

**FY2020**

**The  
Orlando  
Housing  
Authority**



**[MOVING TO WORK(MTW)  
ANNUAL PLAN]**

**Submitted January 16, 2019  
OHA Executive Office  
April 1, 2019 through March 31, 2020**

# FY2019 Moving to Work (MTW) Annual Plan

April 1, 2019 – March 31, 2020

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# SECTION I

# INTRODUCTION

## SECTION I – INTRODUCTION

### A. Overview of the Orlando Housing Authority's (OHA) Short-Term and Long-Term Goals and Objectives

#### **MTW Activities**

As an MTW agency, the OHA is allowed flexibility to modify certain requirements in order to achieve one or more of the following MTW statutory objectives:

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

In general, the OHA's short term and long term goals are to continue to implement the current MTW activities and uses of funds. One of the goals of the OHA is to demolish the Lake Mann, Griffin Park, Ivey Lane, Reeves Terrace, Murchison Terrace, and Lorna Doone developments. The OHA will submit an application to the Special Applications Center (SAC) with the intention of revitalizing those neighborhoods with innovative housing. The OHA may identify the need for changes to its ongoing MTW activities and uses of funds. If that is the case, the OHA will seek approval from HUD for any significant changes to plan activities.

All activities and uses of funds are discussed, in detail, in the plan. In FY2020, the OHA is re-proposing two (2) previously approved activities, due to planned significant changes in rent reform, to the U.S. Department of Housing and Urban Development's (HUD) for approval.

The OHA is re-proposing Activity 1: \$225 Rent Floor for Non-Elderly and Non-Disabled Households. The OHA is modifying this activity from a \$225 rent floor to a \$225 minimum rent and adding a minimum part-time work requirement. Additional rent reform measures are also being proposed to simplify rent calculations, increase revenue for the OHA, and encourage self-sufficiency amongst the residents and participants.

The OHA is also re-proposing Activity 9: Establishment of an Agency-Wide \$100 Minimum Rent; HUD's minimum rent is \$50. This activity is applicable to all households except non-elderly & non-disabled residents & participants, VASH, Tenant Based Rental Assistance participants (non-MTW), Tenant Based Rental Assistance participants (Activity 10), and Antioch residents (non-MTW). It has been fully implemented to all public housing residents and housing choice participants to which this activity applies. Even so, similar to Activity 1, other rent reform measures are being proposed to simplify rent calculations and increase revenue for the OHA.

Activity 2: Streamline the Recertification Process in the Public Housing and Housing Choice Voucher Programs, has been fully implemented. One-third of the OHA's population takes part in a full recertification, while the remaining two-thirds complete an annual update. There are some planned insignificant changes to this activity that include defining the triennial reexaminations groups.

Activity 8: Project-Based Vouchers in OHA Owned Properties, has been fully implemented and is currently in an ongoing progress of placement.

Activity 10: Tenant-Based Voucher Homelessness Prevention Program, remains in the early stages of its development, although there has been some progress.

Activity 11: The Project-Based Homeownership Program, which is a Section 8 Project-Based Homeownership Program, begins with the development of 82 homeownership units at Carver Park. The City of Orlando is constructing 41 homes, and the OHA is constructing the other 41 homes. Planning is currently underway.

Activity 13: Streamlined Public Housing Inspections will allow the OHA to inspect the public housing units of those residents that are due for their triennial recertification. The OHA looks forward to the implementation of this activity and the opportunity to evaluate how it assists the OHA in meeting the MTW objectives.

In FY19, the OHA implemented a smoke-free policy at all OHA sites and administrative offices. Throughout the year, the OHA met with residents and resident councils to inform them (verbally and written) of the change and the implications. A representative from Smoke-Free Orlando met with residents and provided them information and materials about smoke cessation. Physical “smoke-free” signs were posted throughout each site and at the administrative offices. In the end, all residents signed a lease addendum acknowledging the new smoke-free policy.

In the foreseeable future, the OHA and the Sanford Housing Authority (SHA) may submit voluntary transfer letters to their respective field offices indicating an agreement to transfer the SHA’s HCVs to the OHA. The SHA does not have any public housing units; however, it does have public housing land that will be transferred. This act will, essentially, merge both housing authorities together into just the Orlando Housing Authority.

### **Non-MTW Activities**

The OHA administers a number of non-MTW programs. Such programs include, but are not limited to, the following:

- (1) vouchers for non-elderly persons with disabilities (NED),
- (2) HUD Veteran Affairs Supportive Housing (VASH) vouchers,
- (3) vouchers for single-room occupancy (SRO),
- (4) family unification vouchers (FUP),
- (5) resident opportunities and supportive services (ROSS),
- (6) family self-sufficiency program (FSS),
- (7) non-public housing or Housing Choice Voucher (HCV) units,
- (8) administration of the Sanford Housing Authority (SHA) by way of an interlocal agreement, and
- (9) administration of OHA vouchers in the Sanford jurisdiction

These programs are essential in their support and assistance to residents and participants that are not involved in MTW activities. For uniformity, the OHA received HUD approval to extend the MTW flexibilities it received for the housing choice voucher program to the Sanford Housing Authority (SHA) vouchers. The OHA is now able to apply the flexibilities to its Single Room Occupancy (SRO) program.

The OHA’s non-public housing complexes are located at West Oaks Apartments (180 one and two bedroom units) and Antioch Manor (a project-based section 202 property consisting of 101 units for the elderly). The OHA’s other non-public housing unit is the 75 unit Jackson Court/Division Oaks Development, which is owned by Orlando Properties Inc. Jackson Court is a 58 unit, 3 story senior housing apartment complex with one bedroom units only. Division Oaks is a two story, 17 unit family apartment complex.

In addition, the OHA maintains oversight of the Carver Park HOPE VI development, which includes the Landings at Carver Park and the Villas at Carver Park. The Landings at Carver Park is 56 units of affordable housing for families (26 tax credit units and 30 tax credit/public housing hybrid units). The Villas at Carver Park is a 64 unit tax credit/public housing apartment complex for the elderly.

The OHA’s long term plan for its non-MTW programs is to implement the recently approved Project-Based Voucher activity at the OHA owned sites. The OHA will also continue to manage its properties and to seek opportunities to increase its housing portfolio such that additional affordable housing options are available to the community. In addition, the OHA is committed to improving the quality of housing provided to its residents as funding permits.

Lift Orlando, a local non-profit organization whose mission is to break the cycle of poverty through neighborhood revitalization, has partnered with the OHA to redevelop Orlando's Washington Shores community – Pendana, formerly The Villages of West Lakes. Now Washington Shores includes the OHA's Lake Mann Homes and Lorna Doone Apartments. Lift Orlando has embarked on the redevelopment of a significant area of blighted housing west of downtown Orlando. The OHA is partnering by providing 20 project-based vouchers for low-income families and 24 PBVs for seniors to improve affordability.

### **Project-Based VASH**

The OHA will project-base forty-five (45) Veterans Affairs Supportive Housing (VASH) vouchers at select locations within Orange County. The OHA will collaborate with viable partners in the community to execute this initiative with the purpose of housing difficult to place homeless veterans.

### **Rental Assistance Demonstration Program**

In March 2015, the OHA received approval from HUD for a Rental Assistance Demonstration (RAD) Portfolio Award for the Citrus Square public housing site. The approval also provided the opportunity for the OHA to submit an application in FY2017 to convert the units located at Lorna Doone Apartment, of which the OHA did complete. In December 2015, the OHA requested an amendment to its FY2016 MTW Plan to incorporate the RAD program, which HUD approved in January 2016. The OHA will also consider the feasibility of transitioning more of its public housing properties to RAD properties.

### **Citrus Square Apartments**

Citrus Square Apartments, built in 1982, is an 87 unit, multi-family property comprising 45 buildings situated on 10 acres in east Orlando. Citrus Square has central air and heating, polypropylene siding, ceramic tile throughout and washer/dryer hook ups. The property has a basketball court, city recreation and computer learning center, individual parking, an on-site manager's office and a playground. Citrus is located on a major retail/commercial corridor, minutes from the Orlando International Airport and 15 minutes from downtown Orlando. There is direct access to public transportation and a wide range of shopping and service opportunities nearby.

The OHA submitted a RAD application in December 2013 to convert units at Citrus Square to Project Based Vouchers (PBV) under the RAD program. HUD issued a RAD CHAP (Commitment to Enter into a Housing Assistance Payment) on March 27, 2015.

The Citrus Square RAD Conversion closed on December 28, 2017. The OHA expended \$577,531 of the MTW block grant fund, excluding debt repayment, to complete the conversion. Ovation Housing LLLP owns Citrus Square, and Stephenson and Moore manage the property. As of August 2018, the occupancy rate is 91%. Citrus Square is doing rehabilitation on all 87 units as prescribed by the physical needs analysis, and 5 ADA units are undergoing significant rehabilitation.

Included in the RAD Portfolio application for Citrus Square Apartments, the OHA received approval to submit an application to convert the units at Lorna Doone Apartments in March 2015. Based on that approval, the OHA submitted a RAD application for Lorna Doone in March 2016. HUD issued a RAD CHAP (Commitment to Enter into a Housing Assistance Payment) for Lorna Doone in April 2018.

The OHA submitted another RAD Portfolio application, which included Reeves Terrace [The Villas at Hampton Park is included in the Asset Management Project (AMP) with Reeves Terrace], Ivey Lane, Lake Mann, Griffin Park, The Villas at Carver Park, and The Landings at Carver Park to HUD in January 2018. In May 2018, HUD issued a RAD CHAP (Commitment to Enter into a Housing Assistance Payment) for the RAD conversion at 4 of those 6 properties: Reeves Terrace, Ivey Lane, Lake Mann, and Griffin Park. The Landings and The Villas at Carver Park did not meet the RAD requirements; therefore, they were not approved. The OHA has decided not to pursue RAD conversions at any of its approved properties, including Lorna Doone.

**Sanford Housing Authority (SHA)**

The OHA continues to manage the Sanford Housing Authority (SHA). The goals and objectives for SHA are to redevelop its former public housing sites. In FY2016, the SHA was awarded the Choice Neighborhoods Planning grant in the amount of \$500,000. This grant will support the development of a comprehensive neighborhood Transformation Plan for Castle Brewer Court (including William Clark Court,) Edward Higgins Terrace (including Cowan Moughton Terrace), and Lake Monroe Terrace in the Goldsboro neighborhood. The Planning grant will be completed in FY2018. Additionally, the OHA and the SHA will look at other opportunities that continue to lay the foundation for the redevelopment of the former public housing sites.



**SECTION II**  
**GENERAL HOUSING AUTHORITY**  
**OPERATING INFORMATION**

## SECTION II - GENERAL HOUSING AUTHORITY OPERATING INFORMATION

### A. Housing Stock Information

Planned New Public Housing Units											
AMP Name and Number	Bedroom Size							Total Units	Population Type	Fully Accessible	Adaptable
	0	1	2	3	4	5	6+				
PIC Dev. #/AMP PIC Dev. Name	0	0	0	0	0	0	0	0	N/A	N/A	N/A

Total Public Housing Units to be Added in the Plan Year **0**

Planned Public Housing Units to be Removed		
AMP Name and Number	Number of Units to be Removed	Explanation for Removal
N/A		

Total Public Housing Units to be Removed in the Plan Year **0**

Planned New Project-Based Vouchers			
Property Name	Number of Vouchers to be Project-Based	RAD	Description of Project
West Oaks	5	No	<b>Activity 6: Transitional Housing</b> The OHA is project-basing up to 50 units to provide transitional housing to homeless individuals (up to twenty-four months) at West Oaks Apartments, a three story 280 unit affordable market rate rental property. The OHA is working with the Wayne Densch Center, Inc., the Orlando Union Rescue Mission, and other service providers to provide case management as a homelessness preventative measure.
Pendana at West Lake (Phase II)	24	No	Lift Orlando has partnered with the OHA to redevelop Orlando's Washington Shores community, formerly The Villages of West Lakes. Lift Orlando has embarked on the redevelopment of a significant area of blighted housing west of downtown Orlando. Phase I is complete, and the OHA has dedicated 20 vouchers to that phase. Demolition is underway for phase II. The OHA is partnering by providing an additional 24 project-based vouchers to improve affordability for low-income seniors.
Redding Gardens/ Georgetown Square	38	No	The OHA is managing the Sanford Housing Authority (SHA) day to day operations and redevelopment. The SHA received a tax credit award to redevelop 90 units at the former Redding Gardens site. The tax credit market saw a sharp drop in equity causing a gap in funding. The developer, Gardner Capital, requested PBVs to be placed in the project, so that additional debt could be used along with a Florida Housing Finance Corporation loan to cover the gap financing.
Carver Park	36	No	The OHA will build 41 (forty-one) homes on the undeveloped lots west of Westmoreland Drive at Caver Park. Five (5) of those homes will be sold through the OHA at market rate, and the remaining 36 (thirty-six) homes will be project-base voucher rentals.

**103** Planned Total Vouchers to be Newly Project-Based

Planned Existing Project-Based Vouchers				
Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD	Description of Project
Citrus Square	87	Converted	Yes	Citrus Square Apartments is located at 5625 Hickey Avenue. The property consists of 45 buildings and includes (9) 1-bedroom units; (56) 2-bedroom units; (17) 3-bedroom units and (4) 4-bedroom units. The RAD Conversion of Citrus Square allows for the proper maintenance of the complex, necessary repairs/upgrades, and the improvement of accessible units. The RAD conversion closed in December 2017.
West Oaks	66*	Ongoing	No	<b>Activity 6: Transitional Housing</b> The OHA is project-basing up to fifty units to provide transitional housing to homeless individuals (up to twenty-four months) at West Oaks Apartments, a three story 280 unit affordable market rate rental property. The OHA is working with the Wayne Densch Center, Inc., the Orlando Union Rescue Mission, and other service providers to provide case management as a homelessness preventative measure. A total of fifty (50) vouchers/units are to be committed for Activity 6 by the end of FY2018.
Jackson Court/ Division Oaks/West Oaks	75**	Ongoing	No	<b>Activity 8: PBVs in OHA Owned Units</b> The OHA is project-basing up to 20% or 538 of its available tenant-based HCVs at OHA owned units. Jackson Court, Division Oaks, and West Oaks (in addition to the vouchers to be used in connection with Activity 6) are sites for the project-based voucher program.
Pendana at West Lake (Phase I)	20	Ongoing	No	Lift Orlando has partnered with the OHA to redevelop Orlando's Washington Shores community, formerly The Villages of West Lakes. Lift Orlando has embarked on the redevelopment of a significant area of blighted housing west of downtown Orlando. Phase I is complete, and the OHA has partnered by providing 20 project-based vouchers for the chronic and low-income homeless in Orlando.

**248** Planned Total Existing Project-Based Vouchers

\*This number is a cumulative number of rotating vouchers that have been issued since the inception of the activity.

\*\*This number is a cumulative number of rotating vouchers that have been issued at those sites since the inception of the activity. All data is as of August 2018.

### Planned Changes to the MTW Housing Stock Anticipated During the Plan Year

The OHA executed a Section 504 and a Section 3 Voluntary Compliance Agreement (VCA) with HUD in April 2015. The VCAs' duration is for a minimum of three years. The agreements include but are not limited to the following highlights:

#### Section 504 VCA

- Hire a 504/ADA/Reasonable Accommodation Coordinator (complete)
- Construct or convert a minimum of 5% or 76 public housing units into UFAS-accessible units. The construction ranges from minor or moderate modifications to major rehabilitation.
- Modify existing policies; specifically resident transportation, effective communication, transfers, service/emotional support animals, and reasonable accommodations.
- Supplement OHA's existing educational program to improve employees' ability to understand disability related laws.
- Provide initial and refresher notices to head of households describing the Agreement. Also provide copies of the Agreement to each manager and duly elected Resident Council.

#### Section 3 VCA

- Hire a Section 3 Coordinator (complete)
- Supplementation of the already existing Section 3 Plan.
- Supplementation of the staff educational program related to the requirements of Section 3.
- Providing training for all current and new employees who are responsible for any Section 3 activities.

On November 13, 2017, the OHA executed an Amended Section 504 Agreement. The term of the Amended Section 504 Agreement is for a minimum of 5 years. The Amended Section 504 Agreement includes but is not limited to the following highlighted requirements:

- Modification of the OHA reasonable accommodation policy and procedures.
- Notifying residents and participants of delays in processing reasonable accommodation requests.
- Tracking implementation dates of approved reasonable accommodations.
- Engaging in the interactive process with Section 8 landlords to facilitate the implementation of approved reasonable accommodations.
- Reviewing the public housing Needs Assessment submitted to FHEO on December 1, 2015 to ensure that any outstanding items have been addressed. Conduct a new Needs Assessment of the Section 8 program.
- Modify the letter sent to applicants in regards to their status on the wait list.

### General Description of All Planned Capital Expenditures During the Plan Year

OHA has \$857,478 of planned expenditures for the public housing sites' Capital Fund Financing Program loan repayment to Deutsche Bank.

OHA plans to address much needed health and safety issues in public housing. OHA will expend capital funds to address mold, mildew, and termite issues and ongoing capital improvements. The termite infestation will be addressed at Griffin Park, and the mold/mildew issues will be addressed at every property. OHA will address other safety issues across its Asset Management properties. OHA also plans to continue making site improvements at each of the OHA sites.

While OHA will shift some funds to address the health and safety issues above, OHA anticipates using approximately \$500,000 in Capital Funds in FY2020 to retrofit units to meet VCA/ADA/UFAS requirements at many of its properties.

#### **Non-Capital Expenses**

Non-Capital Expenditures include administrative salaries, security guard service, and architectural services/fees.

B. Leasing Information

Planned Number of Households Served		
Planned Number of Households Served Through:	Planned Number of Units Months Occupied/Leased	Planned Number of Households to be Served
MTW Public Housing Units Leased	17,496	1,458
MTW Housing Choice Voucher (HCV) Units Utilized	28,716	2,393
Local, Non-Traditional: Tenant-Based	0	0
Local, Non-Traditional: Property-Based	1,212	101
Local, Non-Traditional: Homeownership	0	

<b>Planned Households Served</b>	<b>47,424</b>	<b>3,952</b>
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Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number of Units Months Occupied/Leased	Planned Number of Households to be Served
Tenant-Based		0	0
Property-Based	Jackson Court/Division Oaks/West Oaks (Activity 8)*	972	81
Property-Based	West Oaks (Activity 6)	240	20
Homeownership		0	0

\*15% of 538 committed units or 81

Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing	
Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Public Housing	<p>The main issue related to leasing public housing units is that a substantial number of applicants have low response rates when selected to start the application process. However, in FY2019, the OHA purged and reopened the waitlist for new applicants in April 2018, which should improve this issue. The OHA has also increased its waitlist assignment numbers, efficiency processes for review of eligibility, and the vacant unit turnaround process to enhance the number of units available for lease-ups.</p> <p>Other issues impacting public housing occupancy include mold, mildew, termites, and VCA unit modifications. When a unit is found to have high elevations of mold and/or mildew, remediation is required and the unit is not available for lease-up due to the extra time required to complete the testing. The OHA has requested approval from HUD to remove units from occupancy at Reeves Terrace due to extensive structural damage caused by termites, and the OHA is responsible for holding those units offline to complete the relocation process. The units previously approved by HUD for VCA modifications will continue to be off-line until the modifications are completed and inspected by a third party.</p> <p>Unit refusals by applicants have risen within the last fiscal year. The OHA has had an extremely difficult time leasing efficiency units or family units in older properties due to a high number of repetitive refusals. The OHA is using opportunities such as RAD and/or Section 18 Demolition to transform its housing stock and make modernization improvements that will meet the needs of potential residents.</p>

	The last lease issue deals with how the OHA responds to displaced people due to declared disasters, such as hurricanes. Units may take longer to be leased to these individuals due to a lack of required paperwork, money, and other factors that affect displaced people. If Federal Emergency Management Agency (FEMA) dollars could go towards utility deposits and other necessary expenses needed for permanent settlement, then these individuals could be placed in public housing quicker.
Housing Choice Voucher (HCV)	Funding is a potential issue for the HCV program. The OHA may not have enough administrative support to comply with HUD's leasing requirements. The OHA may have to find creative ways to reduce expenses and increase revenue.

C. Wait List Information

Wait List Information Projected for the Beginning of the Fiscal Year				
Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
MTW Public Housing Units	Community Wide	2,680	Open	N/A
MTW Housing Choice Voucher	Community Wide	5,683	Closed	No
MTW Public Housing Units	Site-Based*	1,296	Closed	No

\*This includes Carver Park Villas & Carver Park Landings

Both the Public Housing and Housing Choice Voucher wait lists were purged beginning in January 2018.

This data is as of March 2018.

**Please describe any duplication of applicants across waiting lists:**

Planned Changes to Waiting List in the Plan Year	
Waiting List Name	Description of Planned Changes to Waiting List
N/A	

# **SECTION III**

## **RE-PROPOSED ACTIVITIES**

## SECTION III – RE-PROPOSED MTW ACTIVITIES

### Activity 1: \$225 Minimum Rent for Non-Elderly and Non-Disabled Households

Approval & Implementation Year: Activity 1 was first approved in FY2012. The phased-in implementation began in the Initial Demonstration Period.

Description: Phase in the implementation of a self-sufficiency rent floor of \$225 for households that are not elderly and not disabled. The implementation of the rent floor includes a referral to the MTW Resource Center for non-elderly and non-disabled households not paying \$225 at the time the rent floor is implemented. The implementation of the \$225 rent floor provides hardship exceptions linked to self-sufficiency activities. In the beginning, self-sufficiency resources were only available to public housing residents. In FY2019, the OHA began offering self-sufficiency services to HCV participants that cannot pay the \$225 rent floor in phases.

Public housing residents and housing choice voucher participants who are non-elderly and non-disabled and cannot pay the \$225 rent floor are referred to the MTW Resource Center. The MTW Resource Center provides self-sufficiency services including, but not limited to, case management, needs assessments, employability counseling, and job referral/placement assistance services for a maximum of two years for each adult referred. Use of a computer lab, transportation (bus passes), and child care assistance is provided to help participants secure and maintain employment. The OHA monitors the progress of households subject to the rent floor relative to accomplishing the goals identified in their self-sufficiency plan until sufficiency is reached. Residents and participants that are unable to pay the rent floor or attend the Resource Center may seek hardship relief.

Status: Partially implemented.

Planned Non-Significant Changes: The OHA is changing the name of this activity from “\$225 Rent Floor for Non-Elderly and Non-Disabled Households” to “\$225 Minimum Rent for Non-Elderly and Non-Disabled Household.” The significant changes are outlined below.

Planned Changes to Metrics/Data Collection: OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Planned Significant Changes: Currently, the OHA has a rent floor or total tenant payment (TTP) of \$225 for all non-elderly and non-disabled heads of household. Rent is calculated based on 30% of earned income. From there, allowed deductions are taken, and the TTP is calculated. The TTP must meet the rent floor of \$225; if not, the TTP is then adjusted to the rent floor of \$225. Lastly, the utility allowance is deducted from the TTP. Consequently, this practice has resulted in residents and participants paying less than \$225 in rent. To simplify rent calculations and increase revenue, the OHA is modifying its \$225 rent floor to a \$225 minimum rent payment.

Instead of the TTP, the new minimum rent will be \$225 for all non-elderly and non-disabled heads of households. Rent will be calculated from all income sources instead of just earned income. All household deductions will be eliminated (elderly/disabled, dependent, medical, childcare, earned income disallowance, and adult/full time student wages) from the rent calculation. A standard utility allowance will be given for both public housing and HCV (an example is attached in the appendix). All non-elderly and/or non-disabled heads of household and/or spouses with a disabled family member(s) and all non-elderly and non-disabled incoming portability heads of household must pay at least the minimum rent of \$225. Hardship rent will be



fixed at \$100, and the OHA self-sufficiency definition (resident or participant paying at least the minimum of \$225 in rent) will remain the same.

The OHA is also implementing a minimum 28 hour work requirement for all non-elderly and non-disabled heads of households or spouses, including all incoming portability heads of household. Residents and participants will be informed of this change at the beginning of the OHA fiscal year (April 1, 2019). There is a minimum 20 hour work requirement for all non-elderly and non-disabled heads of households or spouses, including all incoming portability heads of household that are pursuing full-time educational opportunities. Residents and participants will have one (1) full year to gain employment. By April 1, 2020 all non-elderly and non-disabled heads of households or spouses must demonstrate employment at either their annual reexamination or online update. Residents and/or participants that are not able to gain lawful employment will be referred to the MTW Resource Center, which provides self-sufficiency services including, but not limited to, case management, needs assessments, employability counseling, and job referral/placement assistance services for a maximum of two years. The OHA will not terminate a resident/participant if he or she does not obtain employment after two years of services at the MTW Resource Center; the OHA will extend the time needed to obtain employment. A resident/participant will only be terminated from the public housing or HCV programs if he or she does not follow the action plan, as agreed.

The table below summarizes the proposed rent reform changes.

Applies to Non-Elderly and Non-Disabled Households Only		
	Current OHA Rent Structure	Proposed OHA Rent Structure
<b>I</b>	\$225 rent floor or Total Tenant Payment (TTP)	\$225 minimum rent
<b>II</b>	\$225 rent floor calculated from earned income only	\$225 minimum rent calculated from all income sources
<b>III</b>	\$225 rent floor applicable to non-elderly and non-disabled heads of household	\$225 minimum rent applicable to: <ul style="list-style-type: none"> <li>i. Non-elderly and non-disabled heads of household</li> <li>ii. Non-elderly and/or non-disabled heads of household and/or spouses with a disabled family member(s)</li> <li>iii. Non-elderly and non-disabled incoming portability heads of households</li> </ul>
<b>IV</b>	Rent is based on 30% of adjusted annual income	Rent is based on 30% of annual income
<b>V</b>	Assets to be used in rent calculations: <ul style="list-style-type: none"> <li>i. Banking (Savings &amp; Checking)</li> <li>ii. Assets over \$25,000</li> <li>iii. Life Insurance policies</li> <li>iv. Real Estate</li> </ul>	Assets to be used in rent calculations: <ul style="list-style-type: none"> <li>i. Banking (Savings &amp; Checking)</li> <li>ii. Assets over \$25,000</li> <li>iii. Life Insurance policies</li> <li>iv. Real Estate</li> </ul>
<b>VI</b>	Deductions allowed: <ul style="list-style-type: none"> <li>i. Elderly/Disabled</li> <li>ii. Dependent</li> <li>iii. Medical</li> <li>iv. Childcare</li> <li>v. Earned Income Disallowance (EID)</li> <li>vi. Adult/Full-Time Student Wages</li> </ul>	No household deductions
<b>VII</b>	Utility allowance: <ul style="list-style-type: none"> <li>i. Public Housing – Separate, based on community</li> <li>ii. HCV – Separate, based on dwelling type</li> </ul>	One standardized utility allowance for public housing and one for HCV.
<b>VIII</b>	Hardship rent: Varies case by case	Hardship rent: \$100
<b>IX</b>	No work requirement	<ul style="list-style-type: none"> <li>I. Minimum 28 hour work requirement</li> <li>II. Minimum 20 hour work requirement, if pursuing full-time educational opportunities</li> </ul>

<b>\$225 Minimum Rent Calculation Examples</b>				
Applies to Non-Elderly and Non-Disabled Households Only				
	<b>Current OHA Rent Structure</b>		<b>Proposed OHA Rent Structure</b>	
	<b>\$225 Rent Floor/Total Tenant Payment</b>		<b>\$225 Minimum Rent</b>	
	<b>Amount</b>	<b>Math</b>	<b>Amount</b>	<b>Math</b>
<b>Annual Income</b>	\$15,000		\$15,000	
<b>Deductions</b>	(\$8,000)		(\$0)	
<b>Adjusted Annual Income</b>	\$7,000	$(\$15,000 - \$8,000 = \$7,000)$	\$15,000	$(\$15,000 - \$0 = \$15,000)$
<b>Yearly Rent</b> <i>(Based on 30% of Adjusted Annual Income)</i>	\$2,100	$(\$7,000 * 0.30 = \$2,100)$	\$4,500	$(\$15,000 * 0.30 = \$4,500)$
<b>Total Tenant Payment (TTP)</b>	\$175	$(\$2,100 / 12 = \$175)$	\$375	$(\$4,500 / 12 = \$375)$
<b>Adjusted \$225 TTP</b>	\$225		N/A	
<b>Utility Allowance</b> <i>(Based on 1 Bedroom)</i>	(\$88)		(\$88)	
<b>\$225 Rent Floor</b>	<b>\$137</b>	$(\$225 - 88 = \$137)$	N/A	
<b>\$225 Minimum Rent</b>	N/A		<b>\$287</b>	$(\$375 - 88 = \$287)$

In this example, the current rent structure yields a monthly rent of \$137. The proposed rent structure yields a monthly rent of \$287. The difference between the \$225 rent floor and the \$225 minimum rent results in an increase of revenue for the OHA of \$150 monthly and \$1,800 yearly. Under the proposed rent structure, the resident/participant would pay 23% of yearly gross income towards rent; whereas, under the current rent structure, only 11% of gross income would go towards rent. Although, it increases the rent share for the resident/participant, as well, the new rent is still well below the fair market rent in Orlando.

The elimination and replacement of the \$225 rent floor will allow the OHA to straightforwardly calculate rents. As the current rent structure illustrates, the actual TTP is \$175; however, due to the OHA's \$225 rent floor policy, the TTP is adjusted to \$225 because it failed to meet that threshold. From there, the utility allowance is deducted, and the final rent is formulated. The \$225 minimum rent will remove such complications while minimizing the time needed to calculate rent, reducing potential calculation errors, and allowing for consistent rent calculations for across both programs.

A random sampling of OHA resident and participant rents were compared utilizing both the current and proposed rent structures. Under the new proposed rent structure, the average rent increased by \$51 or 13% for public housing, and \$42 or 110% for HCV.

Standardized Utility Allowance

To ensure uniformity, while conforming to HUD regulations, utilities will be assessed and reviewed annually. Once the utility rates are provided, by an outside contractor, the OHA will review the rates and do an average of the costs to apply to each utility by bedroom size for both the HCV and public housing programs.

Below are estimates of the new standard utility allowances based on the basic average costs from the 2018 utility rates that the OHA is currently using for both the HCV and public housing programs.

Public Housing 2019 Standard Utility Allowance (Units without Water & Sewer)				
Unit Type	Average Monthly Gas	Average Monthly Electric	Water & Sewer	Total Monthly Allowance
0 Bedroom	\$33	\$53	\$0	<b>\$86</b>
1 Bedroom	\$37	\$51	\$0	<b>\$88</b>
2 Bedroom	\$39	\$51	\$0	<b>\$90</b>
3 Bedroom	\$47	\$59	\$0	<b>\$106</b>
4 Bedroom	\$54	\$70	\$0	<b>\$124</b>
5 Bedroom	\$65	\$52	\$0	<b>\$117</b>
6 Bedroom	\$77	\$74	\$0	<b>\$151</b>

Public Housing 2019 Standard Utility Allowance (Units with Water & Sewer)				
Unit Type	Average Monthly Gas	Average Monthly Electric	Water & Sewer	Total Monthly Allowance
1 Bedroom	\$37	\$51	\$49	<b>\$137</b>
2 Bedroom	\$39	\$51	\$51	<b>\$141</b>
3 Bedroom	\$47	\$59	\$52	<b>\$158</b>
4 Bedroom	\$54	\$70	\$61	<b>\$185</b>

HCV 2019 Standard Utility Allowance							
Locality: Orange County, Florida		Unit Type: All			Date: 1/1/2019		
Utility or Service	Monthly Dollar Allowances; Number of Bedrooms						
	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
<b>Heating</b> <i>(Includes Natural Gas, Electric Resistance, Heat Pump, &amp; LPG/Propane)</i>	\$4	\$6	\$7	\$8	\$11	\$13	\$15
<b>Cooking</b> <i>(Includes Natural Gas, Electric Resistance, &amp; LPG/Propane)</i>	\$10	\$14	\$17	\$20	\$23	\$26	\$29
<b>Other Electric/Lighting</b>	\$29	\$40	\$50	\$61	\$71	\$81	\$90
<b>Air Conditioning</b>	\$9	\$20	\$33	\$43	\$65	\$80	\$89
<b>Water Heating</b> <i>(Includes Natural Gas, Electric, &amp; LPG/Propane)</i>	\$15	\$30	\$46	\$61	\$76	\$92	\$91
<b>Water</b> <i>(Includes Orlando, Winter Park, Apopka, &amp; Winter Garden)</i>	\$10	\$11	\$14	\$17	\$18	\$28	\$31
<b>Sewer</b> <i>(Includes Orlando, Winter Park, Apopka, &amp; Winter Garden)</i>	\$19	\$23	\$30	\$40	\$50	\$58	\$64
<b>Trash</b> <i>(Includes Orlando, Winter Park, Apopka, &amp; Winter Garden)</i>	\$19	\$19	\$19	\$19	\$19	\$19	\$19
<b>Actual Family Allowances</b> To be used by the family to compute allowance. Complete below for the actual unit rented.				<b>Utility or Service</b>		<b>Per month Cost</b>	
Name of Family				Heating		\$	
				Cooking			
				Other Electric			
				Air Conditioning			
Address of Unit				Heating Water			
				Water			
				Sewer			
				Trash Collection			
Number of Bedrooms				<b>Total</b>		<b>\$</b>	

**Impact Analysis & Implementation:** The new rent reform will increase the rent share for residents and participants. As of August 2018, 79% of non-elderly and non-disabled public housing residents and 58% of housing choice voucher participants are paying at least the minimum rent of \$225. The OHA anticipates a slight increase in rent for those already paying, at least, the minimum rent due to the elimination of household deductions. Residents and participants not already paying the minimum rent will shoulder most of the impact, as the average minimum rent will increase by an average of at least 38% for public housing and 106% for HCV.

The OHA foresees fully implementing the new rent policy over a period of three (3) years. New rents will be calculated at the full triennial recertification for each resident and participant beginning in April 2019. Through this course of action, the OHA will be able to accurately track who is scheduled for the rent change and when. Once approved by HUD, the OHA will notify residents and participants prior to their recertification of the new policy and when they should expect the rent change.

PH/HCV	FY2020	FY2021	FY2022
Recertification & Rent Reform Implementation	<b>Group 3</b> <i>1/3 of Entire Population</i>	<b>Group 1</b> <i>1/3 of Entire Population</i>	<b>Group 2</b> <i>1/3 of Entire Population</i>
Annual Online Update	<b>Group 1 &amp; Group 2</b>	<b>Group 2 &amp; Group 3</b>	<b>Group 1 &amp; Group 3</b>

An unintended consequence of the rent reform is residents and/or participants not being able to afford the \$225 rent. A solution to this issue is the OHA MTW Resource Center, which provides self-sufficiency services including, but not limited to, case management, needs assessments, employability counseling, and job referral/placement assistance services for a maximum of two years.

**Numerical analysis:** The analysis below reflects the non-elderly and non-disabled residents and participants currently not paying at least \$225 in minimum rent and how the proposed rent reform will impact the overall revenue for the OHA if those residents and participants pay just the \$225 minimum rent; other rent reform considerations are not taken into account.

Category	Not paying \$225 in rent	Average current rent share	Average increase in rent to meet \$225 minimum	Average increase in monthly rent to OHA	Average increase in yearly rent to OHA	Average loss to OHA if minimum rent is not implemented
Public Housing	97	\$163	\$62	\$6,014	\$72,168	(\$72,168)
HCV	408	\$109	\$116	\$47,328	\$567,936	(\$567,936)
<b>Total</b>	<b>505</b>	<b>\$136</b>	<b>\$178</b>	<b>\$53,342</b>	<b>\$640,104</b>	<b>(640,104)</b>

These figures represent a snapshot of the possible positive impact the proposed rent reform could have on the OHA. As deduced from the analysis, these new measures will push the residents and participants towards self-sufficiency, while granting the OHA the needed funds to operate. It is in the best interest of the OHA, the residents, and the participants to go forward with the new rent policy.

**Cost/Benefit Analysis:** After the first implementation year (2020), only the first 1/3 of residents and participants will have transitioned onto the new policy. The OHA will take that opportunity to assess the process, the hardships, the fiscal impacts, the challenges, the capacity of the MTW Resource Center, bottlenecks, and other issues possibly inherent in the new policy. From there changes will be made, if necessary.

## **Activity 9: Establishment of Agency-Wide \$100 Minimum Rent**

Approval and Implementation Year: Activity 9 was first approved and implemented in FY2016.

Description: In FY2016, the OHA utilized the MTW flexibilities to establish a minimum rent that exceeds \$50 for both public housing and the housing choice voucher program. The OHA established an agency-wide minimum rent of \$100. Agency-wide programs will include public housing, tenant-based rental assistance vouchers and project-based vouchers. In FY2016, the OHA received approval to apply the \$100 minimum rent agency-wide including SHA, FUP, NED, Port-ins, and VASH<sup>1</sup> vouchers. The households shall pay rent of at least \$100 after the provision of utility allowances. The OHA requested a modification of this activity, which was approved by HUD. These flexibilities are now applicable to its Single Room Occupancy (SRO) voucher participants.

Status: Partially implemented.

Planned Non-Significant Changes: None.

Planned Changes to Metrics/Data Collection: The OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Planned Significant Changes: Currently, the OHA has a minimum rent \$100 which is applicable to all heads of household except non-elderly and non-disabled residents and participants, VASH, Tenant Based Rental Assistance (Non-MTW), Tenant Based Rental Assistance (Activity 10), and Antioch Manor (Non-MTW) participants. Rent is calculated from all income sources, deductions and utility allowances are given, and then the rent is reached, which must be at least \$100.

\$100 will continue to be the minimum rent for all residents and participants (except for those aforementioned) along with elderly and/or disabled heads of household and spouses/co-heads with fixed monthly income. Rent will be calculated from all income sources. All household deductions will be eliminated (elderly/disabled, dependent, medical, childcare, earned income disallowance, and adult/full time student wages) from the rent calculation. A standard utility allowance will be given for both public housing and HCV (an example is attached in the appendix). Lastly, hardship rent will be fixed at \$50.

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<sup>1</sup> The OHA MTW FY 2016 Plan states that the minimum rent for VASH participants will be \$100. Upon further consideration, in its FY2017, OHA decided to revert to a policy it established June 1, 2012 by resolution to have VASH participants with income pay a minimum rent of fifty dollars (\$50.00) and VASH participants with zero income pay zero dollars (\$0.00). By resolution, this policy will also apply to participants in OHA's Homelessness Prevention Program.

The table below summarizes the proposed rent reform changes.

Applies to All Households Authority-Wide (Excluded households are listed below)		
	Current OHA Rent Structure	Proposed OHA Rent Structure
<b>I</b>	\$100 minimum rent	\$100 minimum rent
<b>II</b>	\$100 minimum rent calculated from all income sources	\$100 minimum rent calculated from all income sources
<b>III</b>	\$100 minimum rent applicable to all heads of household except: <ul style="list-style-type: none"> <li>i. Non-elderly &amp; non-disabled residents &amp; participants</li> <li>ii. VASH</li> <li>iii. Tenant Based Rental Assistance (Non-MTW)</li> <li>iv. Tenant Based Rental Assistance (Activity 10)</li> <li>v. Antioch (Non-MTW)</li> </ul>	\$100 minimum rent applicable to heads of household including elderly and/or disabled heads of household and spouses/co-heads with fixed monthly income. Excludes the following: <ul style="list-style-type: none"> <li>i. Non-elderly &amp; non-disabled residents &amp; participants</li> <li>ii. VASH</li> <li>iii. Tenant Based Rental Assistance (Non-MTW)</li> <li>iv. Tenant Based Rental Assistance (Activity 10)</li> <li>v. Antioch (Non-MTW)</li> </ul>
<b>IV</b>	Rent is based on 30% of adjusted annual income	Rent is based on 30% of annual income
<b>V</b>	Assets to be used in rent calculations: <ul style="list-style-type: none"> <li>i. Banking (Savings &amp; Checking)</li> <li>ii. Assets over \$25,000</li> <li>iii. Life Insurance policies</li> <li>iv. Real Estate</li> </ul>	Assets to be used in rent calculations: <ul style="list-style-type: none"> <li>i. Banking (Savings &amp; Checking)</li> <li>ii. Assets over \$25,000</li> <li>iii. Life Insurance policies</li> <li>iv. Real Estate</li> </ul>
<b>VI</b>	Deductions allowed: <ul style="list-style-type: none"> <li>i. Elderly/Disabled</li> <li>ii. Dependent</li> <li>iii. Medical</li> <li>iv. Childcare</li> <li>v. Earned Income Disallowance (EID)</li> <li>vi. Adult/Full-Time Student Wages</li> </ul>	No household deductions
<b>VII</b>	Utility allowance: <ul style="list-style-type: none"> <li>i. Public Housing – Separate, based on community</li> <li>ii. HCV – Separate, based on dwelling type</li> </ul>	One standardized utility allowance for public housing and one for HCV.
<b>VIII</b>	Hardship rent: Varies case by case	Hardship rent: \$50

<b>\$100 Minimum Rent Calculation Examples</b>				
Applies to All Households Authority-Wide				
	Current OHA Rent Structure		Proposed OHA Rent Structure	
	<b>\$100 Minimum Rent</b>		<b>\$100 Minimum Rent</b>	
	Amount	Math	Amount	Math
<b>Annual Income</b>	\$15,000		\$15,000	
<b>Deductions</b>	(\$8,000)		(\$0)	
<b>Adjusted Annual Income</b>	\$7,000	$(\$15,000 - \$8,000 = \$7,000)$	\$15,000	$(\$15,000 - \$0 = \$15,000)$
<b>Yearly Rent</b> <i>(Based on 30% of Adjusted Annual Income)</i>	\$2,100	$(\$7,000 * 0.30 = \$2,100)$	\$4,500	$(\$15,000 * 0.30 = \$4,500)$
<b>Total Tenant Payment (TTP)</b>	\$175	$(\$2,100 / 12 = \$175)$	\$375	$(\$4,500 / 12 = \$375)$
<b>Utility Allowance</b> <i>(Based on 1 Bedroom)</i>	(\$88)		(\$88)	
<b>Rent</b> <i>(Based on Calculations)</i>	\$87	$(\$175 - 88 = \$87)$	\$287	$(\$375 - 88 = \$287)$
<b>\$100 Minimum Rent</b>	<b>\$100</b>		<b>\$287</b>	$(\$375 - 88 = \$287)$

In this example, the current rent structure yields a monthly rent of \$100; the proposed rent structure yields a monthly rent of \$287. The elimination of deductions results in an increase of revenue for the OHA of \$187 monthly and \$2,244 yearly. Although, it increases the rent share for the resident/participant, as well, the new rent is still well below the fair market rent in Orlando. Under the proposed rent structure, the resident/participant would pay 23% of yearly gross income towards rent; whereas, under the current rent structure, only 8% of gross income would go towards rent.

A random sampling of OHA resident and participant rents were compared utilizing both the current and proposed rent structures. Under the new proposed rent structure, the average rent increased by \$13 or 7% for public housing, and decreased by \$28 or 14% for HCV.

Standardized Utility Allowance

To ensure uniformity, while conforming to HUD regulations, utilities will be assessed and reviewed annually. Once the utility rates are provided, by an outside contractor, the OHA will review the rates and do an average of the costs to apply to each utility by bedroom size for both the HCV and public housing programs.

Below are estimates of the new standard utility allowances based on the basic average costs from the 2018 utility rates that the OHA is currently using for both the HCV and public housing programs.

<b>Public Housing 2019 Standard Utility Allowance (Units without Water &amp; Sewer)</b>				
<b>Unit Type</b>	<b>Average Monthly Gas</b>	<b>Average Monthly Electric</b>	<b>Water &amp; Sewer</b>	<b>Total Monthly Allowance</b>
0 Bedroom	\$33	\$53	\$0	<b>\$86</b>
1 Bedroom	\$37	\$51	\$0	<b>\$88</b>
2 Bedroom	\$39	\$51	\$0	<b>\$90</b>
3 Bedroom	\$47	\$59	\$0	<b>\$106</b>
4 Bedroom	\$54	\$70	\$0	<b>\$124</b>
5 Bedroom	\$65	\$52	\$0	<b>\$117</b>
6 Bedroom	\$77	\$74	\$0	<b>\$151</b>

<b>Public Housing 2019 Standard Utility Allowance (Units with Water &amp; Sewer)</b>				
<b>Unit Type</b>	<b>Average Monthly Gas</b>	<b>Average Monthly Electric</b>	<b>Water &amp; Sewer</b>	<b>Total Monthly Allowance</b>
1 Bedroom	\$37	\$51	\$49	<b>\$137</b>
2 Bedroom	\$39	\$51	\$51	<b>\$141</b>
3 Bedroom	\$47	\$59	\$52	<b>\$158</b>
4 Bedroom	\$54	\$70	\$61	<b>\$185</b>

HCV 2019 Standard Utility Allowance							
Locality: Orange County, Florida		Unit Type: All			Date: 1/1/2019		
Utility or Service	Monthly Dollar Allowances; Number of Bedrooms						
	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
<b>Heating</b> <i>(Includes Natural Gas, Electric Resistance, Heat Pump, &amp; LPG/Propane)</i>	\$4	\$6	\$7	\$8	\$11	\$13	\$15
<b>Cooking</b> <i>(Includes Natural Gas, Electric Resistance, &amp; LPG/Propane)</i>	\$10	\$14	\$17	\$20	\$23	\$26	\$29
<b>Other Electric/Lighting</b>	\$29	\$40	\$50	\$61	\$71	\$81	\$90
<b>Air Conditioning</b>	\$9	\$20	\$33	\$43	\$65	\$80	\$89
<b>Water Heating</b> <i>(Includes Natural Gas, Electric, &amp; LPG/Propane)</i>	\$15	\$30	\$46	\$61	\$76	\$92	\$91
<b>Water</b> <i>(Includes Orlando, Winter Park, Apopka, &amp; Winter Garden)</i>	\$10	\$11	\$14	\$17	\$18	\$28	\$31
<b>Sewer</b> <i>(Includes Orlando, Winter Park, Apopka, &amp; Winter Garden)</i>	\$19	\$23	\$30	\$40	\$50	\$58	\$64
<b>Trash</b> <i>(Includes Orlando, Winter Park, Apopka, &amp; Winter Garden)</i>	\$19	\$19	\$19	\$19	\$19	\$19	\$19
<b>Actual Family Allowances</b> <i>To be used by the family to compute allowance.</i>				<b>Utility or Service</b>		<b>Per month Cost</b>	
Complete below for the actual unit rented.				Heating		\$	
Name of Family				Cooking			
				Other Electric			
				Air Conditioning			
				Heating Water			
Address of Unit				Water			
				Sewer			
				Trash Collection			
				<b>Total</b>		<b>\$</b>	
Number of Bedrooms							

**Impact Analysis & Implementation:** The OHA does not predict a significant impact on the residents and participants for this new policy; however, it may increase the rent share for some residents and participants. As of August 2018, all of MTW public housing residents were paying at least the minimum rent of \$100, and only 6% of MTW housing choice voucher participants were not paying at least the minimum rent of \$100. For those households with elderly and/or disabled heads of household and spouses/co-heads on a fixed monthly income, a \$100 minimum rent is a viable solution.

An unintended consequence of the rent reform is residents and/or participants not being able to afford the \$100 rent. A solution to this issue is the OHA MTW Resource Center, which provides self-sufficiency services including, but not limited to, case management, needs assessments, employability counseling, and job referral/placement assistance services for a maximum of two years.



**SECTION IV**  
**APPROVED ACTIVITIES:**  
**HUD APPROVAL PREVIOUSLY**  
**GRANTED**

## SECTION IV - APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

### A. Implemented Activities

#### Activity 2: Streamline the Recertification Process in the Public Housing and Housing Choice Voucher Programs

Approval & Implementation Year: Activity 2, in its current form, was approved in FY2015 (November 2014). The phased-in implementation began in FY2015.

Description: Streamline the recertification process in the public housing and housing choice voucher programs by conducting recertification of all residents and participants every three years (triennial). This means that every three years, residents and participants will come into the office to conduct the traditional recertification with the exception of a modified 3<sup>rd</sup> party verification and \$25,000 asset disregard.

The streamlined recertification began in 2015. The OHA recertified one third of all residents and participants in FY2015, one-third in FY2016, and the last one-third in 2017. In 2018, the OHA will recertify another one-third of its residents and participants. Thereafter, the OHA proposes to implement this activity by recertifying one third (1/3) of its full population each year.

In its FY2016 MTW Plan, the OHA received HUD approval to apply all aspects of this activity to NED, FUP, VASH and SHA vouchers. In FY2017, the OHA sought to modify this activity to add its Single Room Occupancy (SRO) voucher program, which was approved. The OHA applied this change in FY2018.

Due to the extended recertification period, the OHA has created a local form 9886, Authorization for Release of Information. The local form captures the same information as the HUD form 9886 except that the resident/participant's consent for release of information will be extended from 15 months to 36 months as needed to update the resident/participant's data between each triennial recertification.

#### *OHA Annual Online Updates*

In the years when residents and participants do not have their scheduled recertification, they will have an annual online update. The OHA will use this as an opportunity to conduct an audit to review the household composition, tax return, and criminal background check. During the annual online update, the OHA will recalculate rent in the following circumstances:

1. If the total tenant payment (TTP) increases or decreases by \$100 or more
2. If the family size/household composition changes in such that a person with new income is added to the household
3. Hardships
4. Criminal background checks leading to termination
5. Reasonable Accommodations

### TRIENNIAL IMPLEMENTATION SCHEDULE

PH/HCV	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	FY2021	FY2022
Recertification	Group 1 1/3 Entire Population	Group 2 1/3 Entire Population	Group 3 1/3 Entire Population	Group 1 1/3 Entire Population	Group 2 1/3 Entire Population	Group 3 1/3 Entire Population	Group 1 1/3 Entire Population	Group 2 1/3 Entire Population
Annual Online Update	None	Group 1 and Group 3	Group 1 and Group 2	Group 2 and Group 3	Group 1 and Group 3	Group 1 and Group 2	Group 2 and Group 3	Group 1 and Group 3

*OHA Elimination of Interim Recertifications*

The OHA will continue to streamline the recertification process by eliminating interim recertification completely except for hardships, audits (including criminal background checks, change in family size/ household composition<sup>2</sup>), and reasonable accommodations for all residents and participants.

*Flat Rent*

The OHA public housing residents are granted the ability to choose the Flat Rent Option twice per year rather than annually.

Status: Triennial recertifications are underway for both HCV and public housing. The HCV program now offers participants the option to go online or call to schedule an appointment with an eligibility specialist. Public Housing plans to offer residents the option to schedule appointments online or by phone but currently utilizes the traditional method of issuing appointment dates and times by mail. The OHA has added its Single Room Occupancy (SRO) voucher program to this activity.

The triennial reexaminations groups are as follows:

<b><u>GROUP</u></b>	<b><u>RESIDENT/PARTICIPANT CATEGORY</u></b>
Group 1	Elderly/disabled residents/participants
Group 2	Residents/participants with anniversary dates between April 1- September 30
Group 3	Residents/participants with anniversary dates between October 1- March 31

The OHA has implemented annual online updates, which allows residents and participants to verify household composition, income and assets online. The updates include resident/participant submission of a personal declaration form, verification of IRS tax filing, and other documents. For residents and participants without computer access, the OHA provides computers at two locations.

In FY2018, the OHA implemented a recertification unit, whereby the OHA employees are cross-trained to administer both public housing and HCV recertifications.

Planned Non-Significant Changes: The triennial schedule will remain the same; however, elderly and disabled residents/participants with fixed incomes and flat rents will have a triennial reexamination only. They will not be subject to the annual online update.

Planned Changes to Metrics/Data Collection: The OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Planned Significant Changes: None.

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<sup>2</sup> The OHA MTW FY2015 Plan states that interims would be eliminated completely except for...decreases in family size...Upon further consideration, OHA decided to revert to its previous practice of conducting interims when there is a change in family size/household composition.

**Activity 6: Provide up to 50 One and Two Bedroom Units and Supportive Services at West Oaks Apartments for up to 24 Months for Homeless Individuals**

Approval & Implementation Year: Activity 6 was first approved in FY2012. The phased-in implementation began in September 2013.

Description: The OHA seeks to provide up to 50 project-based vouchers for one and two bedroom units at West Oaks Apartments without a competitive process. This transitional housing will be available to agencies that commit to provide supportive services to homeless individuals for up to 24 months.

Status: Implemented. HUD has approved all 50 project-based vouchers to be used in coordination with homeless service providers. At the end of FY2018, 66 vouchers have been or were in use on a rotating basis.

Planned Non-Significant Changes: None.

Planned Changes to Metrics/Data Collection: OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Planned Significant Changes: None.

**Activity 8: Project-Based Vouchers in OHA Owned Units**

Approval & Implementation Year: Activity 8 was first approved and the phased-in implementation began in FY2016.

Description: The OHA will project-base up to 20% or 538 of its available tenant based section 8 vouchers at OHA owned units. HUD approved MTW flexibilities to allow the OHA to implement this activity without engaging in a competitive process. The OHA was also granted approval to conduct its own inspections and rent reasonableness functions.

The OHA will implement its project-based voucher program at Jackson Court, Division Oaks, and West Oaks which are approved sites for the project-based voucher program. The vouchers at West Oaks will be in addition to the PBV vouchers discussed in Activity 6 (transitional housing for the homeless). Additionally, the OHA will build 41 (forty-one) homes on the undeveloped lots west of Westmoreland Drive at Carver Park. Five (5) of those homes will be sold through the OHA at market rate, and the remaining 36 (thirty-six) homes will be project-base voucher rentals.

Status: Partially implemented. At the end of FY2018, 72 PBVs have been or were in use on a rotating basis at Jackson Court, Division Oaks, and West Oaks. The OHA has yet to start development at Carver Park for the 36 PBVs.

Planned Non-Significant Changes: None.

Planned Changes to Metrics/Data Collection: The OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Planned Significant Changes: None.

**Activity 10: Tenant-Based Voucher Homelessness Prevention Program**Approval & Implementation Year:

Description: OHA and the City of Orlando are partnering to administer a voucher program to address chronic homelessness as a part of the 25 Cities Initiatives. The Orlando Veteran's Affairs Medical Center is also a participant. Chronic homelessness is defined as adults with a disabling condition who have been continuously homeless for at least one year or have had four episodes of homelessness in the past three years. The disabling condition(s) limits an individual's ability to work or perform one or more activities of daily living and is defined as a diagnosable substance use disorder, serious mental illness, developmental disability or chronic physical illness.

In this activity, OHA will provide vouchers and the City of Orlando will provide services for approximately 150 chronically homeless persons identified by the City of Orlando. Depending on funding availability, the City of Orlando will provide approximately \$4,000 in services annually per household served. The City of Orlando funding will be used to provide an estimated 10 case managers to handle an average of 15 clients per case manager. The City of Orlando will refer the chronically homeless persons under case management to OHA. Once confirmed eligible, these referrals will bypass the section 8 wait list and other eligibility criteria.

OHA will also partner with other agencies that can provide supportive services to increase OHA's ability to house the chronically homeless.

Status: Implemented. At the end of FY2018, 12 participants received vouchers and 14 participants cumulatively over the life this activity.

Planned Non-Significant Changes: None.

Planned Changes to Metrics/Data Collection: OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Planned Significant Changes: None.

B. Not Yet Implemented

**Activity 11: Project-Based Homeownership Program**

Approval & Implementation Year: Activity 11 was first approved in FY2018. The phased-in implementation has yet to begin as planning is still underway.

Description: The Orlando Housing Authority is implementing a Section 8 Project-Based Homeownership Program, over a ten (10) year period, beginning with the 82 homeownership units that have not been developed at Carver Park.

The OHA has partnered with the City of Orlando and other stakeholders to construct 82 homes at Carver Park. The site will be mixed-income: a number of homes sold will be affordable and a number of homes will be sold at market rate. OHA will provide monthly homeownership assistance to some or all of the affordable buyers and also provide the value of the improved land and impact fee credits, if available from the City of Orlando. Below is the chart detailing the proposed plan.

<b>CARVER PARK HOMEOWNERSHIP</b>					
<b>Residential Type</b>	<b>#Bed/Bath</b>	<b># of units</b>	<b>Affordable</b>	<b>Market Rate</b>	<b>Avg. House SF</b>
Single family	4/2	3	1	2	1,569
Single family*	3/2	8	3	5	1,342
*Townhome (38) or ** Duplex (14)	3/2	52	16	36	1,250
Rowhouse (10 units/bldg-2 bldgs)	2/2	<u>20</u>	<u>10</u>	<u>10</u>	1,150
Sub-total		83	30	53	
* Completed Model Home		<u>-1</u>			
<b>Total</b>		<b>82</b>			
* Townhome w/garage 6-7 units /bldg ** Duplex - 2 units per building					

Carver Park homeownership opportunities will be offered to the following eligible households:

1. Households that relocated from Carver Court as a part of the Uniform Relocation Act
2. Current OHA public housing/Section 8 participants
3. Applicants on the OHA public housing and Section 8 waiting lists
4. Households currently living in the Parramore area
5. Eligible OHA Employees - Excludes staff involved in the decision making process and contractors/subcontractors that have any direct or indirect interest (24 CFR 982.161) in accordance with the general procurement standards (2 CFR 200.318)

While a preference for homeownership placement will be given to the abovementioned households, the OHA will consider other low-income households that are not on the wait list but are ready for homeownership, in order to fulfill its commitment to the Carver Park Community. Additionally, the OHA may partner with The Orlando Chapter of the Urban League to gain access other qualified low-income households.

Status: The City of Orlando (City) and the OHA shared the cost of a market study for the Carver Park homeownership phase. The OHA and the City will use the results from the study to develop the Carver homeownership strategy, including but not limited to, the process, program administration, waitlist management, unit pricing, timeline, and the amount of OHA funds to be dedicated to this activity. Concrete plans have not been solidified, as the OHA is still in discussion with the City of Orlando.

The OHA intends to partner with the City of Orlando Community Reinvestment Authority (CRA) to complete the homeownership phase of the HOPE VI development east of Westmoreland Avenue. The OHA and CRA are negotiating a Memorandum of Understanding (MOU) which sets forth the general parameters for a formal agreement between the parties. The scope of the MOU covers the construction and development of 41 homeownership units at Carver Park located within the downtown Orlando Community Redevelopment Area (east of Westmoreland Drive). Those units will be sold at affordable and market rates. The OHA will provide homeownership counseling to the affordable rate participants and possibly PBVs in the form of mortgage subsidy or down payment assistance. The OHA will build 41 (forty-one) homes on the undeveloped lots west of Westmoreland Drive. Five (5) of those homes will be sold through the OHA at market rate, and the remaining 36 (thirty-six) homes will be project-base voucher rentals.

Timeline: None as of yet.

Planned Non-Significant Changes: None.

Planned Significant Changes: None.

### **Activity 13: Streamlined Public Housing Inspections**

Approval & Implementation Year: Activity 13 was first approved in FY2019. The phased-in implementation has yet to begin.

Description: The OHA will streamline inspections by conducting public housing unit inspections, by tenant, every three years (triennial) in tandem with triennial recertifications. Triennial inspections will replace annual inspections, and the OHA will provide strategic preventive maintenance at all properties throughout each year. Randomly selected units will be chosen, from the 2/3 of public housing populace that will not receive the triennial inspection that fiscal year, for inspection. Those inspections will include building exterior/systems and common areas at all public housing properties. When tenants move out, the OHA will continue to conduct inspections those units. Also, the OHA will continue to comply with all REAC inspections and conduct 100% pre-REAC inspections at each selected site annually.

Status: The OHA just received approval for this activity in September 2018 and is currently working on the implementation.

Planned Non-Significant Changes: None.

Planned Changes to Metrics/Data Collection: OHA does not anticipate changes to the metrics, baselines, or benchmarks during the plan year.

Planned Significant Changes: None.

C. On Hold  
No activities.



D. Closed Out Activities

**Activity 3: Streamline the Rent Calculation Process in the Public Housing & Housing Choice Voucher Programs**

Approval and Implementation Year: Activity 3 was first approved in FY2012. Implementation of Activity 3 began in FY 2013.

Reason for Closing Out Activity: OHA combined activities 2 and 3. See section IV: Approved Activities.

Year Activity was Closed Out: FY 2015.

There are no HUD Metrics for this activity because this activity did not reach the data collection phase.

**Activity 4: Consolidation of Inspection and Recertification Requirements to Establish an Inspection Process Based on Geographic Location**

Approval and Implementation Year: Activity 4 was first approved in FY2012. Implementation of Activity 4 began in FY2013 with the inspection process based on geographic location.

Reason for Closing Out Activity: A key part of Activity 4 was to have a unified public housing and voucher inspection mechanism based on HQS standards. Activity 4 was closed out because HUD will continue to undertake UPCS public housing REAC inspections, thereby effectively causing the OHA also to use UPCS inspections for public housing. The OHA's basing of the inspection process on geographic location has been discontinued because inspection by geographic location was no longer efficient when the HQS standards could not be used for both public housing and section 8.

Year Activity was Closed Out: FY2014.

See FY2013 Report for the last activity 3 metrics.

**Activity 5: Supporting up to 50 Homeowners for Six (6) Months Each by Providing Interim Financial Assistance (vouchers) and Counseling to Prevent Foreclosures**

Approval & Implementation Year: Activity 5 was first approved in FY2012. The phased-in implementation began in FY2014.

Reason for Closing Out Activity: The climate for homeowners facing foreclosure has changed significantly from 2009, when this activity was first proposed. The OHA has identified a huge challenge in finding homeowners that will be "made whole" by providing six (6) months of financial assistance. Program revisions to provide a lump sum payment to the lender on behalf of an eligible program approved applicant to bring their mortgage loan current and move forward were not successful. The current households that meet the eligibility requirement all need more money than the voucher program will offer.

Year Activity was Closed Out: FY2015.

See FY2014 Report for the last activity 5 metrics.

**Activity 7: Use of Project-Based Vouchers and Other Resources to Develop Low-Income City Donated Property for Low-Income Elderly Housing, in Conjunction with the Redevelopment of Jackson Court/Division Oaks**

Approval and Implementation Year: Activity 7 was first approved in FY2012.

Reason for Closing Out Activity: Activity 7 was closed out as it did not move beyond its planning stages. OHA and the City of Orlando unsuccessfully attempted to find land and funding for the redevelopment of Jackson Court/Division Oaks. Although OHA executed a Memorandum of Understanding with the Carver Theatre Developers (CTD), CTD's inability to procure loans for construction financing prevented the activity from moving forward.

Year Activity was Closed Out: FY2014.

**Activity 12: Tenant-Based Rental Assistance Program**

Approval and Implementation Year: Activity 12 was first approved and implemented in FY2018.

Reason for Closing Out Activity: This activity was a program in which the OHA would provide funds for the first month's rent for homeless households and then receive a reimbursement from the City of Orlando. The OHA conducted a cost benefit analysis of this activity and concluded that the administrative burden of continuing this activity far outweighed the benefit to the community. The financial and human resources allocated to this activity could be better utilized elsewhere.

Year Activity was Closed Out: FY2018.

There are no HUD Metrics for this activity.

# **SECTION V**

## **SOURCES AND USES OF FUNDS**

## SECTION V - Sources and uses of funds\*

### A. Sources and Uses of Funds

Estimated Sources of MTW Funding for the Fiscal Year		
<b>Sources</b>		
<b>FDS Line Item</b>	<b>FDS Line Item Name</b>	<b>Dollar Amount</b>
70500 (70300+70400)	Total Tenant Revenue	\$4,834,902
70600	HUD PHA Operating Grants	\$27,088,812
70610	Capital Grants	\$1,825,285
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$342,220
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$2,468,290
<b>70000</b>	<b>Total Revenue</b>	<b>\$36,559,509</b>

Estimated Uses of MTW Funding for the Fiscal Year		
<b>Uses</b>		
<b>FDS Line Item</b>	<b>FDS Line Item Name</b>	<b>Dollar Amount</b>
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$3,782,743
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$5,457,353
92500 (92100+92200+92300+92400)	Total Tenant Services	\$427,818
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$1,082,637
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary maintenance	\$4,701,830
95000 (95100+95200+95300+94500)	Total Protective Services	\$689,830
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$398,754
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expense	\$431,155
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$352,934
97100+97200	Total Extraordinary Maintenance	\$0

97300+97350	Housing Assistance Payment + HAP Portability-In	\$19,234,455
97400	Depreciation Expense	\$1,867,352
97500+97600+97700+97800	All Other Expenses	\$0
<b>90000</b>	<b>Total Expenses</b>	<b>38,426,861</b>

\*Line 97400 is a non-cash expense. Once removed, OHA's total expenses are \$36,559,509

**General**

OHA plans to address much needed health and safety issues in public housing. OHA will expend capital funds to address mold, mildew, and termite issues as well as modernizing elevators. The termite infestation will be addressed at Griffin Park, and the mold/mildew issues will be addressed at every property. OHA will address other safety issues across its Asset Management properties. OHA also plans to continue making site improvements at each of the OHA sites.

While OHA will shift some funds to address the health and safety issues above, OHA anticipates using approximately \$500,000 Capital Funds in FY2020 to retrofit units to meet VCA/ADA/UFAS requirements at many of its properties.

**Describe the Activities that Will Use Only MTW Single Fund Flexibility**

In addition to the activities described above, OHA continues to use the MTW Single Fund Flexibility to support Uses of Funds A.

**Use of Funds A: Comprehensive One-Stop Self-Sufficiency Resource Center**

Use of Funds Action A is to provide a Comprehensive One-Stop Self-Sufficiency Resource Center. The MTW Resource Center is linked to MTW Activity 1 – Phase in the implementation of a self-sufficiency rent floor of \$225 for households which are not elderly and not disabled. The implementation of the rent floor includes a referral to the MTW Resource Center for non-elderly and non-disabled households not paying \$225 at the time the rent floor is implemented. For the first five years, only public housing residents were referred to the Resource Center. In FY2019, the OHA phased-in its non-elderly and non-disabled housing voucher program participants that are not paying the rent floor of \$225. This will continue in FY2020. The implementation of the \$225 rent floor provides hardship exceptions linked to self sufficiency activities conducted at the MTW Resource Center.

The MTW Resource Center provides self sufficiency services, including but not limited to, case management, needs assessments, employability counseling, and job referral/placement assistance services for a maximum of two years for each adult referred. Use of a computer lab, transportation (bus passes) and child care assistance is provided to help participants secure and maintain employment. The OHA monitors the progress of households subject to the rent floor relative to accomplishing the goals identified in their self sufficiency plan until self-sufficiency is reached.

In the past, the MTW Resource Center has partnered with a number of agencies to provide services to residents referred to the Resource Center. The Resource Center plans to continue to develop and foster relationships that will help the OHA's residents and participants become more self-sufficient.

The MTW Resource Center will continue to establish relationships with employers to facilitate job referrals and consequently strengthen and/or build economic self-sufficiency for the OHA participants and residents. In addition, the Resource Center will extend its partnership with CareerSource (formerly Work Force Center Florida) to bring employability workshops to the Ivey Lane Homes site using its mobile unit.

OHA estimates \$805,000 to be expensed for this endeavor.

**Foreseeable Usage of Single Fund Flexibility for RAD at Reeves Terrace, The Villas at Hampton Park, and Ivey Lane Developments.**

The OHA received approval to submit an application to convert the units at Lorna Doone Apartments in March of 2015. Based on that approval, the OHA submitted a RAD application for Lorna Doone in March 2016. HUD issued a RAD CHAP (Commitment to Enter into a Housing Assistance Payment) for Lorna Doone in April of 2018. The OHA has decided not to pursue a RAD conversion at Lorna Doone.

The OHA submitted another RAD Portfolio application, which included Reeves Terrace [The Villas at Hampton Park is included in the Asset Management Project (AMP) with Reeves Terrace], Ivey Lane, Lake Mann, Griffin Park, The Villas at Carver Park, and The Landings at Carver Park to HUD in January 2018. In May of 2018, HUD issued a RAD CHAP (Commitment to Enter into a Housing Assistance Payment) for the RAD conversion at 4 of those 6 properties: Reeves Terrace, Ivey Lane, Lake Mann, and Griffin Park.

The RAD conversion of Reeves Terrace, The Villas at Hampton Park, and Ivey Lane will allow for the repair or replacement of some major systems, improvements to configuration of common spaces, unit rehabilitation, improvements and upgrades, Section 504 unit, site, and common area improvements, mixed income housing, site reconfiguration, infrastructure improvements, and redevelopment. The OHA has decided not to pursue a RAD conversion at Lake Mann or Griffin Park.

The OHA projects, in the future, expending MTW block grant funds to supplement RAD project-based voucher rents at the Lorna Doone, Reeves Terrace, The Villas at Hampton Park, Ivey Lane, Lake Mann, and Griffin Park developments in the first full year and possible escalations in future years. These RAD conversions are in the early stages, and more information, as well as projected funds, will be provided as the process develops.

B. MTW Plan: Local Asset Management Plan

Local Asset Management Plan	
<b>Is the PHA allocating costs within statute?</b>	No
<b>Is the PHA implementing a local asset management plan (LAMP)?</b>	Yes
<b>Has the PHA provided a LAMP in the appendix?</b>	Yes
<b>If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year</b>	OHA does not plan to make any changes in the Plan Year

C. Rental Assistance Demonstration (RAD) Participation

**Rental Assistance Demonstration (RAD) Participation**

A RAD Significant Amendment for Reeves Terrace, The Villas at Hampton Park, Ivey Lane, Lake Mann, and Griffin Park was submitted to HUD in the OHA MTW FY2019 Annual Plan.

**Has the MTW PHA submitted a RAD Significant Amendment in the appendix?**

**No**

**If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment or describe any proposed changes from the prior RAD Significant Amendment**

N/A

# SECTION VI

## ADMINISTRATIVE



## **SECTION VI - ADMINISTRATIVE**

- A. Resolution signed by the Board of Commissioners adopting the Annual MTW Plan Certification of Compliance (includes Certificates of Consistency)
  - 1) Certificates of Consistency – Orange County
  - 2) Certificate of Consistency – City of Orlando

**APPROVAL AND AUTHORIZATION TO SUBMIT THE ORLANDO HOUSING AUTHORITY'S MOVING TO WORK YEAR 9 PLAN COVERING THE PERIOD APRIL 1, 2019 THROUGH MARCH 31, 2020 TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

**WHEREAS**, The Orlando Housing Authority's (OHA) mission is to offer a choice of safe and affordable housing options and opportunities for economic independence for residents of Orlando and Orange County, and

**WHEREAS**, the Moving to Work (MTW) demonstration program supports the Orlando Housing Authority's mission and the Orlando Housing Authority has been designated as a MTW agency, and


**WHEREAS**, The Orlando Housing Authority prepared its Moving To Work (MTW) year-8 Plan covering the period April 1, 2019 through March 31, 2020, and

**WHEREAS**, the Plan was available for public comment for at least thirty (30) days, and there were no less than fifteen (15) days between the public hearing and the approval of the Plan by the Board of Commissioners in order to incorporate any public comments into the Annual MTW Year-9 Plan, and

**WHEREAS**, the Orlando Housing Authority did not receive any public comments about the program design, and

**WHEREAS**, THE Orlando Housing Authority's Moving to Work year 9 Plan is incorporated by reference into this Resolution.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of the Housing Authority of the City of Orlando, Florida, approves and authorizes the President/CEO to submit the Orlando Housing Authority' Moving To Work Year-9 Plan covering the period April 1, 2019 through March 31, 2020 to the U. S. Department of Housing and Urban Development and authorizes the President/CEO to execute all necessary agreements and to make changes that are not substantial.



**VIVIAN BRYANT, ESQ.**  
**PRESIDENT/CEO**



**ED CARSON**  
**CHAIR**

**November 8, 2018**

Date

**AUTHORIZATION TO REVISE THE MOVING TO WORK ANNUAL PLAN FOR THE PERIOD  
APRIL 1, 2019 THROUGH MARCH 31, 2020 TO INCLUDE INTENTIONS TO DEMOLISH  
IVEY LANE HOMES, REEVES TERRACE APARTMENTS, LORNA DOONE APARTMENTS,  
AND MURCHISON TERRACE APARTMENTS**

**WHEREAS**, the Orlando Housing Authority's (OHA) mission is to offer a choice of safe and affordable housing options and opportunities for economic independence for residents of Orlando and Orange County, Florida, and

**WHEREAS**, the Moving to Work (MTW) demonstration program supports the Orlando Housing Authority's mission and OHA has been designated an MTW Agency, and

**WHEREAS**, the Orlando Housing Authority prepared and submitted its Year 9 Moving To Work (MTW) Plan covering the period from April 1, 2019 through March 31, 2020, to the United States Department of Housing and Urban Development (HUD) January 10, 2019, and

**WHEREAS**, the OHA seeks to revise its Year 9 Moving to Work (MTW) Plan to include the demolition of Ivey Lane Homes, Reeves Terrace Apartments, Lorna Doone Apartments, and Murchison Terrace Apartments, and

**WHEREAS**, in an era of tight funding and an aging housing stock, the OHA must implement multiple strategies to continue to further its mission, to offer safe and affordable housing options and opportunities for economic independence for residents of Orlando and Orange County, and

**WHEREAS**, the Orlando Housing Authority seeks to demolish four of its public housing complexes, Ivey Lane Homes, 181 units, built in 1971; Reeves Terrace, 171 units, built in 1942; Lorna Doone Apartments, 104 units, built in 1970; and Murchison Terrace, 190 units, built in 1952, and

**WHEREAS**, the proposed update to the Moving to Work (MTW) Year 9 Plan was made available for review and public comment between February 18, 2019 and March 21, 2019 and advertised in the Orlando Sentinel, The Orlando Times, La Prensa, and The Sanford Herald and posted at the Orlando Housing Authority Administration Office at 390 North Bumby Avenue, Orlando, Florida and at the OHA's Lake Mary Office at 510 West Lake Mary Boulevard, Sanford, FL, and

**WHEREAS**, the Orlando Housing Authority held a public hearing on March 21, 2019 for comments on the updates to the Year 9 Moving to Work (MTW) Plan, and

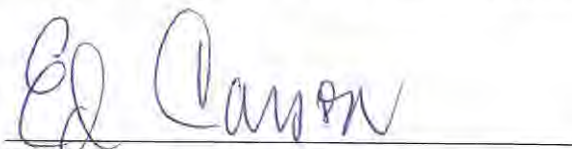
**WHEREAS**, the Orlando Housing Authority received three (3) comments at the public hearing, and

**WHEREAS**, the comments and OHA responses are incorporated into the Moving to Work Plan update.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of the Housing Authority of City of Orlando, Florida Authorizes the President/CEO to revise the Moving to Work Annual Plan for the period April 1, 2019 through March 31, 2020 to include intentions to demolish Ivey Lane Homes, Reeves Terrace Apartments, Lorna Doone Apartments, and Murchison Terrace Apartments and authorizes the President/CEO to execute agreements and to make changes that are not substantial.



**VIVIAN BRYANT, ESQ.**  
**PRESIDENT/CEO**



**ED CARSON**  
**CHAIR**

## CERTIFICATIONS OF COMPLIANCE

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

#### Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/04/2019), hereinafter referred to as "the Plan", of which this document is a part and I make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

**Orlando Housing Authority**  
**MTW PHA NAME**

**FL004**  
**MTW PHA NUMBER/HA CODE**

*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).*

**Ed Carson**  
**NAME OF AUTHORIZED OFFICIAL**

**Chair**  
**TITLE**



**SIGNATURE**

**March 21, 2019**  
**DATE**

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

# Certification of Consistency with the Consolidated Plan

U.S. Department of Housing  
and Urban Development

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

Applicant Name: Housing Authority of the City of Orlando, Florida

Project Name: FY 2020 Moving to Work (MTW) Plan

Location of the Project: Orlando, FL, Orange County

Name of the Federal  
Program to which the  
applicant is applying: n/a

Name of  
Certifying Jurisdiction: Orange County, Florida

Certifying Official  
of the Jurisdiction  
Name: Mitchell L. Glasser 

Title: Division Manager, Housing and Community Development

Signature: \_\_\_\_\_

Date: 11/08/2018

# Certification of Consistency with the Consolidated Plan

U.S. Department of Housing  
and Urban Development

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

Applicant Name: Housing Authority of the City of Orlando, Florida

Project Name: FY 2020 Moving to Work (MTW) Plan

Location of the Project: Orlando, FL, Orange County

Name of the Federal  
Program to which the  
applicant is applying: n/a

Name of  
Certifying Jurisdiction: City of Orlando, Florida

Certifying Official  
of the Jurisdiction  
Name: Oren J. Henry

Title: Director, City of Orlando Housing & Community Development Dept

Signature: 

Date: 11/20/2018

**B. Public Comment Period**

The MTW Plan was made available for public review beginning Monday, September 17, 2018 through Thursday, October 18, 2018. The Public Hearing was held at 2:00 pm on Thursday, October 18, 2018 at the OHA Administration Office, 390 N. Bumby Avenue, Orlando, Florida 32803. Twenty-eight (28) people attended the public hearing.

The OHA notified residents and the local community about the date and time of the public hearing by placing ads in English in the Orlando Sentinel, Sanford Herald, La Prensa (Spanish), and the Orlando Times. During the comment period, copies of the draft FY2020 MTW Plan were made available at the OHA Administrative Office and the OHA Lake Mary Office. The OHA also posted the draft FY2020 Plan on its website to elicit comments from residents and the local community. The OHA did not receive any comments for the FY2020 MTW Annual Plan.

Pursuant to HUD procedures, the OHA modified its submitted FY2020 MTW Annual Plan to include demolition intentions at Lorna Doone Apartments, Ivey Lane Homes, Reeves Terrace, and Murchison Terrace. The OHA updated and reissued its FY2020 MTW Plan for public review beginning on Monday, February 18, 2019 through Thursday, March 21, 2019. The Public Hearing was held at 2:00 pm on Thursday, March 21, 2019 at the OHA Administration Office, 390 N. Bumby Avenue, Orlando, Florida 32803. Thirty-four (34) people attended the public hearing. The Orlando Housing Authority received three (3) public comments.

The OHA notified residents and the local community about the date and time of the second public hearing by placing ads in English in the Orlando Sentinel, Sanford Herald, La Prensa (Spanish), and the Orlando Times. During the comment period, copies of the reissued FY2020 MTW Plan were made available at the OHA Administrative Office and the OHA Lake Mary Office.

Comment #	Individual / Organization	Comment	OHA Response
1	Commissioner Patty Sheehan	I am concerned about Reeves Terrace, its residents, and the Reeves community as a whole, whom are in my district. The demolition of Reeves Terrace results in a loss of affordable housing in my district. Redevelopment primarily benefits the wealthy not low-income residents. I am advocating for a viable balanced option overall for the rehab/redevelopment of Reeves Terrace. I do not want to be an impediment, but affordable housing is not replaced at the same rate as it's demolished.	Thank you for your comment regarding Reeves Terrace. The OHA understand your position, as we, too, are concerned about the well being and safety of OHA residents and overall community at Reeves Terrace. The OHA is working with all stakeholders on how to best address the obsolescence at Reeves Terrace. The physical needs assessment will determine whether rehab is a viable option for Reeves Terrace. The intention is to rebuild the Reeves Terrace community while honoring the OHA's commitment to affordable housing.
2	Commissioner Regina Hill	I am concerned about affordable housing in my district, primarily Griffin Park. If OHA demolishes Griffin park, where would the residents go? The voucher system doesn't work for low-income people. Families would be displaced. Reconsider demolition of Griffin Park in the Parramore area. Rehabbing Griffin versus demolishing Griffin is a better option. Gentrification would ensue and my office will	Thank you for your comment regarding Griffin Park. The OHA recognizes your apprehension. The OHA puts its residents first and foremost, and the obsolescence at Griffin Park demands that viable actions be taken by the OHA expediently. Residents will be responsibly relocated until redevelopment is complete, and



		fight OHA on the demolition of Griffin Park.	residents will be allowed to return, pending all prerequisites are met. Additionally, every effort will be taken to preserve the history of the Parramore community. The OHA is working with all stakeholders on how to best address the circumstances at Griffin Park and the entire Parramore area. The intention is to rebuild the Parramore community while honoring the OHA's commitment to affordable housing.
3	Oren J Henry, The City of Orlando	The City of Orlando is not against the OHA's plans to demolish, but asks that certain measures be taken as to not displace residents, and that the OHA provides scheduled strategic plans (which includes demo, redevelopment, and relocating) that are staggered and doesn't disrupt the housing market or the Orlando community. We want to know how OHA's demo plans affect the community and its stakeholders, and we want to work closely with the OHA throughout this process.	Thank you for your comment. The OHA is looking forward to its continued work with The City. The measures requested, by The City, are reasonable, and the OHA is in agreement with them. Plans are now being fashioned with the consideration of all stakeholders, and will be shared as the process takes shape.

C. Evaluations of Demonstration Period

The OHA would benefit most from an evaluation that covers a larger scope of implemented MTW activities; however, OHA will need more time to determine whether the metrics that have been chosen are effective in evaluating the activities. Therefore, an evaluation at this time does not seem prudent in FY2020.

D. Lobbying Disclosures

# Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Applicant Name

Orlando Housing Authority

Program/Activity Receiving Federal Grant Funding

Public Housing

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

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

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

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

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

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.  
**Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Vivian Bryant, Esq.

Title

President/CEO

Signature



Date (mm/dd/yyyy)

3/20/2019

Previous edition is obsolete

Orlando Housing Authority

form HUD 50071 (01/14)

ref. Handbooks 7417.1, 7475.1, 7485.1, & 7485.3

# SECTION VII

## APPENDIX

## SECTION VII – APPENDIX

### Local Asset Management Program

As part of the Orlando Housing Authority's Amended and Restated Moving to Work Agreement, effective January 7, 2011, OHA has designed and implemented its Local Asset Management Program. The OHA is going to continue to implement its local asset management program for its Public Housing Program and describe such program in its Annual MTW Plan. The term "Public Housing Program" means the operation of properties owned or subsidized by the Agency that are required by the U.S. Housing Act of 1937. The Agency's local asset management program includes a description of how it's implementing project-based property management, budgeting, accounting, and financial management and any deviations from HUD's asset management requirements. The OHA describes its cost accounting plan (cost allocation plan) as part of its local asset management program.

The OHA maintains a project-based management approach which includes both the OHA-managed properties and its privately managed properties, under the Public Housing Program. Project-level budgeting and accounting is maintained for each of these Public Housing properties. In addition, mixed-finance rental community that contains Agency-assisted units under the Public Housing Program are owned, managed and operated by third party partnerships.

The OHA has developed its program to ensure that accounting and financial reporting methods comply with 2 CFR Part 200, Subpart E regarding cost allocations, 2 CFR Part 200, Subpart F regarding audit requirements, and generally accepted accounting practices (GAAP).

OHA's Public Housing Program's local asset management plan applies the following principles related to program costs:

- Costs incurred are deemed reasonable and consistent with the amended Moving to Work Agreement.
  - Costs shall be accorded consistent treatment.
  - Costs shall be determined in accordance with GAAP.
  - Costs are adequately documented.
  - OHA will report results according to HUD MTW guidelines.
- 1) Budgeting and accounting - Operating budgets are developed and maintained annually at the property level. The groupings of like properties in a geographic location are called Asset Management Properties (AMPs). The related accounting activities are maintained at that level as well.
  - 2) Financial management - Financial reporting and analysis is performed and monitored on a monthly basis, at the property level. Financial reporting requirements are in accordance with the amended Moving to Work Agreement as well as 2 CFR Part 200, Subpart E.
  - 3) Cost Allocation Approach - OHA's Amended and Restated Moving to Work Agreement identifies either a "cost allocation" or "fee-for-service" option. OHA utilizes the cost allocation method. OHA is in keeping with 24 CFR 990 and uses property level management, accounting, and budgeting and has established a Central Office Cost Center (COCC). The costs of the COCC are allocated not only to Public Housing, but to the other programs managed by OHA

All direct and indirect costs are charged to the AMPs in accordance with 2 CFR Part 200, Subpart E. A cost may be direct with respect to some specific service or function, but indirect with respect to the final cost objective. Direct costs associated with project activities are allocated to the specific properties receiving the benefit of the expenditure. Direct and indirect costs associated with the COCC are allocated on a reasonable basis and, if allocated to public housing properties, are substantially done using a project unit distribution basis.

The OHA has developed this program to ensure that accounting and financial reporting methods comply with 2 CFR Part 200, Subpart E regarding cost allocations, 2 CFR Part 200, Subpart F regarding audit requirements, and generally accepted accounting practices (GAAP).

### **Cost Allocation Plan**

Under the MTW Agreement, the cost accounting options available to the Agency include either a “cost allocation” or “fee-for-service” methodology. The OHA approached its cost allocation plan with consideration to the entire operation of the Agency including the MTW Program. This cost allocation plan addresses the larger OHA operation as well as the specific information related to the MTW Program.

### **Difference**

The OHA has the ability to define direct costs differently than the standard definitions published in HUD’s Financial Management Guidebook pertaining to the implementation of 24 CFR Part 990.

The OHA is required to describe any differences between the Agency’s Local Asset Management Program and HUD’s asset management requirements in its Annual MTW Plan in order to facilitate the recording of actual property costs and submission of such cost information to HUD.

The OHA determined to implement a cost allocation system that allocates COCC costs to all agency-wide programs. HUD’s Asset Management System focuses primarily on allocating costs to the Asset Management Properties (AMPs) and necessarily to other programs. This Cost Allocation Plan addresses the entire the OHA operation.