

# PHA Name : Pomona

**PHA Code :** CA123

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 7/1/2021

**PHA Program Type:** Housing Choice Voucher (HCV) only

**MTW Cohort Number:** 1

**MTW Supplement Submission Type:** Annual Submission

## **B. MTW Supplement Narrative.**

As an MTW Agency, the Pomona Housing Authority (PHA) will be given the flexibility and authority to develop policies outside the limitations of certain HUD regulations and provisions. This will allow the PHA to achieve its mission and program goals at a higher level by leveraging the unique needs and concerns of the community and residents of Pomona. The PHA is a high performing housing authority that provides safe, decent and affordable housing to hundreds of Pomona residents through special programs serving families, individuals, senior citizens, Veterans, the disabled and homeless households. The PHA's mission is to improve the quality of life for our diverse community. The PHA provides financial assistance through the Housing Choice Voucher and Project-Based Voucher (also collectively known as the Section 8) Programs, and through the Housing and Urban Development Veteran Affairs Supportive Housing, Mainstream, and Foster Youth Initiative Tenant Protection Voucher programs.

The MTW Program will allow the PHA to combine resources permitting the use of HUD funds to better address local program priorities and needs. In addition, the PHA will streamline its business processes to operate more cost effectively and efficiently by implementing innovative business solutions, redesign processes, and amend policies that will reduce administrative complexity, costs and staff time. The PHA plans to consider and assess a range of potential options in subsequent phases of MTW, with a goal of structuring its programs in ways that will assist families achieve financial self-sufficiency over time. The following strategies will help improve the quality of lives of program participants: work in partnership with local community organizations to develop a comprehensive approach to ending homelessness and promote self-sufficiency and assist in the implementation of the City of Pomona's "A Way Home: Community Solutions for Pomona's Homeless Strategic Plan" by creating a program to assist the homeless and chronically homeless achieve self-sufficiency. The PHA proposes to explore its means of assisting these families to access and maintain permanent housing through further coordination with agencies who provide supportive services and expand the success of providing Landlord incentives.

**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).**

<b>1. Tenant Rent Policies</b>	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Plan to Implement in the Submission Year
l. Fixed Subsidy (HCV)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
o. Initial Rent Burden (HCV)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
u. Standard Deductions (HCV)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
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
<b>3. Reexaminations</b>	
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
<b>5. Housing Quality Standards (HQS)</b>	
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
<b>6. Short-Term Assistance</b>	
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
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)	
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program	

Coordinating Committee (HCV)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Plan to Implement in the Submission Year

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

<b>1.j. - Alternative Utility Allowance (HCV)</b>
The PHA will establish one streamlined utility allowance for all HCV units based upon bedroom size and types of utilities paid by the participant in the City of Pomona. The goal of this activity is to reduce the administrative burden of calculating multiple utility allowances based on unit type and streamline recertification processing time. The PHA will continue to review its utility allowance schedule each year and revise it if there has been a 10% change from the prior year. The Pomona Housing Authority will be implementing waiver [1j – Alternative Utility Allowance (HCV)] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.
This MTW activity serves the following statutory objectives: Cost effectiveness
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 to all assisted households
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
Currently, PHA annually reviews and periodically revises a Utility Allowance Schedule which represents the reasonable costs for utilities as part of the tenant's lease. The utility allowance is based on utility surveys and analysis of the structure type, bedroom size, appliances provided by tenant, and type of appliances (gas/electric). The simplified schedule will be based on the analysis of data collected from the PHA's existing HCV portfolio including the most common structure and utility types. This new utility allowance schedule will be implemented upon the biennial certification or change of unit. The PHA proposes a simplified schedule to reduce administrative costs and reduce errors associated with the traditional method of applying Utility Allowances. The simplified utility allowance schedule is also anticipated to benefit property owners who will have a more accurate understanding of the total

gross rent to be applied to their properties. This schedule will be applied to the lesser of: the actual size of the unit or the size of the voucher. The PHA will continue to use current market consumption data to determine when adjustments to the simplified schedule are needed (upon change of more than 10% in rates).

**1.n. - Utility Reimbursements (HCV)**

The PHA will eliminate the utility reimbursement payments in the HCV program. Families will continue to receive a utility allowance but will not receive additional monies if the utility allowance is greater than the total tenant payment. There are currently 21 families receiving utility reimbursements. Eliminating these reimbursements is a cost savings to the PHA of approximately \$13, 860 which could assist an additional HCV family from the waiting list and reducing the administrative burdens of lost checks, canceled checks and fraud. The Pomona Housing Authority will be implementing waiver [1n - Utility Reimbursements (HCV)] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

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 to all assisted households

N/A

No hardship were requested in the most recent fiscal year.

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

**1.s. - Elimination of Deduction(s) (HCV)**

This activity is not currently going to be implemented. Any information that remains is an artifact of the activity being previously selected for implementation. This display issue will be fixed in a future release.

N/A

No hardship were requested in the most recent fiscal year.

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

Following deduction(s) will be eliminated, modified, or added.

**1.u. - Standard Deductions (HCV)**

The Pomona Housing Authority is proposing a standard deduction for families to simply the rent calculation process, increase cost effectiveness and reduce administrative burdens. The standard deduction will be \$500 for elderly/disabled families and non-elderly families with one or more dependents:

- a child or children under the age of 18;
- disabled member in the household; or, a full-time student in the household

The Pomona Housing Authority will be implementing waiver [1u – Standard Deductions] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

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 to all assisted households

N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
500 will be the single standard deduction in the Fiscal Year

<b>3.b. - Alternative Reexamination Schedule for Households (HCV)</b>
The PHA will establish a biennial recertification schedule for all HCV families who have at least \$1,200 per year in annual income. Any families reporting less than \$1,200 per year in annual income will remain on an annual recertification cycle. The goal of this activity is to further self-sufficiency of residents and reduce the burden of reporting to the PHA if the family has increase income. The Pomona Housing Authority will be implementing waiver [3b – Alternative Reexamination Schedule for Households (HCV)] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.
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: 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
N/A
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, Pomona 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.
Recertification Schedule is Once every two years
Household may request 1 interim recertifications per year.
To increase self-sufficiency of resident and reduce administrative cost at the PHA, the PHA is proposing to implement a biennial recertification schedule for all families. Families will be allowed up to one interim recertification per year if the household gross income has gone down by 10% or more.  If a family reports annual income from \$0 to \$1,200, they will remain on an annual recertification cycle until at least \$1,200 in annual income is received.

<b>3.d. - Self-Certification of Assets (HCV)</b>
At recertification, the PHA will allow families to self-certify assets up to \$50,000. The goal of this activity is self-sufficiency. The Pomona Housing Authority will be implementing waiver [3d – Self-Certification of Assets (HCV)] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.
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 to all assisted households
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The dollar threshold for the self-certification of assets is \$50,000.

<b>4.b. - Damage Claims (HCV-Tenant-based Assistance)</b>
To incentivize a landlord's continued participation in the HCV program, the PHA will allow owners to submit a damage claim of up to one month's contract rent (minus any amounts paid in security deposit) for damages to the unit above and beyond normal wear and tear. The damage claim payment will be paid out to a landlord when the next HAP contract is executed between the owner and the PHA. The goal is to encourage landlords to continue to participate in the HCV program. The Pomona Housing Authority will be implementing waiver [4b – Damage Claims (HCV-Tenant-based Assistance)] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Increased 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
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to To all units
The types of units policy applies to:
Maximum payment to the landlord is \$Up to one month's contract rent paid as verified on the most recent Form HUD-50058. The participants security deposit must first be used to cover any damages..
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

<b>4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)</b>
In order to incentivize participation in the HCV program, the PHA will provide a one-time \$250 signing bonus for each new HAP contract executed in the City of Pomona. The goal is to increase owner participation in the HCV program. The Pomona Housing Authority will be implementing waiver [4c – Other Landlord Incentives (HCV-Tenant-based Assistance)] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Increased 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
N/A

No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to To all units (Display selected and additional Pop up is complex logic.)
The types of units policy applies to:
Maximum payment to the landlord is \$\$250.00.
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

<b>17.c. - Housing Development Programs</b>
The PHA intends to use MTW funding to acquire, renovate and/or build affordable units that are not public housing units. Eligible activities may include: Gap financing for non-PHA development of affordable housing, development of project based voucher units or tax credit partnerships. The PHA will not spend more than 10% of its HAP budget on local, non-traditional activities and families receiving housing or services through local, non-traditional activities must meet the HUD definition of low-income. This MTW activity will enable the PHA to redevelop additional PHA owned units and increase the amount of affordable housing in the City of Pomona. The Pomona Housing Authority will be implementing waiver [17c - Housing Development Programs] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Increased 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
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

**Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
252 E. 4th Street	Rehabilitation	Gap Financing	12.00	12.00	12.00		0.00	0.00

**Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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**Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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**Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<b>Safe Harbor Waivers seeking HUD Approval:</b> No Safe Harbor Waivers are being requested.

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<b>Agency-Specific Waiver(s) for HUD Approval:</b>  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.
<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b> MTW Agency does not have approved Agency-Specific Waivers

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	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.

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
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<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> 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.	
<b>Income Level</b>		<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
80%-50% Area Median Income		1
49%-30% Area Median Income		1
Below 30% Area Median Income		22
Total Local, Non-Traditional Households		<b>24</b>

\*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.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
MTW agency established a rent reform policy to encourage employment and self-sufficiency	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	10,873 # 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?
	0.00	0.00	0.00	0.00	0.00	0.00	0.00			0.00	0.00		0.00
Totals	0	0	0	0	0	0	0			0	0		

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<b>G.4 Comparable Mix (by Family Size) – Local, Non-Traditional.</b>	
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.	
<b>Family Size:</b>	<b>Occupied Number of Local, Non-Traditional units by Household Size</b>
1 Person	400
2 Person	213
3 Person	127
4 Person	74
5 Person	72
6+ Person	53
Totals	<b>939</b>

<b>H.</b>	<b>Public Comment</b>
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	

<b>I.</b>	<b>Evaluations.</b>
No known evaluations.	

**MTW 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 MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2021), hereinafter referred to as "the MTW Supplement", 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 MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement 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 MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will 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 any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Pomona Housing Authority  
**MTW PHA NAME**

CA135  
**MTW PHA NUMBER/HA CODE**

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

James Makshanoff  
**NAME OF AUTHORIZED OFFICIAL**

City Manager/Executive Director  
**TITLE**

  
**SIGNATURE**

11/4/21  
**DATE**

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

### MTW Waiver 3.b Alternative Reexamination Schedule for Households

To increase self-sufficiency of resident and reduce administrative cost at the PHA, the PHA is proposing to implement a biennial recertification schedule for all families. Families will be allowed up to one interim recertification per year if the household gross income has gone down by 10% or more.

If a family reports annual income from \$0 to \$1,200, they will remain on an annual recertification cycle until at least \$1,200 in annual income is received.

Waiver 3.b. Alternative Reexamination Schedule for Households			
		Implementation Year (FY2021)	FY2022
1.	Impact on the agency's finances	This activity is expected to reduce administrative costs due to less required annual and interim recertifications. The PHA processed approximately 912 annual recertifications and 332 interim certifications in the last year.	
2.	Impact on affordability of housing costs for affected families	This activity is expected to have no impact on the affordability of housing costs.	
3.	Impact on the agency's waitlist(s)	This activity is expected to have no impact on the agency's waiting list.	
4.	Impact on the agency's termination rate of families	The current termination rate is currently 5.21%. This activity should have no impact on the termination rate.	
5.	Impact on the agency's current utilization rate in the HCV program	The current utilization rate is 94.33% of ABA spent and 93.4% vouchers leased. This activity will have no impact on the agency's utilization rate.	
6.	Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	This activity meets the statutory goals of self-sufficiency and cost effectiveness.	
7.	Impact on the agency's ability to meet MTW statutory requirements	This activity will increase the PHA's ability to encourage self-sufficiency as families may earn additional income that does not have to be reported right away.	
8.	Impact on the rate of hardship requests and the number granted and denied as a result of this activity	The PHA has not received any hardship requests in the last fiscal year. The rate of hardship requests is expected to increase to 2%	
9.	Impact on protected classes (and any disparate impact)	This activity should have no disparate impact on protected classes.	

## **MTW Waiver 3.b Alternative reexamination Schedule for Households**

### **Hardship Policy**

The family must request a hardship. Family's will be granted one interim recertification per year if their income goes down 10% or more due to one or more of the following reasons:

1. The family has experienced a decrease in income because of changed circumstances including loss or reduction of employment, death in the family or reduction in or loss of earnings or other assistance;
2. The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education or similar items

If a hardship is granted, the family's income will be reassessed on **the earlier of** the next scheduled biennial recertification or within 6 months from the date the hardship was approved.

If the family disagrees with the denial of a hardship request, the family is entitled to and may request an informal hearing. The PHA will keep records of all hardship requests received and the results of those requests.



**Impact Analysis**

**MTW Waiver 1.u Standard Deduction**

The Pomona Housing Authority is proposing a standard deduction for families to simplify the rent calculation process, increase cost effectiveness and reduce administrative burdens. The following is the proposed standard deduction:

- Standard deduction of **\$500** all elderly/disabled families and will apply to non-disabled families with one or more of the following:
  - Child or children under the age of 18
  - Disabled member in the household
  - Full-time student in the household

<b>Impact Analysis Waiver 1.u. Standard Deductions</b>			
		Implementation Year (FY2021)	FY2022
1.	Impact on the agency's finances	This activity is expected to reduce HAP by approximately \$101,412 and reduce administrative costs.	
2.	Impact on affordability of housing costs for affected families	There is an overall average expected increase of \$9.00 in Total Tenant Payment (TTP) for all families per month; for elderly/disabled families the average increase is \$3; For families the average increase is \$17.	
3.	Impact on the agency's waitlist(s)	Due to the HAP savings, the PHA is expected to be able to serve an additional five families from the waiting list.	
4.	Impact on the agency's termination rate of families	The current termination rate is currently 5.21%. The PHA does not expect this to change at this time.	
5.	Impact on the agency's current utilization rate in the HCV program	The current utilization rate is 94.33% of ABA spent and 93.4% vouchers leased. The PHA expects the utilization to increase by 2-3%.	
6.	Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	This activity meets the statutory goal of cost effectiveness.	
7.	Impact on the agency's ability to meet MTW statutory requirements	This activity will increase the PHA's ability to save HAP dollars and lease more families.	
8.	Impact on the rate of hardship requests and the number granted and denied as a result of this activity	The PHA has not received any hardship requests in the last fiscal year. The rate of requests is expected to increase to no more than 2%.	
9.	Impact on protected classes (and any disparate impact)	There is no disparate impact on protected classes at this time.	

## MTW Waiver 1.u Standardized Deductions – REVISED 1/6/2022

### Hardship Policy

The family must request a hardship. The family will qualify for a hardship if based on the standard deduction policy, the total family share is over 40% of their monthly adjusted income. The household must be an elderly/disabled household with eligible medical expenses, have a disabled member in the home with disability expenses, and/or have children under the age of 13 and have out of pocket child care expenses to qualify for the hardship. The family will qualify for a hardship once every two years unless the PHA determines there are extenuating circumstances.

If the family qualifies for a hardship, the total family share will be reduced to no more than 32% of their monthly adjusted income for a period of 90 days.

Families will be granted a hardship if they are in a rent burden (paying over 40% of their monthly adjusted income) due to one of the following situations:

1. The family has experienced a decrease in income because of changed circumstances including loss or reduction of employment, death in the family or reduction in or loss of earnings or other assistance;
2. The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education or similar items

The family's income will be reassessed on **the earlier of** the next scheduled biennial recertification or within 90 days from the date the hardship was approved. The hardship may be extended if needed as a reasonable accommodation, for up to 6 months.

If the family disagrees with the denial of a hardship request, the family is entitled to and may request an informal hearing. The PHA will keep records of all hardship requests received and the results of those requests.

# CITY OF POMONA HOUSING AUTHORITY

## RESIDENT ADVISORY BOARD (RAB) AND PUBLIC COMMENTS RECEIVED AND RESPONSE TO THE MOVING TO WORK (MTW) SUPPLEMENT TO THE PHA ANNUAL PLAN FOR FISCAL YEAR 2021-2022

### **BACKGROUND**

The City of Pomona Housing Authority (PHA) applied for and was granted authority to participate in the Moving to Work (MTW) demonstration expansion program. The MTW program provides select public housing authorities with an opportunity to design and test innovative, flexible and locally-designed housing and self-sufficiency strategies for low-income families.

The “Quality Housing Work Responsibility Act of 1998” (QHWRA) contains a provision whereby a PHA must submit an Annual Plan. As a requirement to participate in the Moving to Work demonstration program, the PHA must submit an MTW supplement to the PHA Annual Plan and solicit feedback from the Resident Advisory Board (RAB), residents and the general public on the proposed policies.

### **MOVING TO WORK (MTW) AMENDMENT PUBLIC NOTIFICATION PROCESS**

A draft of the MTW Supplement with proposed waivers was made available to the public and published on the PHA website at [www.ci.pomona.ca.us](http://www.ci.pomona.ca.us) on August 25, 2021. The PHA held two resident meetings and a public hearing. The PHA did not receive any formal written comments during the 45-day comment period or any time thereafter. The PHA will continue to engage its stakeholders in future revisions to the MTW Plan and policies.

### **RESIDENT ADVISORY BOARD MEETINGS**

Two resident meetings were held on August 18, 2021, at 10:00 am and 4:00 pm. Notices of the resident meetings were posted on the City of Pomona website. A copy of the resident notice is attached. These meetings were held via webinar. There were 13 resident participants in the meeting.

### **2021-2022 Resident Advisory Board Members**

- Rebecca Hardaway
- Louisa Gillette
- Pauline Bradford
- Martha Rachal
- Diane Mendez
- Margarito Garcia

### **COMMENTS FROM RESIDENT MEETINGS AND PHA RESPONSE**

- **Standard Deductions**  
*Comment:* What if I have a disabled son in my home? Will I still get a deduction?  
*PHA response:* Based on the proposed policy, if there is at least one or more dependent in the home, the family will receive the standard deduction
- **Biennial Recertifications**  
*Comment:* What happens if I stop working?

PHA response: The PHA will allow one interim recertification per year if a family's income goes down 10% or more per year or if they have another hardship such as a death in the family or another change in circumstances.

**PUBLIC HEARING**

A notice of public hearing was published in the Inland Valley Daily Bulletin on August 25, 2021. The public hearing was held both in person and virtually on Monday, September 20, 2021, at 7:00 pm. A copy of the public hearing notice is attached. **There were no public comments received.**

**RESOLUTION NO. 2021-138**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF POMONA, CALIFORNIA, SITTING AS THE GOVERNING BOARD OF THE POMONA HOUSING AUTHORITY (PHA), APPROVING THE PHA'S MOVING TO WORK (MTW) SUPPLEMENT TO THE ANNUAL PHA PLAN AND TO RECEIVE AUTHORIZATION TO SUBMIT TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR FINAL REVIEW AND APPROVAL**

**WHEREAS**, the U.S. Department of Housing and Urban Development (HUD) has selected the Pomona Housing Authority to participate in the Moving to Work (MTW) Demonstration Expansion, to design and test new ways of providing housing assistance and services to low-income households; and

**WHEREAS**, the Pomona Housing Authority's has fully executed the MTW ACC Amendment to the Housing Choice Voucher Annual Contributions Contract which is the first step to officially becoming an MTW agency; and

**WHEREAS**, the PHA as a MTW agency is required to develop and complete a MTW Supplement Plan to the Annual Plan, which informs HUD, families served by the PHA, and members of the public about the MTW Waivers and associated activities that the PHA seeks to implement in the current Fiscal Year; and

**WHEREAS**, on September 20, 2021, a public hearing was conducted to receive public comment for consideration by the City Council, sitting as the Governing Board of the City of Pomona Housing Authority; and

**WHEREAS**, the PHA must now receive Board authorization, certifying the submission of the finalized the MTW Supplement Plan to the Annual Plan to HUD by completing the MTW Certifications of Compliance.

**NOW, THEREFORE, BE IT RESOLVED** by the City Council, sitting as the Governing Board of the Housing Authority of the City of Pomona as follows:

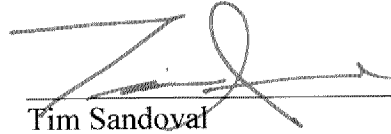
**SECTION 1.** That the Governing Board of the City of Pomona Housing Authority has reviewed and approved the revised MTW Supplement Plan to the Annual PHA Plan.

**SECTION 2.** Authorize the Executive Director of the Housing Authority or his designee to execute the MTW Certifications of Compliance and submission of the PHA's MTW Supplement to the PHA Annual Plan to HUD as mandated, which is on file in the office of the City Clerk and is incorporated herein by reference.


**SECTION 3.** The Authority Secretary shall attest and certify to the passage and adoption of this resolution and it shall become effective immediately upon its approval.

**PASSED, APPROVED AND ADOPTED** this 18<sup>th</sup> day of October, 2021.

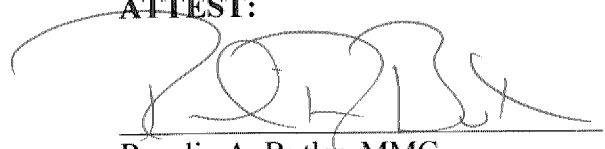
**CITY OF POMONA:**

  
\_\_\_\_\_  
Tim Sandoval  
Mayor

**APPROVED AS TO FORM:**

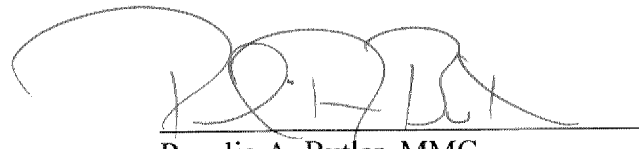
  
\_\_\_\_\_  
Sonia Carvalho  
City Attorney

**ATTEST:**

  
\_\_\_\_\_  
Rosalia A. Butler, MMC  
City Clerk

I, HEREBY CERTIFY that the foregoing resolution was duly adopted by the City Council of the City of Pomona at a regular meeting thereof held on October 18, 2021 by the following vote of the Council:

AYES: Nolte, Preciado, Garcia, Ontiveros-Cole, Lustro, Torres, Sandoval  
NOES: None  
ABSTAIN: None  
ABSENT: None

  
\_\_\_\_\_  
Rosalia A. Butler, MMC  
City Clerk