

PHA Name : Ozark

PHA Code : AL073

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 4/1/2022

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Ozark Housing Community has identified the three goals of the Moving to Work Program Demonstration as its goals for participation in the program. These goals along with corresponding objectives and the initial activities we intend to implement to accomplish each goal are described below.

Goal 1 - Operational Efficiency through Innovation – Streamlining business processes and implementation of advanced technological solutions that will result in operational cost efficiencies and enable reallocation of resources to local initiatives and strategies.

Objectives

- a. Reduce current workloads of staff by simplifying routine transactional processes.
- b. Implement additional technology to ease administrative burden and reduce paperwork for standard operations.
- c. Utilize cost savings to support new initiatives designed under this plan.

MTW Activities

1. Local Rent Calculation Policies
2. Biennial Resident Re-certifications

Goal 2 - Self-Sufficiency – Providing alternate incentives designed to motivate families to actively seek financial independence and transition from dependency on housing subsidy. Carefully measure success of each incentive to identify and replicate the greatest motivators.

Objectives

- a. Engage families in self-improvement activities designed to meet their individual needs and goals.
- b. Adopt policies that mandate personal accountability and financial responsibility.
- c. Assess results and adjust incentives to provide continued motivation.

MTW Activities

1. Employment Requirement
2. Minimum Rents by Bedroom Size
3. Tiered Flat Rents

Goal 3 - Expand Housing Choice – Assess the need for additional types of low- and moderate-income housing in the local community such as work force housing, assisted living for elderly and disabled, homeless/near homeless families/individuals and emergency housing.

Objectives

- a. Continually upgrade hard units owned by OHC to include amenities commonly found in market rate housing.
- b. Limit portability to moves associated with work.
- c. Develop homeownership opportunities relevant to the local real estate market.
- d. Identify and/or develop emergency housing.

MTW Activities

1. Modified Definition of Elderly
2. Local Homeownership Program

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Plan to Implement in the Submission Year
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Plan to Implement in the Submission Year
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Currently Implementing
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Plan to Implement in the Submission Year
b. Work Requirement (HCV)	Plan to Implement in the Submission Year
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

C. MTW Activities Plan that Ozark Plans to Implement in the Submission Year or Is Currently Implementing

1.e. - Minimum Rent (PH)
The Ozark Housing Community plans to implement a minimum rent of \$130 for public housing households. Elderly and disabled households will be excluded from this activity The goal of the increased minimum rent is to reduce the number of "negative renters" and encourage those who are eligible to participate in work activities or work related training opportunities.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Increased revenue Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This will be the first year of implementation for this MTW activity. Therefore, there is no previous fiscal year for comparison.
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Ozark MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
minimum rent or minimum Total Tenant Payment (TTP) - \$130

1.m. - Utility Reimbursements (PH)
The utility reimbursement will be eliminated by capping the tenant payment at \$0.00. The goal of this activity is to eliminate "negative renters" and reduce the cost of operating the PH Program. By eliminating "negative renters" it is anticipated that residents will be encouraged to participate in work activity or work related training activity. For PH families only.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
This will be the first year for implementation, therefore, there is no previous fiscal year for comparison.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Ozark MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

10.a.HCV - Waive Operating a Required FSS Program (HCV)

The Ozark Housing Community will waive operating a required FSS Program that has been defunct for more than ten years. The goal of this activity is to remove the mandatory requirement to operate a FSS Program. By removing the mandatory requirement, the agency will have the opportunity to implement a voluntary FSS Program to assist program participants in asset building in the future.

This MTW activity serves the following statutory objectives:
Self-sufficiency

This MTW activity serves the following statutory objectives:
Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:
Currently assisted households only

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).
The MTW activity applies only to selected family types

The MTW activity applies to all tenant-based units

This is the first year of implementation and therefore, there is no previous year for comparison.

This MTW activity requires a Safe Harbor Waiver.
The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ozark MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

12.a. - Work Requirement (PH)

The work requirement will apply to all public housing household members age 19-61. Each family member ages 19-61 years of age is required to be employed a minimum of 15 hours per week (30 hours per week minimum for households with multiple eligible members) or meet a qualifying work activity. This activity will move participant families toward self sufficiency and financial independence thereby breaking the cycle of poverty and dependence on subsidies.

This MTW activity serves the following statutory objectives:
Self-sufficiency

This MTW activity serves the following statutory objectives:
Increased revenue

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).
The MTW activity applies only to selected family types

This will be the first year of implementation. Therefore, there is no previous fiscal year for comparison.

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

Attached Hardship policy applies to: }

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ozark MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:
The following counts as work under this activity: Being employed for a minimum of 15 hours per week, participating in documented work related job training/work readiness program and/or actively seeking employment through compliant job placement programs .
The following is how will the MTW agency monitor compliance: A resident services employee will provide case management services for affected participants and monitor compliance by partner agency reporting as well as through the current work verification procedures including third party, employer, EIV, etc.
The following supportive services are offered to support households: The agency will partner with a local community college to provide on site work related job training for affected participants who are not currently employed. The agency will also partner with job placement services and refer affected participants seeking employment for job placement assistance .
The following is how the agency address noncompliance with the work requirement policy: Participants not meeting exemption or hardship requirements failing to comply with the work requirement will be subject to termination of housing assistance after a six month notice . All currently regulated safe guards for termination will remain in place such as the right to cure and the grievance procedure.
63 households are currently subject to the policy.
0 households were sanctioned for non-compliance with the work requirement in the most recently completed PHA fiscal year.

12.b. - Work Requirement (HCV)
The work requirement will apply to all HCV participant household members age 19-61 years of age. Each family member ages 19-61 years of age is required to be employed a minimum of 15 hours per week (30 hours per week minimum for households with multiple eligible members) or meet a qualifying work activity. This activity will move participant families toward self sufficiency and financial independence thereby breaking the cycle of poverty and dependence on subsidies.
This MTW activity serves the following statutory objectives: Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
The MTW activity applies to all tenant-based units
The activity is only being implemented during the current year, therefore, there is no prior fiscal year for comparison.
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
Attached Hardship policy applies to: }
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Ozark MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:
The following counts as work under this activity: Being employed a minimum of fifteen hours per week, participating in a job training/work readiness program and/or seeking employment through a credible job placement program.
The following is how will the MTW agency monitor compliance: A resident services employee will provide case management services to the affected participants and monitor compliance through participation reports from partner agencies and the typical work verification procedures such as third party, employer, EIV, etc.

The following supportive services are offered to support households: The Ozark Housing Community will partner with a local community college to provide onsite work readiness /job training for affected participants. The agency will also partner with a credible job placement program to provide job placement services for affected participants seeking employment.

The following is how the agency address noncompliance with the work requirement policy: Noncompliant participants not meeting an exemption or hardship requirement will be subject to termination of housing assistance following a six month notice.

63 households are currently subject to the policy.

0 households were sanctioned for non-compliance with the work requirement in the most recently completed PHA fiscal year.

D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: Please see attached for Safe Harbor Waivers requested this year.

E.	Agency-Specific Waiver(s).
E.1	Agency-Specific Waiver(s) for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested. No Agency-Specific Waivers are being requested.
E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: MTW Agency does not have approved Agency-Specific Waivers

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$1,874,906	\$1,411,786	\$463,120	2021-12-31
2022	\$1,844,417	\$0	\$0	2022-12-31

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	Total Local, Non-Traditional Households	0

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

G.2	Establishing Reasonable Rent Policy.
MTW agency did not established a rent reform policy to encourage employment and self-sufficiency The agency plans to conduct a study and implement a rent policy based on 28% of the working family's income as well as modify the recertification process from annually to biennial to encourage work participation. The agency plans to implement this program with the start of the fiscal year on April 1, 2023.	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if Population Type is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family	

size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	0

H.	Public Comment
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Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

I.	Evaluations.
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No known evaluations.

Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

ATTACHMENT 2
Moving to Work Certifications of Compliance

CERTIFICATIONS OF COMPLIANCE

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

Certifications of Compliance with HUD and Federal Requirements and Regulations:
Board Resolution to Accompany Application to the Moving to Work Demonstration Program

Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the application to the Moving to Work Demonstration Program for the PHA and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the application and implementation thereof:

- (1) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure at least 75% of families assisted are very low-income as defined in Section 3(b)(2) of the 1937 Act throughout the PHA's participation in the MTW Demonstration Program.
- (2) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in establishing a reasonable rent policy that is designed to encourage employment and self-sufficiency.
- (3) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to assist substantially the same total number of eligible low-income families as would have been served absent MTW throughout the PHA's participation in the MTW Demonstration Program.
- (4) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program throughout the PHA's participation in the MTW Demonstration Program.
- (5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.
- (6) The PHA published a notice that a hearing would be held, that the application 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 application by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the application and invited public comment.
- (7) The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the application by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the application.
- (8) The PHA certifies that the Board of Commissioners 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).
- (9) The PHA must certify that it will carry out its application in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d-2000d-4), the Fair Housing Act (42 USC 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 USC 794), and title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.), regulations implementing these authorities, and other applicable Federal, State, and local civil rights law and that it will affirmatively further fair housing, which means that

it will take meaningful actions to further the goals identified by the Assessment of Fair Housing conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15, 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) and 903.15(d). Until such time as the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the 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 the PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions. The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2).

- (10) The application is consistent with the applicable Comprehensive Plan (or any plan incorporating such provisions of the Comprehensive Plan) for the jurisdiction in which the PHA is located.
- (11) The application contains a certification by the appropriate State or local officials that the application is consistent with the applicable Consolidated Plan, which incorporates a fair housing strategy that reflects the jurisdiction's Assessment of Fair Housing or Analysis of Impediments to Fair Housing Choice, as applicable, and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
- (12) The PHA affirmatively furthers fair housing. A PHA shall be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) Examines its programs or proposed programs; (ii) Identifies fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; (iii) Specifies actions and strategies designed to address contributing factors, related fair housing issues and goals in the applicable Assessment of Fair Housing (AFH) consistent with 24 CFR 5.154, in a reasonable manner in view of the resources available; (iv) Works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) Operates programs in a manner consistent consolidated plan under 24 CFR Part 91, and with any order or agreement, to comply with the authorities, specified in paragraph (o)(1) of this section; (vi) Complies with any contribution or consultation requirement with respect to any applicable Analysis of Fair Housing, in accordance with 24 CFR 5.150-5.180; (vii) Maintains records reflecting these analyses, actions, and the results of these actions; and (viii) Takes steps acceptable to HUD to remedy known fair housing and civil rights violations. PHAs that are not yet required to submit an AFH shall adhere to the requirements under 24 CFR 903.7(o) in effect prior to August 17, 2015.
- (13) The PHA complies with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (14) The PHA complies with the Architectural Barriers Act of 1968 and its implementing regulations at 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (15) The PHA complies 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.
- (16) The PHA complies with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (17) The PHA complies 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.
- (18) The PHA complies 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.
- (19) The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (20) The 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 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.
- (21) With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (22) The PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine

compliance with program requirements.

- (23) The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (24) The PHA will comply with the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards at 2 CFR Part 200.
- (25) The application and all attachments are available at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Ozark Housing Community

AL073

PHA NAME

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).

Dannie Walker

Secretary/Executive Director/CEO

NAME OF AUTHORIZED OFFICIAL*

TITLE



09/17/2020

SIGNATURE

DATE

*** Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the 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.**

Resident Meeting
January 4, 2022
Resident Comments

There were no resident comments obtained at the resident meeting held on January 4, 2022.

Impact Analysis for Minimum Rent

1. Impact on the agency's finances

The OHC will implement minimum rent of \$130. The goal is to decrease the number of negative renters, and encourage those eligible to participate in work related activities. This increase in minimum rent will have a positive impact on the agency's finances.

2. Impact on housing cost affordability

There will be not impact on public housing cost affordability. Fair market rent is and will be higher than public housing.

3. Impact on the waitlist

This activity will not affect the waiting list.

4. Impact on the termination rate

OHC does not anticipate an impact on termination rate due to hardship policy.

5. Impact on the agency's current occupancy level in public housing

OHC anticipates a minimal drop in occupancy.

6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice

Cost effectiveness: this activity will ensure the goal of cost effectiveness through encouraging participant to become self-sufficient.

Self-sufficiency: this activity will encourage eligible households to seek work related activities

7. Impact on the agency's ability to meet the MTW statutory requirements

The OHC will be able to meet all MTW statutory requirements.

8. Impact on the rate of hardship request and the number granted and denied as a result of an MTW activity

OHC anticipates a small increase in hardship request and granting hardship requests.

Due the hardship policy, OHC anticipates a minimal number of denied hardship request.

9. Impact across other factors above, on protected classes, including disparate impact

This activity will not have a negative impact on the protected classes

Minimum Rent Hardship Policy

A hardship exemption shall be granted to residents who can document that they are unable to pay the \$130 minimum rent because of a long-term hardship (over 90 days). Examples under which residents would qualify for the hardship exemption to the minimum rent would be limited to the following:

- The family has lost eligibility for or is applying for an eligibility determination for a Federal, State or local assistance program;
- The family would be evicted as result of the imposition of the minimum rent requirements;
- The income of the family has decreased because of changed circumstances, including loss of employment;
- A death in the family has occurred; or
- Other circumstances as determined by the HA

Impact Analysis for Work Requirement

1. Impact on the agency's finances

The OHC will implement a work requirement. The goal of this activity is to increase personal accountability and personal finance responsibility, which will have a positive impact on the agency's finances.

2. Impact on housing cost affordability

There will be no impact on housing cost affordability.

3. Impact on the waitlist

This activity will not affect the waiting list.

4. Impact on the termination rate

Due to the number of work-related activities participants and tenants can participate in, the OHC anticipates a minimal number of terminations.

5. Impact on the agency's current occupancy level in public housing

This activity is not anticipated to negatively affect the occupancy rate.

6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice

Cost effectiveness: this activity will ensure the goal of cost effectiveness through encouraging participant to become self-sufficient.

Self-sufficiency: this activity will encourage eligible households to seek work related activities.

7. Impact on the agency's ability to meet the MTW statutory requirements

The OHC will be able to meet MTW statutory requirements.

8. Impact on the rate of hardship request and the number granted and denied as a result of an MTW activity

OHC anticipates a small number of hardship request and few, if any, denials.

9. Impact across other factors above, on protected classes, including disparate impact

This activity will not have a negative impact on the protected classes.

Hardship for Work activities:

Work requirement will be suspended if the following occurs:

1. Applying for disability – activity will be suspended if:
 - A letter from disability lawyer stating the date of hearing
 - Doctor signed reasonable accommodation form
 - IF the tenant/participant is not awarded disability, they will be given 90 days to secure employment.
2. Medical situation with self, spouse, or child – activity will be suspended and reviewed as to whether the medical situation is temporary or permanent.

If job is lost due to termination or a voluntary reason:

3. The work requirement will be suspended for 90 days. During the 90 days, the tenant/participant/eligible household member will be directed to the Mary Hill Family Service Center to participate in preemployment services and MASTER classes. Tenants will also be referred to the Alabama Career Center.

If employment has not be secured before the 90 days, the work requirement will be suspended on a month-to-month basis. The tenant/participant/eligible household member will be asked to email the MTW department, once a month, with an update of their employment status and participation in employment classes.

The MTW department will mail a letter with an email appointment date. If the tenant/participant/eligible household member misses the date:

- 1st missed appointment; the tenant will be mailed a letter with another date to email the MTW Department.
- 2nd missed appointment; the tenant will be mailed a curable termination letter with another date to email the MTW Department.
- 3rd missed appointment – termination from the program.