



## **2017 MOVING TO WORK Annual Plan**

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# Portage Metropolitan Housing Authority

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## Table of Contents

	Page
Section I	Overview of Short-Term and Long-Term Goals..... 4
Section II	General Housing Authority Operating Information..... 6
Section III	Proposed MTW Activities.....10
Section IV	Approved MTW Activities.....10
	A. Implemented Activities.....10
	B. Not Yet Implemented Activities.....22
	C. Activities on Hold.....23
	D. Closed Out Activities.....24
Section V	Sources and Uses of Funds.....28
Section VI	Administration.....29
	Public Meetings.....29
	Public Hearing Agenda .....30
	Public Hearing Minutes .....32
	Public Hearing Attendance Record .....33
	Classified Advertisement (B).....34
	Additional Appendix Items.....34
	Planned or Ongoing Evaluations (C) .....35
	Capital Fund Program-Five Year Action Plan (D).....36
	Certification by Local Official of PHA Plans
	Consistency with the Consolidated Plan .....45
	Documentation of Public Notice as Published (B).....46
	Resolution Signed by Board Chairperson (A).....47
	Certifications of Compliance.....48



Input from residents at PMHA 2016 Resident Meetings indicate that low-wage jobs, job loss, and stagnant disability check amounts impact their ability to achieve self-sufficiency. As defined by residents, self-sufficiency is the ability to pay household bills and meet basic needs without assistance.

### **Short-Term Goals**

The Portage Metropolitan Housing Authority was one of the first high-performing housing authorities awarded Moving-To-Work status. Implementation of its MTW features began 1997. Since, PMHA fosters the opportunity to experiment and implement activities which encompasses the spirit of Moving to Work and are based in the three statutory goals:

1. Reduce cost and achieve greater cost effectiveness in federal expenditures
2. Create incentives for families to work, seek work, or prepare for work
3. Increase housing choices for low income families

Portage Metropolitan Housing Authority established the following MTW goals and objectives for 2017:

1. Achieve and Maintain Excellence in Tenant-Based Housing Programs
  - Four households will become new homeowners through the Housing Choice Voucher Homeownership Program in 2017.
2. Improve Productivity and Cost Effectiveness
  - Examine opportunities to improve productivity and cost effectiveness through technology.
  - Examine and revise PMHA's organizational chart to maximize employee productivity.
  - Recruit and staff vacant positions within a reasonable timeframe related to the nature of the position.
3. Collaborate with Community Partners to Leverage Resources to Benefit Households Assisted by PMHA and Portage County
  - PMHA will investigate opportunities to develop and manage permanent supportive housing.
  - PMHA will investigate methods of inter-agency cooperation that will lessen barriers to assistance for applicants and participants.

### **Long-Term Vision MTW Goals (Extending through the duration of the MTW Agreement)**

Portage Metropolitan Housing Authority seeks to develop itself as a top-quality real estate organization with the mission of:

- Integrating community services that will assist residents in continual economic improvement leading to either homeownership or private market housing.

- Providing decent, safe and affordable housing as a choice among elderly and disabled residents in order to promote aging in place and improvement in quality of life.

To accomplish the long-term vision PMHA will:

1. Streamline the delivery of housing through improvements in efficiency and effectiveness within its own resources offered by the Federal Government
2. Collaborate with community partners to leverage resources and strengths to improve housing and living conditions within Portage County
3. Develop a rent system that:
  - Is easier to administer and understand
  - Remains affordable to low-income households
  - Provides incentive for work
  - Removes systemic incentives for people to remain unemployed

## **Section II: General Housing Authority Operating Information**

**II.1.Plan.HousingStock**

**A. MTW Plan: Housing Stock Information**

Planned New Public Housing Units to be Added During the Fiscal Year											
AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
OH031000001 East Side	0	0	0	0	0	0	0	0	NA	0	0
OH031000002 West Side	0	0	1	1	0	0	0	2	General	1	2
<b>Total Public Housing Units to be Added</b>								<b>2</b>			
* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other											
If Other, please describe: <input type="text" value="NA"/>											
Planned Public Housing Units to be Removed During the Fiscal Year											
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed		Explanation for Removal								
OH031000001 East Side	0		NA								
OH031000002 West Side	0		NA								
<b>Total Number of Units to be Removed</b>	<b>0</b>										

The Portage Metropolitan Housing Authority has a total of 2 AMPS and lists both as references.

New Housing Choice Vouchers to be Project-Based During the Fiscal Year			
Property Name	Anticipated Number of New Vouchers to be Project-Based *	Description of Project	
Kent Transitional	10	Kent 1-bedroom units for youth with mental illness and/or substance abuse	
<b>Anticipated Total New Vouchers to be Project-Based</b>	<b>10</b>	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	<b>183</b>
		Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year	<b>153</b>

\*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.

Other Changes to the Housing Stock Anticipated During the Fiscal Year
During 2017, PMHA will explore potential purchases of 2 properties to replace the Willow Street units acquired by Kent State University. It will also convert Renaissance Place unit 101 from office space to resident housing.
It is anticipated that no units will be held off-line due to the relocation of residents during 2017.

General Description of All Planned Capital Fund Expenditures During the Plan Year
OH031000001-East AMP: Ravenna Woods: Foundation Repair-\$84,145 and Drainage-\$8,000; Etna House: Roof-\$35,592- Management Needs: \$126,666 for Advertising Bids & Architect Fee, Administration and Operations. OH031000002-West AMP: Heritage Knolls: Roofs-\$87,425-Management Needs: \$56,113 for Advertising Bids & Architect Fee, Administration and Operations.

**II.2.Plan.Leasing**

**B. MTW Plan: Leasing Information**

**Planned Number of Households Served at the End of the Fiscal Year**

MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased***
Federal MTW Public Housing Units to be Leased	283	3,398
Federal MTW Voucher (HCV) Units to be Utilized	1,562	18,745
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	8	96
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0
<b>Total Households Projected to be Served</b>	<b>1853</b>	<b>22239</b>

\* Calculated by dividing the planned number of unit months occupied/leased by 12.

\*\* In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.

\*\*\*Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

**Reporting Compliance with Statutory MTW Requirements**

If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.

Portage Metropolitan Housing Authority is and has been in compliance with all statutory MTW requirements in Section II(C) of the Standard MTW Agreement

**Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions**

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
NA	PMHA does not anticipate issues related to the leasing of Public Housing, Housing Choice Vouchers or non-traditional units.

**C. MTW Plan: Wait List Information**

**Wait List Information Projected for the Beginning of the Fiscal Year**

Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Housing Choice Vouchers-MTW	Community-Wide	0	Closed	YES
MTW Public Housing	Community-Wide	767	Open	Yes

Rows for additional waiting lists may be added, if needed.

\* *Select Housing Program* : Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

\*\* *Select Wait List Types* : Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

\*\*\* For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

Not Applicable

If Local, Non-Traditional Housing Program, please describe:

Not Applicable

If Other Wait List Type, please describe:

PMHA also operates a HUD-VASH voucher program in conjunction with the Veterans Administration. This program does not have a waiting list, but takes referrals from the VA as they arrive from the VA's "Interest List"

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

There are no anticipated changes to the organizational structure of the wait list or policy changes regarding the wait list.



**HCV-3      Initial rent burden cap from 70% to 50% of adjusted monthly income**

Original Plan Year: 1999    Original Implementation: 2000    Re-Implemented: 2017

PMHA offers HCV participants to utilize an initial rent burden of 50% as an effort to maximize housing choice and maintain a level of affordability.

During 2017, PMHA will implement the original MTW Initial rent burden cap of 50% of adjusted monthly income. The return to the initial 50% rent burden cap is due to the negative impact on Section 8 tenants. Difficulties with paying higher rent resulted in hardship and/or loss of housing for several tenants.

In 2014, the PMHA experimented with a rent burden cap of 70% of households' monthly income in an effort to assist in increasing housing choices for families who desired to use a greater share of income for housing.    Plan Year: 2014    Implementation: 2014

PMHA will return to the former metrics, baselines and benchmarks specified below:

<i>HC #5: Increase in Resident Mobility</i>			
Unit of Measurement	Baseline	Benchmark	Outcome
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number)	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number)	Actual increase of households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number)
	0	10 households or 10% of all households (whichever is greater)	

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

**HCV-4      Project-Based Voucher Program to assist non-profits and developers to increase housing choices for low-income households**

Plan Year: 1999

Implemented: 2002 with additional authorizations granted in 2009

PMHA operates a project-based voucher program under a different set of rules and regulations than those provided for under the standard HUD rules for project-based vouchers.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

**HCV-5**      **Alternative Housing Quality Standards Compliance**

Plan Year: 2011      Implemented: 2011      Closed Out: 2014

Refer to Section D. Closed Out Activities. This activity did not yield expected outcomes.

**HCV-6**      **Time Limits for Housing Choice Voucher Participants**

Plan Year: 2013      Implemented: 2014 Planning Phase  
2015 Resident Impact

PMHA has established time limits for the Housing Choice Voucher program. Participants who are able to work (i.e., not considered elderly or disabled, or are a parent of a child under age 1) are expected to work or attend an approved school program, or they will lose a month of eligibility of HCV assistance. Each individual is granted 36 months of unemployment/non-participation in education. When an individual reaches the end of their 36 months, they will be considered ineligible for housing assistance for no less than one year, and all rent calculations for the household will be calculated on a pro-ration basis similar to the treatment given to other households with ineligible members.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

**HCV-7**      **Capped Utility Reimbursement Checks**

Plan Year: 2012      *Refer to C.-Activities on Hold*

**HCV-8**      **Transitional Housing Vouchers**

Plan Year: 2012      Implemented: 2012

The Transitional Housing Voucher allows for PMHA to move a long-standing transitional housing program previously located at Renaissance Place, a Public Housing development, to a tenant-based program. This change allows for Public Housing to become more uniformly managed while offering a more flexible approach to housing formerly homeless persons for one year and offers a greater choice in housing for this population. Supportive services are provided to participating households. This activity

provides a one-year voucher to families. Intensive supportive services are provided to participants, with an emphasis on employment and self-sufficiency. The voucher ends after one year and is not renewable, but participants are eligible to obtain Public Housing or a traditional Housing Choice Voucher during their time in this program.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

**HCV-9      Elimination of Deductions in Total Tenant Payment Calculations**

Plan Year: 2014                      Implementation: 2015

PMHA proposes to calculate total tenant payments and base Housing Choice Voucher assistance for all households on a calculation that is 29.6% of gross monthly income and eliminate deductions and allowances for being elderly or disabled, for dependents, and for unreimbursed medical and child care expenses. The only exception to the 30% of monthly gross income is a continuation of a \$50 minimum rent for households who otherwise pay less than \$50 per month.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

**HCV-10      Biennial Reviews for Non-Elderly/Non-Disabled Households**

Plan Year: 2014      Implemented: August 2014  
On-Hold: May 2015 to April 30, 2016 *(This was done in order to identify eligible households and create a uniform timetable for re-certifications.)*  
Re-Implemented: May 2016

Portage Metropolitan Housing Authority will conduct reviews of income at least once every 24 months as opposed to current requirements of annually. Families may continue to request interim reviews at any time. This activity would be applied to all MTW Vouchers held by households not considered “elderly” or “disabled”.

PMHA anticipates this activity will reduce the costs of annual re-certifications the program by 50% when fully implemented. Cost savings will be used to address HCV funding issues and to enable staff to identify and address specific barriers to self-sufficiency with household members.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

***HCV-11      Permit Households at \$0 HAP to Self-Certify Income***

Plan Year: 2014      Implementation: August 1, 2014

This activity would permit families who are at \$0 HAP to self-certify their income rather than be subjected to a verification process that should have no effect on housing assistance levels, thus reducing costs and staff time while achieving greater cost effectiveness in Federal expenditures.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

***HCV-12      Use Lesser of Actual Unit Size or Unit Size of Voucher Issued for Utility Allowances***

Plan Year: 2014      Refer to D. Closed-Out Activities

***HCV-13      Extend the \$0 HAP Period to 12 Months***

Plan Year: 2014      Implemented: August 2014

PMHA proposes to extend the period of time a family may be considered a Housing Choice Voucher participant household from the current six months to up to 12 months.

The impact of this activity asserts that some families either are reluctant to attain \$0 HAP status or when notified that they are at \$0 HAP, they take measures that reduce their income so as to begin receiving HAP assistance again. By increasing the period allowed for \$0 HAP, PMHA expects to see more families achieve \$0 HAP and to exit the program at \$0 HAP rather than to return to HAP payment status. For those who achieve \$0 HAP status through employment, the extended period allows a safety net to the household as they adjust to paying market rents without assistance and stabilize themselves in their new employment situation.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

**HCV-14**      **Permit Decreases in Payment Standards at Next Scheduled Verification**

Plan Year: 2014      Refer to B-Not Yet Implemented Activities

**HCV-15**      **Change the Allocation of Interest Earned for the Housing Choice Voucher Family Self-Sufficiency Program**

Plan Year: 2014      Implemented: 2015

PMHA will no longer apply escrow credits for interest earned on funds deposited for the Housing Choice Voucher Family Self-Sufficiency Program. These funds will be made available for ongoing HAP needs for the Housing Choice Voucher Program as a whole. PMHA expects that the impact of this activity will provide minimal additional revenue (\$200) to the Housing Choice Voucher funds. Staff savings of approximately 12 hours per year will result.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

**PUBLIC HOUSING**

**PH-1**      **Escalating Minimum Rent**

Refer to D. Closed Out Activities

**PH-2**      **Maximum Rent**

Plan Year: 2009      Implemented: 2009

Maximum Rent allows for rents set at less than 30% of adjusted income. Maximum rents are \$465 per month for 1 and 2 bedroom units, and \$490 per month for 3 and 4 bedroom units, regardless of income. Income re-verifications are biennially for these households. Households will have no time limit for ceiling rents.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

**PH-3**      **Elderly and Disabled Rent Re-certifications Biennially**

Refer to D. Closed-Out Activities

This activity was re-posed in Plan Year 2014 to Re-Certification of Elderly and Disabled to Every Three Years for both Public Housing residents and Section 8 Tenants.

***PH-4            Change in Employment Income***

Plan Year: 2008    Implemented: January 2012

Change in employment income resulting in an increase in annual income of any amount is not processed until the next annual re-certification. However, residents are expected to report changes.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

***PH-5            Rent Adjustment for Income Decreases***

Plan Year: 2009    Implemented: 2009

Decreases in income resulting in less than \$1,000, or lasting less than 30 days, will not be processed until the next annual re-certification.

This rent reform activity is seldom used. However, whenever a household experiences an income decrease less than \$1,000, the time to process the decrease is costly to the PMHA and has minimal impact on the household when the income decrease lasts less than 30 days. On many occasions, households locate new employment or other sources of income within 30 days. Thus, the PMHA views this activity as being effective as a cost-savings feature. This activity does not give incentives to households to achieve self-sufficiency.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

***PH-6            Overall Percentage of Income Amounts for Rent Calculations***

Plan Year: 2012    Implemented: April 1, 2012

This activity was implemented April 1, 2012. The percentage of earned income would be set at 26% of income in an effort to promote work activity and offset the elimination of the allowance for non-reimbursed childcare expenses.

PMHA evaluates this feature to ensure affordability on a quarterly basis. To date, households with wage incomes are experiencing gains in average annual income, which is an indication that impacts are being met.



in PIC due to the nature of the specific population served. Family and Community Services screens and selects eligible candidates for this program known as ROOT. Thus, Standard HUD Metrics do not apply.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

***PH-11      Deduction for Absent Child***

Refer to D. Closed out Activities.

***PH-12      Cap on Dependent Child Deduction***

Plan Year: 1999      Implemented: 2000

Plan Year: 2014      This activity originally related to both Public Housing and Housing Choice Voucher Programs. However, due to a revision of rent reform activities for the HCV program in 2014, this activity was no longer used in the HCV program.

The Public Housing Program will continue to give a \$480 allowance for each family member (other than the head or spouse), who is disabled or a minor, and for family members who are 18 and older who are full-time students or who are disabled. This allowance is not to exceed \$960, except that current residents (as of April 23, 1999) are entitled to an allowance of \$480 for each family member who is a minor and for family members who were 18 and older and full-time students or who are disabled as of June 1, 2000.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

***PH-13      Residents paying ceiling rents may self-certify income***

Plan Year: 2015      Implemented: 2016

Residents paying ceiling rents are allowed to self-certify their income for the purposes of the re-verification process. Such families pay the same rental amount regardless of income increases. This activity results in reducing costs by saving staff time devoted to income verification and also achieves greater cost effectiveness in federal expenditures.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

## **BOTH HOUSING VOUCHER and PUBLIC HOUSING PROGRAMS**

### ***B-1           Exclusions of Overtime, Bonuses and Income from Assets***

Plan year: 1999    Implemented: 2000

To promote the accumulations of assets, PMHA excludes income from new employment income, overtime, bonuses and interest from bank assets such as checking and savings accounts and certificates of deposit.

**Note:** This activity was modified in 2012 for the Public Housing program to exclude income from “new” employment until annual re-certification for reporting purposes.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

### ***B-2           Cap on dependent child deduction***

Plan Year: 1999    Implemented: 2000

This activity was discontinued for the Housing Choice Voucher Program in 2014 (**Refer to Closed-Out Activities B-2**). The Public Housing Program continues to implement this activity (**Refer to PH-12**).

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

### ***B-3           Utility Allowance Payments are used to repay participant debts owed to the Housing Authority***

Plan Year: 2009    Implementation: 2010

PMHA will withhold utility allowance checks for households who owe PMHA money to be used to repay those debts. Once the tenant account is returned to zero balance, the utility allowance checks will resume.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

**B-4**                    **Pro-ration of the utility allowance schedule up to the percentage of pro-ration of funding as established by HUD due to appropriations:**

Plan Year: 2009                    Implemented: 2014 (for Public Housing Program)  
Refer to Section B. Not Yet Implemented Activities for  
Housing Choice Voucher Program.

To offer an additional tool to deal with reductions in HUD subsidy for Public Housing or Housing Choice Vouchers, PMHA has authority to reduce utility allowance payments to address funding shortfalls.

PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

**B-5**                    **Single Fund Budget Flexibility**

Plan Year: 2009                    Implemented: 2013

This activity is no longer considered a MTW activity and will no longer be reported as such. Related information is referenced in the Financial Section of this report

**B-6**                    **Income verifications conducted for approved government programs may be substituted for PMHA income verifications if performed within the previous 90 days**

Plan Year: 2009                    Refer to Section B. Not Yet Implemented Activities

**B-7**                    **Employment and education deductions**

Plan Year: 1999 Implementation: 2000.

Note: This activity was closed out for Public Housing program in 2012 and for HCV in 2015. See D. Closed Out Activities.

**B-8**                    **Adoption of Local Investment Policies**

Plan Year:                    2014

PMHA seeks to evaluate and utilize State of Ohio investment alternatives when appropriate for earning greater returns without compromising asset safety

Refer to B. Not Yet Implemented Activities

**B-9**                    **Verifications of Income Valid for 180 Days**



PMHA does not plan or anticipate any non-significant changes or modifications; any changes or modifications to metrics, baselines, or benchmarks; nor any different authorizations for this activity in 2017.

## **B. Not Yet Implemented Activities**

**HCH-14**

### **Permit Decreases in Payment Standards at Next Scheduled Verification**

Plan Year: 2014

PMHA proposes changing the implementation of new payment standards established by the housing authority to be effective at the date of the anniversary of household assistance (formerly known as the annual verification), rather than be implemented the second annual verification following the change. Under present regulations, housing authorities may not lower payment standards until the 2<sup>nd</sup> annual certification after the lowering of the payment standards, which hampers a PHA from taking action to lower HAP costs quickly and more fairly across all participant households. In 2013, PMHA raised minimum rents from \$25 to \$50 as part of its response to the federal sequester and the need to reduce HAP costs. This increased the rent burden on the lowest income participants and for lesser results on HAP than if PMHA were permitted to reduce payment standards slightly, across the board for all participants. This activity is considered critical to PMHA being able to adjust HAP spending quickly and in a more equitable manner (compared to raising minimum rents or adjusting rent calculations) that can spread the cost of budget cuts across a greater portion of the HCV recipient population more quickly.

This activity will be implemented in 2017.

No changes are expected to the original activity proposed.

**B-4**

### **Pro-ration of the utility allowance schedule up to the percentage of pro-ration of funding as established by HUD due to appropriations:**

Plan Year: 2009

This activity was implemented in 2014 for the Public Housing Program. Implementation is expected in 2017 for the Housing Choice Voucher Program.

No changes are expected to the original activity proposed.

**B-6** ***Income verifications conducted for approved government programs may be substituted for PMHA income verifications if performed within the previous 90 days.***

Plan Year: 2009

This activity was not implemented as the agencies involved determined that the forecasted efficiencies were not going to be realized. PMHA will consider implementation during 2017 if renewed discussions yield a positive result. However, PMHA documentation is now used as verification for various programs including home delivered meals, food bank eligibility and for school supplies distribution.

No changes are expected to the original activity proposed.

**B-8** ***Adoption of Local Investment Policies***

Plan Year: 2014

PMHA seeks to evaluate and utilize State of Ohio investment alternatives when appropriate for earning greater returns without compromising asset safety

PMHA has not implemented the new local investment policies but expects to submit for Board approval a new policy by the end of 2017. This activity will allow PMHA to invest in a state government program for state and local governments in Ohio that permits pooled collateralized investment that obtains higher interest rates than is typically available to PMHA on its own while remaining completely liquid as an asset.

No changes are expected to the original activity proposed.

**C. Activities on Hold**

**HCV-7** ***Capped Utility Reimbursement Checks***

Plan Year: 2012

This activity was intended to eliminate “double dipping” for utility costs by setting utility allowance reimbursement maximums based on the State of Ohio’s PIPP Plus program, a program that subsidizes low-income households’ utilities by allowing them to pay utility bills on the basis on income, not on the amount of service used. However, these same families were eligible for and receiving utility reimbursement checks with the intention to pay off their entire month’s utility bill.

This activity is on hold as PMHA works with its software provider to ensure rent calculations and utility allowance checks are accurately performed and issued.

During 2017, this activity will be reviewed to determine if the cost for software changes is appropriate and affordable for the value gained from the activity.

No changes are expected to the original activity proposed.

**B-10**                      **Eliminate All Excluded Income from the Income Verification Process**

Plan Year: 2014 Implemented: Housing Choice Voucher Program: August 2014  
Implemented: Public Housing Program: September 2014

PMHA would cease verifying any fully excluded income sources for households. While PIH 2013-04 provides guidance for this activity, the approval as a MTW activity would ensure that developed practices would continue if PIH 2013-04 is rescinded, amended or superseded. This activity is expected to simplify income verifications, saving time for PMHA staff, participants and other agencies.

No changes are expected to the original activity proposed.

**D. Closed Out Activities**

**HCV-5**                      **Alternative Housing Quality Standards Compliance**

Plan Year: 2011      Implemented: 2011              This activity ended in 2014

PMHA was to use the results of municipal housing/rental housing inspections as an alternative to HQS, where available. This activity did not yield expected outcomes due to changes within inspection programs by local cities and conflict with tenant move-in schedules.

**HCV-12**                      **Use Lesser of Actual Unit Size or Unit Size of Voucher Issued for Utility Allowances**

Plan Year: 2014      Implemented: Not Applicable

PMHA will apply the lesser utility allowance of either the actual unit size leased by the family, or the unit size of the voucher issued.

This proposed activity was passed into a Federal Law July 2014. This activity was included in the 2014 Plan prior to the passing into Federal Law.

**PH-1**                      **Escalating Minimum Rent**

Plan Year: 2008      Implementation: 2008      This activity ended in 2011

PMHA planned to establish a schedule of minimum rents that would start at \$25 per month and increase every two years by \$25.

PMHA discarded the activity after recognizing that its implementation was unduly administratively burdensome and was not expected to accomplish the goals of encouraging work activity and self-sufficiency. Other rent reform activities with more promising results made this activity undesirable.

**PH-3**                      **Elderly and Disabled Household Rent Re-certifications Biennially**

Plan Year: 2000      Implemented: 2000      This activity ended in 2014

PMHA conducted rent re-certifications for elderly and disabled households every two years instead of annually. The activity was expanded to Triennial rent re-recertification in 2014 and is now identified as Activity B-11.

**PH-8**                      **Deduction for Elderly and Disabled Adults**

Plan Year: 2000      Activity was never implemented and closed out in 2014.

PMHA was considering increasing the deduction from income from \$400 to a higher amount as part of a larger rent reform. It was intended to be included as part of a larger rent reform initiative, but was ultimately not included due to cost and funding reasons.

**PH-9**                      **Providing Transitional Housing**

Plan Year: 1999      Implementation: 1999      This activity ended in 2012

Up to 42 units of transitional housing was set aside for previously homeless families at Renaissance Place and Community Estates. Through partnership with Family and Community Services and its Portage Area Transitional Housing (PATH) program, residents receive on-site intensified case management services as they move toward self-sufficiency over the course of a two-year time limit.

PMHA now provides some transitional housing assistance through a MTW activity in the Housing Choice Voucher program.

The on-site, project-based program at the original public housing sites proved to be costly to PMHA due to higher turnover and shorter participation limits. Additionally, funding for transitional housing from HUD and other sources had progressively declined as the emphasis shifted nationally to a “Housing First” model.

**PH-11**                      **Deduction for Absent Child**

This activity will not be implemented.      Plan Year: 2009      Closed Out: 2013

This activity was not implemented as it became clear that PMHA would have substantial difficulties in implementing and maintaining the activity administratively. The number of households that had split families and both families receiving Public Housing assistance at the same time, was also minimal at best. The most frequent and burdensome to families, scenario was that some subsidized families pay child support to families not being subsidized for housing, and thus not eligible for the activity.

**B-2**                              **Cap on Dependent Child Deduction**

Plan Year: 1999      Implemented: 2000      Discontinued for HCV program: 2014

This activity was discontinued for the Housing Choice Voucher Program in 2014 due to revised rent-reform policies which included a flat 29.6% of income calculation.

The activity is still relevant to the Public Housing Program. Refer to PH-13: Approved and Implemented Activities.

**B-4**                              **Single Fund Budgeting with Full Flexibility for Eligible Funds**

Plan Year: 2009      Implemented: 2009                      Closed Out: 2014

PMHA was authorized to use single fund budgeting and full fungibility for specified funds under the restated MTW agreement, and has used this authority in limited measures since.

In discussions with the MTW office, it was determined that this activity is no longer considered a MTW activity for the purposes of the current activities section of this plan, and will no longer be reported as such.

**B-5**                              **Income Verifications Conducted for Approved Government Programs May Be Substituted for PMHA Income Verifications if Performed Within 90 Days**

Plan Year: 2009      Closed Out: 2014

PMHA would use the information gathered and certified to by residents in their eligibility determinations performed for other means-tested programs, if this information was no older than 90 days.

This activity was not implemented after changes in leadership at other agencies changed the willingness to exchange information with the Housing Authority.

***B-7***                      ***Employment and education deductions:***  
Plan Year: 1999        Implementation: 2000

PMHA discontinued this activity April 2012 for public housing residents. Replacing this activity was the implementation of a 4% deduction on all earned income and an income exclusion for new earnings until annual re-certification.

The activity was discontinued for HCV program in 2015 due to rent reform activities.

## **Section V: Sources and Uses of Funds**

**(See Following Page)**

**(V) Sources and Uses of Funds**

**Annual MTW Plan**

**V.1. Plan Sources and Uses of MTW Funds  
A. MTW Plan: Sources and Uses of MTW Funds**

**Estimated Sources of MTW Funding for the Fiscal Year**

PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$955,676
70600	HUD PHA Operating Grants	\$12,166,570
70610	Capital Grants	\$407,942
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$245,492
71100+72000	Interest Income	\$4,294
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$421,724
<b>70000</b>	<b>Total Revenue</b>	<b>\$14,205,698</b>

**Estimated Uses of MTW Funding for the Fiscal Year**

PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$1,975,348
91300+91310+92000	Management Fee Expense	\$245,492
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$97,185
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$316,985
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$955,142
95000 (95100+95200+95300+95500)	Total Protective Services	\$0
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$103,437
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$146,642
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$3,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$9,774,769
97400	Depreciation Expense	\$582,490
97500+97600+97700+97800	All Other Expenses	\$0
<b>90000</b>	<b>Total Expenses</b>	<b>\$14,205,490</b>

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

No activity will only utilize the Single Fund Flexibility

<b>V.2. Plan. Local Asset Management Plan</b>	
<b>B. MTW Plan: Local Asset Management Plan</b>	
Is the PHA allocating costs within statute?	<input type="checkbox"/> Yes or <input type="checkbox"/>
Is the PHA implementing a local asset management plan (LAMP)?	<input type="checkbox"/> or <input type="checkbox"/> No
If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.	
Has the PHA provided a LAMP in the appendix?	<input type="checkbox"/> or <input type="checkbox"/> No
<b>PMHA has not provided a LAMP in the appendix because it is not implementing a local asset management plan.</b>	

### **Section VI: Administrative**

Certification of Compliance; PMHA Board Resolution and Public Hearing documents are attached in the Appendix.

**PMHA held public meetings** to develop and present the 2016 Annual Plan as follows:

- |                              |  |
|------------------------------|--|
| April 7, 2016                | Etna House, Ravenna<br>Eastowne Manor, Ravenna                 |
| May 9, 2016                  | Heritage Knolls, Kent  |
| May 9, 2016<br>July 5, 2016  | Athena Drive, Kent<br>Athena Drive, Kent                       |
| May 10, 2016<br>July 5, 2016 | Town Square Villas, Brimfield<br>Town Square Villas, Brimfield |
| May 19, 2016<br>July 5, 2016 | Harvest Woods, Ravenna<br>Harvest Woods, Ravenna               |
| May 11, 2016                 | Community Estates, Ravenna<br>Renaissance Place, Ravenna       |
| May 16, 2016                 | Portage Metropolitan Housing Authority (Central Office)        |

A total of 32 individuals participated in the meetings to develop and review the plan. The final draft of the 2017 MTW Plan was made available for public review September 1, 2016 with a public hearing held on October 3, 2016.

The Portage Metropolitan Housing Authority collects information for the purposes of evaluating MTW program results, for reporting the annual MTW report to HUD and for planning purposes by using existing PMHA staff. PMHA does not hire any independent outside evaluators to perform assessments of the activities or the MTW program as a whole.

The Annual Statement/Performance and Evaluation Report (HUD 50075.2) is attached as an Appendix.

## **Portage Metropolitan Housing Authority**



### **Public Hearing-2017 Moving To Work Annual Plan October 3, 2016 AGENDA**

- I. Introduction**
- II. Background on Moving to Work Program**
- III. Three Statutory Goals**
  - Reduce Cost and achieve greater cost effectiveness in federal expenditures
  - Create incentives for families to work, seek work, or prepare for work
  - Increase housing choices for low income families
- IV. Review of Moving to Work Annual Plan 2017**
- V. New or Revised Goals and/or Activities**
  - From Six to Four households will become new homeowners through the Housing Choice Voucher Homeownership Program in 2017

- Examine and revise PMHA's organizational chart to maximize employee productivity
- Recruit and staff vacant positions within a reasonable timeframe as related to the nature of the position
- HCV-3 Initial rent burden cap from 70% to 50% of adjusted monthly income
- Convert Renaissance Place unit 101 from office space to resident housing

**VI. Other Issues**

**VII. Adjournment**

**Portage Metropolitan Housing Authority**



**Public Hearing-2017 Moving To Work Annual Plan**

10:00 A.M.  
2832 State Route 59, Ravenna OH 44266  
October 3, 2016

**MINUTES**

The Hearing was convened at 10:00 a.m. by Romaine Chritton, PMHA Staff. Attending was Mandy Berardinelli from Portage County Job and Family Services.

Ms. Chritton provided an overview of Moving to Work and the Three Statutory Goals of the program. Also provided was a general review of the proposed PMHA MTW 2017 Annual Plan.

The New or Revised Goals and/or Activities were explained by Ms.Chritton. Ms. Berardnielli expressed support for them.

No Other Issues were brought forward.

The meeting adjourned approximately 10:30 A.M.

Respectfully Submitted by:

A handwritten signature in black ink that reads "Romaine Chritton". The signature is written in a cursive, flowing style.

Romaine Chritton

Housing and Special Projects Manager

**2016 Public Hearing**  
 October 3, 2016-2832 State Route 59, Ravenna, OH 44266  
 10:00 A.M.  
 Portage Metropolitan Housing Authority  
 2017 Moving To Work Annual Plan

Name:	Address: Phone Number
Mandy Berardinelli	449 S. Meridian ST Ravenna, OH (3)298-4528 mandy.berardinelli@jfs.ohio.gov
Romaine Chritton	PMHA Staff

## **For Record-Courier, classified advertisements (B)**

Portage Metropolitan Housing Authority's 2017 Moving to Work Annual Plan is available for public review and comment from September 1 to and including September 30, 2016. A public hearing discussing the Annual Plan will be held at the PMHA office, 2832 State Route 59, Ravenna, Ohio on October 3, 2016 a 10:00 a.m. A copy of the 2017 Annual Plan is available upon request by e-mail to [rchritton@portagehousing.org](mailto:rchritton@portagehousing.org) or at the office address listed above.

-END-

### **ADDITIONAL APPENDIX ITEMS**

**Resident Commissioner:** The City Manager of Kent, Ohio appoints the resident commissioner position. This position is currently occupied by Linda UmBayemake.

**Non-Smoking Policies in Public Housing:** PMHA has adopted non-smoking policies for Walnut House group home. PMHA has no intention of implementing a non-smoking policy in Public Housing as long as it is not a requirement of law or HUD regulation.

**Violence Against Women Act:** PMHA is committed to assisting victims of domestic violence. PMHA's Administration Plan and Admissions and Continued Occupancy Plans are written to protect victims of either gender from unfair evictions and program terminations due to the violence perpetuated against them. PMHA reviews police reports for Public Housing to identify the need to refer residents to counseling and other necessary domestic violence programs. PMHA will also pursue evictions against residents responsible for domestic violence. For the purposes of discussion here, these activities include victims of all criminal activity covered under the VAWA.

**Significant Modification to the Annual Plan:** PMHA considers the following actions or activities to be significant amendments or substantial deviations from the Annual Plan approved by the board of the PMHA and Department of Housing and Urban Development:

- Actions that fundamentally change the PMHA mission statement, goals, and objectives
- Actions that fundamentally change PMHA plans or policies in a manner that is inconsistent with the existing mission, goals, or objectives and requiring formal approval of the Board of Commissioners of PMHA.

- Actions that require a MTW waiver approval from the Department of Housing and Urban Development

**(C)** There are no planned or ongoing PMHA directed evaluations of the demonstrations for the overall MTW program or any specific MTW activities with the exception of regular review of program data and reports by affiliated managers including Public Housing, Section 8, Finance, and Capital Funds.

**PHAS:** PMHA chooses not to be evaluated under the Public Housing Assessment System until required to do so by the Department of Housing and Urban Development.

**(D) The Annual Statement/Performance and Evaluation Report (HUD 50075.1) or subsequent form required by HUD**

**Note: In lieu of HUD 50075.1 the PMHA chooses to include its Capital Fund Program Five-Year Action Plan which follows:**

<b>Capital Fund Program - Five -Year Action Plan</b>				U.S. Department of Housing and Urban Development Office of Public and Indian Housing Expires 4/30/2011		
<b>Part I: Summary</b>						
<b>Portage Metropolitan Housing Authority - OH31</b>		City of Kent - 44240, City of Ravenna - 44266 and Portage County, Ohio		<b>X Original 5-Year Plan</b>		<b>Revision No:</b>
A.	Development Number and Name	Work Statement for Year 1 FFY: 2016	Work Statement for Year 1 FFY: 2017	Work Statement for Year 1 FFY: 2018	Work Statement for Year 1 FFY: 2019	Work Statement for Year 1 FFY: 2020
B.	Physical Improvements Subtotal	Annual Statement	\$ 215,162.30	\$ 225,162.30	\$ 225,162.30	\$ 190,162.30
C.	Management Improvements		10,000.00	-	-	-
D.	PHA-Wide Non-dwelling Structures and Equipment		0.00	0.00	0.00	30,000.00
E.	Administration		40,794.20	40,794.20	40,794.20	40,794.20
F.	Other		40,000.00	40,000.00	40,000.00	40,000.00
G.	Operations		101,985.50	101,985.50	101,985.50	101,985.50
H.	Demolition		0.00	0.00	0.00	0.00
I.	Development		0.00	0.00	0.00	0.00
J.	Capital Fund Financing- Debt Service		0.00	0.00	0.00	0.00
K.	Total CFP Funds		\$ 407,942.00	\$ 407,942.00	\$ 407,942.00	\$ 402,942.00
L.	Total Non-CFP Funds		0.00	0.00	0.00	0.00
M.	Grand Total		\$ 407,942.00	\$ 407,942.00	\$ 407,942.00	\$ 402,942.00
			Page 1 of 9		form HUD-50075.2	
(4/2008)						

















**Certification by State or Local  
 Official of PHA Plans Consistency  
 with the Consolidated Plan or  
 State Consolidated Plan  
 (All PHAs)**

U. S Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 2/29/2016

**Certification by State or Local Official of PHA Plans  
 Consistency with the Consolidated Plan or State Consolidated Plan**

I, **Todd Peetz, Director** of the **Portage County Regional Planning Commission**  
*Official's Name/Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the:

**Portage Metropolitan Housing Authority**  
*PHA Name*

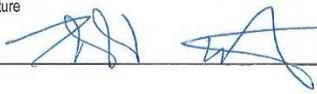
is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of  
 Impediments (AI) to Fair Housing Choice of the:

**County of Portage, State of OHIO** pursuant to 24 CFR Part 91.  
*Local Jurisdiction*

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State  
 Consolidated Plan and the AL.

**PMHA provides and implements public and subsidized housing programs to address the housing needs of low-to moderate income households within Portage County. It also offers opportunity for homeownership. Portage County sees an increase in the number of residents 55-64 years of age as well as residents with fewer job opportunities since the decline of jobs in manufacturing. Thus, affordable housing is integral to meeting the needs of those aging and those employed but receiving low-wages. Indicators, such as Section 8 Administrative Plan and Public Housing Admissions and Continued Occupancy Plan suggest that PMHA complies with Fair Housing principles.**

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	Title
Todd Peetz	Director
Signature	Date
	8/30/16

RECEIVED  
 2016 AUG 31 AM 10:56  
 PORTAGE METROPOLITAN  
 HOUSING AUTHORITY

**5 Legals**

**DEADLINES FOR LEGALS**  
Legal notice deadline in this edition is 3 days prior to publication and Thurs. for Sat., Sun. & Mon. editions. e-mail legals to [legals@recordpub.com](mailto:legals@recordpub.com)

**Public Notice**  
Community Legal Aid Services, Inc. Board Meeting will be held on 09/07/16 at 6:00pm at the NEOMED Health and Wellness Center, in Rootstown, OH. Call Z o e n n P o w e l l at 330-983-2551 with questions.  
RC, Aug 31, 2016, 12218108

Portage Metropolitan Housing Authority's 2017 Moving to Work Annual Plan is available for public review and comment from September 1 to and including September 30, 2016. A public hearing discussing the Annual Plan will be held at the PMHA office, 2832 State Route 53, Ravenna, Ohio on October 3, 2016, at 10:00 a.m. A copy of the 2017 Annual Plans is available upon request by e-mail to [rchrilton@portagehousing.org](mailto:rchrilton@portagehousing.org) or at the office address listed above.  
RC, Aug 31, 2016, 12218191

**NOTICE OF REQUEST**

DOCUMENTATION of Public Notice as published (B)

Resolution No. 16-41

**APPROVING PMHA'S 2017 MTW ANNUAL PLAN**

**WHEREAS**, as directed by the Moving To Work (MTW) Revised Agreement requirement that all Public Housing Authorities prepare and submit an Annual and 5-Year Plan, the Portage Metropolitan Housing Authority has drafted an Agency Plan and related policies following a public hearing process, and

**WHEREAS**, the Board of Portage Metropolitan Housing Authority has reviewed the draft documents and resident comments,

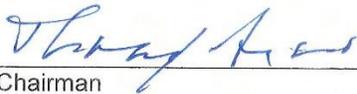
**NOW, THEREFORE, BE IT RESOLVED** that the Board of the Portage Metropolitan Housing Authority hereby certifies that the public hearing requirement has been met and further approves the following:

1. 2017 MTW Agency Plan
2. HUD Form 50077, Certification of Compliance

*Passed by the PMHA October 11, 2016*

PORTAGE METROPOLITAN HOUSING AUTHORITY

BY:

  
Chairman

  
Secretary

I, Pamela Nation Calhoun, Secretary of the Board of the PMHA, do hereby certify that the foregoing is a true and correct copy of a Resolution of the PMHA duly adopted October 11, 2016, and that all deliberations of this Board were in meetings open to the public, in compliance with all legal requirements including Sec. 121.22 of the ORC.

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

**Certifications of Compliance**

Annual Moving to Work Plan  
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 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 Annual Moving to Work Plan for the PHA fiscal year beginning 01/01/2017 after referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The 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 PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The 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 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.
4. The 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 PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The 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.
10. The 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.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The 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.

Attachment B  
31

