needed and opening of the Center will occur by August 1, 2010. Establishment of links to initial education, training and employment programs and the childcare initiatives will occur in the first year. Implementation of transportation initiatives will begin in the first year, but largely occur thereafter. The Center initially will serve public housing residents, but will serve voucher-holders in later years.

2. Greening of OHA

While OHA already has done substantial and nationally recognized energy conservation work and made other improvements that contribute to the health of its residents, there is more to do to green the OHA. OHA is working with Enterprise Community Partners (Enterprise) to identify all reasonable additional steps and means for accomplishing them. Among the clear remaining concerns are mildew issues and the need for resident training regarding energy conservation, which should matter directly to residents because they pay utility bills.

This initiative supports all three statutory objectives. Cost-effectiveness can be served by further reductions in utility expenses, which will help both OHA and its residents (almost all public housing residents pay for utilities directly) and takes on more importance as a result of recent large utility rate increases (e.g., 20% increase in electricity rates of one of the large utilities in 2009, which particularly affects developments heated with electricity). Self-sufficiency will be assisted to the extent this initiative results in a healthier housing environment and thus better enables residents to work. The initiative supports housing choice by providing for better quality, more environmentally sensitive housing as a living option in Orlando's low-income housing portfolio.

OHA has a greening plan that was implemented in part with American Reinvestment and Recovery Act funds. OHA will work with Enterprise to identify additional steps that are still needed and schedule the initiatives agreed upon.

OHA will track annual utility consumption, as well as annual reported incidences of mildew infestation. For each specific implementation step agreed-upon, OHA will track impact appropriately (e.g., payback periods for additional energy investments, Section 3 jobs created)

3. MTW Evaluation Partnership with University of Central Florida (UCF)

Particularly in view of the number and scope of proposed MTW activities, and the paramount importance OHA places on evaluation of their success, OHA will expend MTW funds to engage UCF to assist with evaluation activities. It is anticipated that UCF will provide assistance with initial baselines and annual reporting regarding the success of MTW activities, along with any recommendations for their improvements. The reports will include UCF suggestions regarding data

collection. This would add an independent local reviewer in addition to the evaluation activities to be directly sponsored or undertaken by HUD.

This initiative will support all three statutory objectives, by closely tracking MTW's success and encouraging timely changes to make the activities more effective. OHA will address all annual UCF recommendations within three months of receipt of a report

F. MTW Revenue and Expenses Impact

The proposed self-sufficiency rent floor directly would change the amount of rental income that OHA receives. Because any increase in OHA revenue resulting from the Rent Floor that OHA is permitted to retain will be redirected to support the self-sufficiency resource center, however, there will be no net revenue impact from that change.

The changes supporting the statutory objectives of cost-effectiveness, including streamlining of the rent calculation and recertification process, the consolidation of public housing and voucher requirements and other MTW activities, should save money by reducing staff time devoted to these activities. Additional greening activities should save utilities costs. The savings then can be used for the cost of other MTW activities.

While the cost of self-sufficiency activities in the MTW Plan will be absorbed by OHA's partners to the extent possible, some of these activities will require OHA funds as estimated in the MTW Sources and Uses table above. The proposed expenditures would leverage or otherwise result in critical additional assistance for OHA residents.

As noted above, these changes largely amount to the shifting of funds among potential OHA uses of public housing and voucher funds. The MTW Plan as a whole is not anticipated to have a substantial net effect on OHA public housing and voucher revenues and expenses, but will leverage additional services and funding and otherwise will result in expanded housing and related self-sufficiency services to assist Orlando's low-income population.

VIII. ADMINISTRATIVE

A. Board Resolution

The applicable Board resolution was passed as part of the MTW application process, and is attached.

OHA held a far more extensive public participation process than HUD required in connection with this application, including two public hearings, meetings with the Resident Advisory Board and every individual resident organization, three meetings with community stakeholder groups other than residents, and numerous meetings with individual stakeholder entities. Extensive evidence and discussion of the public participation process was contained in Submission Item 5 of OHA's MTW application.

The residents and community participants generally were supportive of the proposals in the MTW Plan. The biggest concerns were regarding OHA's initial flat rent proposal and from elderly residents in particular, who were concerned that the flat rents might apply to them. In response to those and other concerns discussed earlier, OHA substituted its self-sufficiency rent floor proposal for flat rents and limited the applicability of that proposal to households with non-elderly, non-disabled adult members. This is discussed further in Section V, Activity 1.

At the first of the two hearings, the OHA Board of Commissioners expressed strong support for the draft application and MTW Plan and stated that MTW will be a major step forward for MTW residents. The Board of Commissioners expressed particular concern that OHA staff set any flat rents carefully to ensure the fiscal responsibility of the initiative. At the second of the two hearings, the Board of Commissioners asked a number of questions regarding the proposed MTW activities. The issues they raised are addressed in this Plan. For example, the final Plan clarifies that the resources for MTW funding will come from voucher program attrition and that no program terminations will be undertaken to generate this funding.

OHA staff and consultants painstakingly considered the extensive feedback from this process and revised the draft MTW Plan many times. The final MTW Plan includes improvements that will contribute greatly to the Plan's feasibility and local support.

B. Agency-Directed Evaluations

The demonstration will be evaluated by OHA in conjunction with UCF, which will provide an annual report. This initiative is discussed further in Section VII.

ORLANDO HOUSING AUTHORITY
RESOLUTION NUMBER HA- _____
DATE OF FINAL PASSAGE _____

WHEREAS, on the U.S. Department of Housing and Urban Development [HUD] issued Notice 2009-29, inviting applications from eligible housing authorities to participate in the Moving To Work (MTW) demonstration program (the Notice); and

WHEREAS, the Orlando Housing Authority has prepared an application to HUD for participation in MTW, which provides local flexibility to design and test various approaches for providing and administering housing assistance including an Annual MTW Plan for the first year of operation under MTW (the Plan), and

WHEREAS, the Notice requires that the Housing Authority authorize the submission of the application including the Plan, as well as providing certain assurances regarding the elements of the MTW demonstration;

NOW, THEREFORE, BE IT RESOLVED, that the Orlando Housing Authority [Authority] approves for submission an application to the Department of Housing and Urban Development [HUD] to participate in the MTW demonstration program, including the Plan, based upon the information described in Housing Authority Report _____;

BE IT FURTHER RESOLVED, that the Authority approves the Plan and specifically the rent policy described in the Plan;

BE IT FURTHER RESOLVED, that the Authority certifies that in the implementation of MTW, The Authority will

- (a) Provide that at least 75% of the families initially assisted under MTW by the PHA will be very low-income families (i.e., families with incomes of less than 50% of area median income);
- (b) Establish a reasonable rent policy that is designed to encourage employment and self-sufficiency on the part of participating families;
- (c) Continue to assist substantially the same total number of low-income families under the demonstration as would have been served if HUD funding sources has not been combined;
- (d) Maintain under the demonstration a comparable mix of families, by family size, as would have been assisted if HUD funding sources had not been combined;
- (e) Ensure that housing assisted under MTW meets housing quality standards established or approved by HUD;
- (f) Comply with the reporting requirements as set forth in form HUD-50900;
- (g) Comply with Fair Housing and Equal Opportunity Requirements as listed in 24 CFR Part 5, and the Americans with Disabilities Act of 1990; and

(h) Comply with 24 CFR Part 50 or Part 58 environmental review procedures. The PHA agrees (i) to carry out and required mitigating measures or select an alternate eligible property, if permitted by HUD, and (ii) not to acquire, rehabilitate, convert, lease, repair, or construct property, or commit HUD or local funds to such program activities with respect to any eligible property until approval by the cognizant unit of general local government under 24 CFR Part 58, or HUD approval under 24 CFR Part 50 is received.

BE IT FURTHER RESOLVED, that the Authority adopts the Annual MTW Plan Certification of Compliance, attached hereto;

BE IT FURTHER RESOLVED, that the Executive Director of the Orlando Housing Commission or her designee is hereby authorized to execute all necessary documents required to receive such approval.

APPROVED:

By: _____