

FY2022 MOVING TO WORK ANNUAL PLAN

**Submitted January 15, 2021
Orlando Housing Authority Executive Office
April 1, 2021 through March 31, 2022**

THE ORLANDO HOUSING AUTHORITY

FY2022 Moving to Work (MTW) Annual Plan

April 1, 2021 – March 31, 2022

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SECTION I

INTRODUCTION

SECTION I – INTRODUCTION

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

MTW Activities

As a MTW agency, the OHA is allowed to modify certain requirements 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 implementing the current MTW activities and uses of funds. One goal of the OHA is to reposition the OHA housing stock by demolishing the Lake Mann, Griffin Park, Ivey Lane, Reeves Terrace, Murchison Terrace, and Lorna Doone developments. The OHA has submitted applications 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.

All activities and uses of funds are discussed, in detail, in the plan. In FY2022, the OHA is not proposing any new activities to the U.S. Department of Housing and Urban Development's (HUD) for approval.

Activity 1: \$225 Minimum Rent for Non-Elderly and Non-Disabled Households. The OHA modified this activity, in FY2020, from a \$225 rent floor to a \$225 minimum rent and added a minimum work requirement. Additional rent reform measures were proposed to simplify rent calculations, increase revenue for the OHA, and encourage self-sufficiency amongst the residents and participants. These new measures were implemented fall 2019.

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.

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

Activity 9: Establishment of an Agency-Wide \$100 Minimum Rent. 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. Other rent reform measures were proposed, in FY2020, to simplify rent calculations and increase revenue for the OHA. These new measures were implemented fall 2019.

Activity 10: Tenant-Based Voucher Homelessness Prevention Program has been implemented and progress is being made.

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 allows 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 MTW objectives.

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 to the Orlando Housing Authority Special Purpose Vouchers in the Sanford jurisdiction. The OHA is now able to apply these flexibilities to its Single Room Occupancy (SRO) program, as well.

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 continue implementing the project-based voucher (PBV) activity at OHA owned sites. The OHA will also continue to manage its properties and to seek opportunities to increase its housing portfolio, so that additional affordable housing options are available to the community. In addition, the OHA is committed to improving the quality of housing 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 and Seminole Counties. 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

The OHA received approval from HUD for a Rental Assistance Demonstration (RAD) Portfolio Award for the Citrus Square public housing site in March 2015; Citrus Square Apartments is the only OHA RAD property. Although, the OHA applied for and was awarded HUD RAD applications at other OHA properties, the OHA decided not to pursue RAD conversions at any of its approved 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. 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) in March 2015.

The Citrus Square RAD Conversion closed on December 28, 2017. Ovation Housing LLLP owns Citrus Square, and Stephenson and Moore, Inc. manage the property. As of March 2020, the occupancy rate is 100%.

Sanford Housing Authority (SHA)

The OHA continues to manage the Sanford Housing Authority (SHA). The goals and objectives for the SHA are to redevelop its former public housing sites. In FY2019, The OHA and SHA broke ground on the new Georgetown Square in Sanford. Construction should be completed sometime during FY2021. Additionally, the OHA and the SHA will continue looking at other opportunities that 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
N/A			

0

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	Leased	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	12	Committed and Leased	No	Activity 6: Transitional Housing 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	Committed and Leased	No	Activity 8: PBVs in OHA Owned Units 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	Committed and Leased	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.
Pendana at West Lake (Phase II)	24	Committed	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	28	Committed	No	The OHA manages the Sanford Housing Authority's (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	Committed	No	The OHA will build 41 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 homes will be project-base voucher rentals.

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

All data is as of June 2020.

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 January 13, 2020, HUD issued a Letter of Closure on the Section 3 VCA. Further monitoring is no longer required although OHA will continue to fully comply with applicable requirements.

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

The OHA plans to reposition six of its properties: Griffin Park, Lake Mann, Lorna Doone, Murchison Terrace, Ivey Lane, and Reeves Terrace. This will entail demolition, relocation of the residents, and the redevelopment of the properties. The OHA plans to continue to address its health and safety needs at its public housing sites.

The OHA will continue to use Capital Funds in FY2022 to retrofit units to meet VCA/ADA/UFAS requirements at many of its properties.

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	16,452	1,371*
MTW Housing Choice Voucher (HCV) Units Utilized	28,716	2,481
Local, Non-Traditional: Tenant-Based	120	10
Local, Non-Traditional: Property-Based	1,044	0
Local, Non-Traditional: Homeownership	0	0

*1458 – 87 = 1371 (Original baseline minus removed public housing units from Citrus Square Apartments)

Planned Households Served

46,332

3,862

Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number of Units Months Occupied/Leased	Planned Number of Households to be Served
Tenant-Based	Homelessness Prevention Program (Activity 10)	120	10
Property-Based	Jackson Court/Division Oaks/West Oaks (Activity 8)	900	75
Property-Based	West Oaks (Activity 6)	144	12
Homeownership		0	0

Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing	
Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Public Housing	The OHA is repositioning a significant portion of its public housing stock. This process will take a number of years. Once the OHA receives SAC approval for demolition, residents will only be leased up at sites that are not scheduled for repositioning. Public housing units, at sites scheduled for demolition, may be held as a result. The OHA's public housing lease rates may decline.
Housing Choice Voucher (HCV)	<p>Funding is a potential issue for the HCV program. Funding levels from HUD have continued to be below the amount needed to fund the program. The OHA may not have enough administrative support to comply with HUD's leasing requirements. The OHA has increased the flexibility of its HCV occupancy standards to be the same as public housing's minimum and maximum number of persons per bedroom for all bedroom sizes as a remedy to some of its leasing challenges.</p> <p>Finding owners willing to rent to HCV participants is another issue. The OHA will offer increased payment standards (up to 120% of the Fair Market Rent) for disabled participants who are having difficulty finding units within the regular payment standard. The OHA is currently looking to employ a Landlord Outreach Specialist to assist finding HCV owners who will rent to OHA clients.</p>

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	13,016	Open	Yes
MTW Housing Choice Voucher	Community Wide	5,814	Closed	No
MTW Public Housing Units	Site-Based*	897	Closed	No

*This includes Carver Park Villas & Carver Park Landings
This data is as of March 2020.

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

PROPOSED ACTIVITIES

SECTION III – PROPOSED MTW ACTIVITIES

The OHA is not proposing any new activities for the FY2022.

SECTION IV

APPROVED ACTIVITIES:

HUD APPROVAL PREVIOUSLY

GRANTED

SECTION IV - APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

A. Implemented 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. Activity 1 was reformed, re-proposed, and approved in FY2020. The phased-in implementation began in FY2020.

Description: The OHA implemented a self-sufficiency rent floor of \$225 for public housing and HCV households that are not elderly and not disabled. A referral to the MTW Resource Center, for these households not paying the minimum \$225 rent floor, was also implemented. The implementation of the \$225 rent floor provides hardship exceptions linked to self-sufficiency activities. 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 childcare 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.

In FY2020, the OHA re-proposed Activity 1. The OHA modified the activity from a \$225 rent floor to a \$225 minimum rent and added a minimum work requirement. Additional rent reform measures, such as the elimination of all household deductions and a standard utility allowance based on bedroom size, were also added to simplify rent calculations, increase revenue for the OHA, and encourage self-sufficiency amongst the residents and participants.

Status: Partially implemented. This new rent policy will be fully implemented over a period of three (3) years. New rents will be calculated at the full triennial recertification of each resident and participant beginning in the fall of 2019.

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 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: The OHA is streamlining the recertification process in the public housing and HCV 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 3rd 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 recertified another one-third of its residents and participants. Thereafter, the OHA will continue implementing 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 OHA Special Purpose 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

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 composition¹), 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. 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.

¹ 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.

Status: Implemented. 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 schedule remains the same.

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.

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 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 is providing 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 FY2020, 79 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 is implementing 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: Implemented. At the end of FY2020, 78 PBVs have been or were in use on a rotating basis at Jackson Court and Division Oaks, and the OHA has yet to start development at Carver Park for the 36 PBVs. Although this activity contemplates that the OHA will develop new properties and/or acquire existing properties in which certain units will qualify for PBV, no additional properties are anticipated for this activity in FY2022.

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

Approval and Implementation Year: Activity 9 was first approved and implemented in FY2016. Activity 9 was reformed, re-proposed, and approved in FY2020. The phased-in implementation began in FY2020.

Description: The OHA utilized its MTW flexibilities to establish a minimum rent that exceeds \$50 for both the public housing and HCV programs. The OHA established an agency-wide minimum rent of \$100 for public housing, HCV, TBRA, PBV, OHA Special Purpose vouchers, FUP, NED, Port-ins, and SRO. Each household shall pay rent of at least \$100 after the provision of utility allowances.

Only VASH participants and homeless participants of the OHA Homelessness Prevention Program (Activity 10) are exempt from the \$100 minimum rent. Participants with income pay a minimum rent of fifty dollars (\$50.00), and participants with zero income pay zero dollars (\$0.00).

In FY2020, the OHA received approval to further augment the \$100 minimum rent. To simplify rent calculations and increase revenue for the OHA, all household deductions were eliminated and each household is given a standard utility allowance based on bedroom size.

Status: Partially implemented. This new rent policy will be fully implemented over a period of three (3) years. New rents will be calculated at the full triennial recertification of each resident and participant beginning in the fall of 2019.

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: Activity 10 was first approved and the phased-in implementation began in FY2016.

Description: The 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 is providing 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 FY2020, 10 participants had received vouchers and 34 participants, cumulatively, have been assisted over the life of 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, with up to 82 homeownership units to be 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. Below is the chart detailing the proposed plan.

CARVER PARK HOMEOWNERSHIP					
<u>Residential Type</u>	<u>#Bed/Bath</u>	<u># of units</u>	<u>Affordable</u>	<u>Market Rate</u>	<u>Avg. House SF</u>
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>			
Total		82			
* 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 (timeframe TBD)
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 OHA will partner with the City of Orlando Community Redevelopment Agency to construct 41 homes at Carver Park east of Westmoreland Avenue.

In November 2018, the OHA executed a Memorandum of Understanding (MOU) with the City of Orlando Community Reinvestment Authority (CRA) to complete the homeownership phase of the HOPE VI development east of Westmoreland Avenue. The MOU sets forth the general parameters for a formal agreement between the parties for construction and development of 41 homeownership units including between 13-19 homes affordable to low income purchasers. The OHA will provide homeownership counseling to the affordable homebuyers and may provide project-based vouchers (PBVs) in the form of mortgage subsidy or down payment assistance.

The OHA and CRA will negotiate a formal agreement for the completion of forty-one for sale homes east of Westmoreland Avenue. The OHA will build 41 (forty-one) units on the undeveloped lots west of Westmoreland Drive. Five (5) of those homes will be market rate homes for sale; the remaining 36 homes may be project-based 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 is streamlining 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: Not yet implemented. The OHA plans to phase-in implementation during FY2021.

Timeline: None as of yet.

Planned Non-Significant Changes: None.

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 would 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 would 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 had changed significantly from 2009, when this activity was first proposed. The OHA had 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 met the eligibility requirements needed more money than the voucher program could 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 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		
Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$4,311,620
70600	HUD PHA Operating Grants	\$31,510,650
70610	Capital Grants	\$578,990
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$600,860
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$3,530,600
70000	Total Revenue	\$40,532,720

Estimated Uses of MTW Funding for the Fiscal Year		
Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$3,498,430
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$6,699,950
92500 (92100+92200+92300+92400)	Total Tenant Services	\$445,720
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$1,182,130
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary maintenance	\$3,431,040
95000 (95100+95200+95300+94500)	Total Protective Services	\$621,650
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$539,490
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expense	\$416,040
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	Housing Assistance Payment + HAP Portability-In	\$23,698,270
97400	Depreciation Expense	\$938,590
97500+97600+97700+97800	All Other Expenses	\$0
90000	Total Expenses	\$41,471,310

*Line 97400 is a non-cash expense. Once removed, OHA's total expenses are \$40,532,720.

General

The OHA plans to reposition six of its properties: Griffin Park, Lake Mann, Lorna Doone, Murchison Terrace, Ivey Lane, and Reeves Terrace. This will entail demolition, relocation of the residents, and the redevelopment of the properties. The OHA plans to continue to address its health and safety needs at its public housing sites.

The OHA will continue to use Capital Funds in FY2022 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 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. This activity has been modified from a \$225 rent floor to a \$225 minimum rent for households that are not elderly and not disabled. The implementation of the minimum rent now includes a referral to the MTW Resource Center for non-elderly and non-disabled heads or co-heads of households that are not employed by April 1, 2020, not employed the minimum number of hours (28 hrs/wk or 20 hrs/wk if full-time student), or experiencing an employment related hardship.

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 childcare 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 \$896,100 to be expensed for this endeavor.

B. MTW Plan: Local Asset Management Plan

Local Asset Management Plan	
Is the PHA allocating costs within statute?	No
Is the PHA implementing a local asset management plan (LAMP)?	Yes
Has the PHA provided a LAMP in the appendix?	Yes
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	OHA does not plan to make any changes in the Plan Year

C. Rental Assistance Demonstration (RAD) Participation

Rental Assistance Demonstration (RAD) Participation
N/A

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 11 PLAN COVERING THE PERIOD APRIL 1, 2021 THROUGH MARCH 31, 2022 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 11 Plan covering the period April 1, 2021 through March 31, 2022, 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 11 Plan, and

WHEREAS, the Orlando Housing Authority received four (4) public comments about the program design, and

WHEREAS, the Orlando Housing Authority's Moving to Work year 11 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's Moving To Work Year 11 Plan covering the period April 1, 2021 through March 31, 2022 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 5, 2020
DATE

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 (04/01/2021), hereinafter referred to as "the Plan", of which this document is a part and 01 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


November 5, 2020
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.
Please clearly print the following information:)

ApplicantName: Housing Authority of the City of Orlando, FL (FL004)ProjectName: Moving to Work (MTW) Year 11 Plan FY 2022 (April 1, 2021 - March 31, 2022)Location of the Project: Orlando, FL , Orange County, FL

Name of the Federal
Program to which the
applicant is applying: N/AName of
Certifying Jurisdiction: Orange County, FloridaCertifying Official
of the Jurisdiction
Name: Mitchell GlasserTitle: ManagerSignature: Date: November 11, 2020

**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.
clearly print the following information:)

ApplicantName: Housing Authority of the City of Orlando, FL (FL004)

ProjectName: Moving to Work (MTW) Year 11 Plan FY 2022 (April 1, 2021 - March 31, 2022)

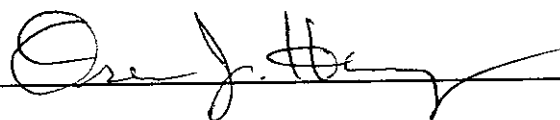
Location of the Project: Orlando, Florida and Orange County, Florida

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 HOUSING AND COMMUNITY DEV.

Signature: 

Date: 11/12/2020

B. Public Comment Period

The MTW Plan was made available for public review beginning Monday, September 14, 2020 through Thursday, October 15, 2020. The Public Hearing was held at 2:00 pm on Thursday, October 15, 2020 at the OHA Administration Office, 390 N. Bumby Avenue, Orlando, Florida 32803. Fourteen (14) people attended the public hearing. The Orlando Housing Authority received four (4) public comments regarding the MTW FY2022 Annual Plan.

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 FY2022 MTW Plan were made available at the OHA Administrative Office.

Comment #	Individual Organization	Comment	OHA Response
1	Marlene	<p>Hello, How does this program MTW work with people who have full vouchers moving to Orlando that pay 0 now for rent? I know how my agency pays for me there but how will this benefit the participant who pays 0 now? What happens when ones income is 100\$ a month? How does this program help families or individuals as myself by adding a additional 200\$ onto there portion of rent if they have any to pay themselves or not? What age is considered senior? I am hoping to move into a apartment by Jan 2021. I do want to join the public video in Oct. Thank you for your time.</p> <p>Hello, 28 hrs a week? I am in the process of waiting to hear back ss/dd if I finally will be getting this due to my disabilities. As of now my only income is 100\$ a month and I pay 0\$ for rent. Thank you for getting back to me.</p>	<p>Thank you for your comment.</p> <p>62 is considered a senior. If you are a current voucher holder and are looking to port into the OHA, if you are able-bodied, you will be required to pay at least \$225 in rent and you must work at least 28 hours. If you are a senior and/or disabled, you will be required to pay at least \$100 in rent. If you have \$0 income, you will be still be required to pay the minimum rent. The MTW program allows the OHA to make changes to our public housing and HCV programs to make our residents and participants more self-sufficient. Paying more than the minimum HUD rent of \$50 is one of those ways.</p>
2	Natasha Morris	<p>Hello, I would like to give a public about the moving to work program. I do not agree with Taking away credit from households with children especially children with disabilities. We are in a pandemic and a lot of children are home. Single parents with children with prior medical conditions are forced to pay for someone to come into the home and help with distant learning and watch over our children so they can work. Me having a child with autism it requires a lot of time and money. OHA want parents to work but how can we ever get ahead and get of the program if we can't even save to help towards a down payment for a home. I am almost forced to go get another job to pay for childcare. I want to further my education but after this big rent increase I need 2 jobs. I have been working the entire time that I have been on the program 5 years and every time I look up Something is changing. These decisions are hurting the working families. I honestly believe their should be some kind of exception when their is a disable child in the household the same way it is when the head of house hold is</p>	<p>Thank you for your comment. We will take this comment into consideration when creating programs aimed at our able-bodied population. Also, OHA has a Family Self-Sufficiency (FSS) program, of which you may be eligible to participate. FSS is a program that enables HUD-assisted families to increase their earned income and reduce their dependency on welfare assistance and rental subsidies.</p>

		disabled. Childcare is expensive and how can a single parent ever gain self-sufficiency if the childcare bill or medical expenses isn't taken into consideration for disable children that way they work toward homeowner ship or maybe they shouldn't count SSI income for disable children. Also, I would like them to find a way for lower income families to live in better neighborhoods so that our children can do to A rated schools. There also should be away that landlords should not be able to discriminate against voucher holders. There also should be a stricter policy in place for unemployment housing recipients. A lot of these changes never really affects the none working recipients it effects the working recipients. This should be a worldwide mandate. Not a OHA mandate. Self-sufficiency is something that is needed across the country. Thank u for your time & I pray my comment reaches the right hand.	
3	Martha Are, The Homeless Services Network of Central Florida	The administrative plan isn't available on the OHA website - so we can't reference specific language (says you have to go to their office to see the draft plan) - but we're going to ask them to tweak some wording to help us better use the 150 vouchers, and we're encouraging them to apply for the CARES vouchers - which HUD has encouraged PHAs to use in conjunction with the homeless system.	<p>Thank you for your comment.</p> <p>The Orlando Housing Authority's Section 8 Voucher and Mainstream programs are leased up and the waiting list is not open for new applicants. Even if we [OHA] tweaked the language for the 150 vouchers, the budget authority is not currently available.</p> <p>We plan to apply for the CARES Act 75 additional mainstream vouchers. We [OHA] can review the regulations to determine if that is an option. We [OHA] scheduled a meeting to discuss the CARES Act funding but could not coordinate all of the schedules.</p> <p>Orange County has the same programs as the Orlando Housing Authority. They may be able to [help].</p>
4	Bianca Bell	Good morning... it is with pleasure to agree upon the MTW plan for low income families.	Thank you for your comment.

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 FY2022.

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:

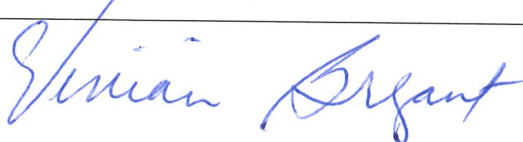
(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection 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)

11/5/2020

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.