



Portage Metropolitan Housing Authority

2832, State Route 59, Ravenna, Ohio 44266

Pamela Nation Calhoun, Executive Director

Phone: (330) 297-1489 • Fax: (330) 297-6295 • www.portagehousing.org

Moving To Work 2021 Annual Plan

Submitted: October 8, 2020

Revised & Resubmitted: November 25, 2020

Amendment Submitted: May 25, 2021

Mission Statement: The Portage Metropolitan Housing Authority is dedicated to meeting the housing needs of low-income families and individuals of Portage County by developing, managing and supporting decent, affordable housing in cooperation with community partners.

TABLE OF CONTENTS

		Page
General Info	ormation	3
Section I	Introduction	6
Section II	General Operating Information	8
Section III	Proposed MTW Activities	14
Section IV	Approved MTW Activities	25
	A. Implemented Activities Housing Choice Voucher Program Public Housing Program Both HCV and PH Programs B. Not Yet Implemented Activities C. Activities on Hold D. Closed Out Activities	25 31 36 40 42
Section V	Sources and Uses of Funds	51
Section VI	Administrative	54
	 A. Board Resolution and Certifications of Compliance B. Documentation of Public Process C. Planned and Ongoing Evaluations D. Lobbying Disclosures Form SF-LLL Form HUD 50071 	59 68 69
Additional A	Appendix Items Definition of Significant Modifications Resident Commissioner Non-Smoking Policy HOTMA Policy VAWA Policy Portage Landings Renovations Security Improvements Project Capital Fund Program Capital Fund Program-	71 71 71 71 72 72 73

GENERAL INFORMATION



Demographics:

Portage Metropolitan Housing Authority (PMHA) is located in Portage County, Ohio, a mostly rural county in the midst of northeastern Ohio's urban centers. It offers convenient access to the Greater Cleveland, Akron/Canton, and Warren/Youngstown metropolitan areas. It is the home of Kent State University and Hiram College. Nearby institutions of higher learning including the University of Akron, Youngtown State, and Cleveland State offer additional education choices to Portage County residents.

The County is home to 162,644 persons, of which 90.8% are White, 4.1% African American, 1.9% Asian, 0.2% American Indian and Alaskan Native, less than 0.01% are Native Hawaiian and Other Pacific Islander, 2.4% are two or more races, and 0.6% identify as other race(s).

According to 2018 American Community Survey 5-Year Estimates, from the U.S. Census Bureau, 13.1% of Portage County persons live in poverty. The comparable past poverty rate was 9.3% in 1999, 13.5% based on 2006-2010 data, 15.6% based on 2011-2015 data, 15.0% based on 2012-2016 data, and 14.5% based on 2013-2017 data. The rate of poverty was largely due to the loss of well-paying manufacturing jobs.

Based on June 2020 data, the Unemployment Rate for Ohio was 11.1% and for Portage County, it was 9.8%.

A study conducted by the Joint Center for Housing Studies of Harvard University in 2011 ranked the Akron Metropolitan area (Summit/Portage Counties) 6th in the nation as the "least affordable", based on the comparison of household income to the cost of living. The report cites that nearly a third of renters are paying more than half of their incomes for rent and utilities, which is significantly higher than the federally recommended maximum of 35% of income for housing costs (Ohio Department of Development, Office of Policy, Planning and Research).

The five most populated municipalities in Portage County include:

City	Population
Kent City	29,824
Streetsboro City	16,395
Aurora City	15,941
Ravenna City	11,552
Brimfield Township	10,378

History:

Portage Metropolitan Housing Authority was organized in 1968 by a group of local businessmen to provide rental assistance to Ravenna residents. Over the years, the remaining portion of Portage County was added to the Housing Authority's jurisdiction. PMHA is a political subdivision created by the state of Ohio and is governed by a five-member board of commissioners.

Presently, PMHA provides subsidized housing to low and moderate-income families and individuals. The agency operates two housing programs: the Public Housing program which consists of 303 units owned and managed by the agency, and the Section 8 program which entails the administration of a monthly subsidy paid to private landlord on behalf of a specific family or individuals. The Section 8 program provides assistance to approximately 1900 households/units in Portage County, which includes 1584 MTW households.

PMHA is the only Public Housing Authority (PHA) in Ohio that is currently part of the Moving To Work (MTW) demonstration. PMHA's MTW program began March 15, 1999. PMHA has participated in MTW since its inception. PMHA signed a Standard Agreement in 2008, extending its participation in MTW until the end of its 2018 fiscal year; however, in 2016, PMHA's participation in the demonstration was extended through year 2028.

Throughout its 50+ year history, PMHA has continued to be a proven leader and innovator in affordable housing and has earned the HUD designation of "High-Performer".



Portage Metropolitan Housing Authority

Board of Commissioners:

Thomas Sicuro, Board Chairman Jean Meadows, Board Vice-Chairman Scott Mikula, Commissioner John Thomas, Commissioner Michael Edwards, Resident Commissioner

Executive Director:

Pamela Nation Calhoun

PMHA Executive Leadership Team:

Amy Bower, Assistant Director
Pamela Crislip, Chief Financial Officer
Cindy Blevins, Housing Portfolio Manager
Marie Johnson, Section 8 Manager
Carolyn Budd, Special Programs Manager
Wes Ransom, Project Manager
Brandy Jones, Operations Manager
Zachary King, Asset Maintenance Manager

SECTION I: INTRODUCTION

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

Short-Term Goals (For Current Plan Year)

Portage Metropolitan Housing Authority established the following MTW goals and objectives for 2021:

- 1. Achieve and Maintain Excellence in Tenant-Based Housing Programs
 - Four households will become new homeowners through the Housing Choice Voucher Homeownership Program
- 2. Improve Productivity and Cost Effectiveness
 - Examine opportunities to improve productivity and cost effectiveness through technology
- 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.

<u>Long-Term Vision MTW Goals (Extending Through the Duration of the MTW Agreement)</u>

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

- 1. Integrating community services that will assist residents in continual economic improvement leading to either homeownership or private market housing.
- 2. 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, and
 - Removes systemic incentives for people to remain unemployed.

SECTION II: GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

ASSET MANAGEMENT PROJECT (AMP)		BE	DROC	M SIZ	TOTAL POPUL			# of Uniform Federal Accessibility Standards (UFAS) Units			y Standards
NAME AND NUMBER	0/1	2	3	4	5	6+	UNITS	TTPE	Fully Accessible	Adaptable	
East Side OH031000001	0	0	0	0	0	0	0	N/A	N/A	N/A	
West Side OH031000002	0	2	0	0	0	0	2	General	0	2	

Total Public Housing Units to be Added in the Plan Year 2

If "Population Type" is "Other" please describe:

N/A			

ii. Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
East Side OH031000001	0	N/A
West Side OH031000002	0	N/A

Total Public Housing Units to be Removed in the Plan Year

^{*} Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other

iii. Planned New Project Based Vouchers

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) will be in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
None	0	N/A	N/A

Planned Total Vouchers to be Newly Project-Based

iv. Planned Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Maple Grove III	6	Leased	No	One 2-BR, One 3-BR, & Four 4-BR units for families
Coleman Professional Services #1	9	Leased	No	Nine 1-BR units for disabled individuals
Coleman Professional Services #2	5	Leased	No	Five 1-BR units for disabled individuals
Family & Community Services #1	17	Leased	No	Sixteen 2-BR units & One 3-BR unit for families
Family & Community Services #2	10	Leased	No	Two 1-BR units & Eight 2-BR units for families
Family & Community Services #3	4	Leased	No	Four 2-BR units for families
Portage Housing III	3	Leased	No	Two 3-BR units & One 4-BR unit for families
Prospect House	26	Leased	No	Twenty-six 1-BR units for elderly
Family & Community Services #6	2	Leased	No	Two 1-BR units for individuals
Family & Community Services #5	2	Leased	No	One 2-BR unit & One 3-BR unit for families
Family & Community Services #4	4	Leased	No	One studio unit & Three 1-BR units for individuals
Coleman Professional Services #3	6	Leased	No	Four 1-BR units & Two 2-BR units for persons with disabilities
Streetsboro Family Homes	27	Leased	No	Twenty-three 3-BR units & Four 2-BR units for families
Harvest Rose Stage 1	17	Leased	No	Seventeen 2-BR units for elderly
Harvest Rose Stage 2	2	Leased	No	Two 2-BR units for elderly

Coleman Professional Services #4	10	Leased	No	Seven 1-BR units, Two 2-BR units, & One 3-BR unit for persons with disabilities
Coleman Professional Services #5	10	Leased	No	Ten 1-BR units for individuals with disabilities
Family & Community Services #7	4	Leased	No	Four 1-BR units for individuals with disabilities
Harvest Rose #4	2	Leased	No	Two 2-BR units for elderly
Coleman Professional Services #6	4	Leased	No	Two studio units & Two 1-BR units for disabled individuals
Family & Community Services PARC	22	Leased	No	Twenty-two SRO units for individuals with addiction-related disabilities
Family & Community Services Eagle	8	Leased	No	Eight 1-BR units for individuals with addiction-related disabilities
Family & Community Services #12	6	Leased	No	One studio unit & Five 1-BR units for individuals with addiction-related disabilities
Family & Community Services Kentway	21	Leased	No	Sixteen studio units & Five 1-BR units for elderly
Family & Community Services Kentway II	7	Leased	No	One studio unit & Six 1-BR units for elderly
Family & Community Services Kentway III	3	Leased	No	Two 1-BR units & One 2-BR unit for elderly
Coleman Professional Services #7	11	Leased	No	Eleven 1-BR units for disabled individuals
Residential Resources for the Develop- mentally Challenged -aka- Brady Lake	8	Leased	No	Eight SRO units for individuals with disabilities
Prospect House #3	8	Leased	No	Eight 1-BR units for the elderly
Coleman Professional Services #7	4	Leased	No	Three 1-BR units & One 2-BR unit for disabled individuals
Family & Community Services #14	1	Leased	No	One 2-BR unit for elderly
Family & Community Services #15	4	Leased	No	Four 2-BR units for families
The Wilds at Harvest Rose	23	Leased	No	Five 1-BR units & Eighteen 2-BR units for elderly

296

Planned Total Existing Project-Based Vouchers

v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

^{*} Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR

PMHA will continue to explore potential purchases of two (2) properties to replace the Willow Street Public Housing units that were previously acquired by Kent State University.

vi. General Description of All Planned Capital Expenditures During the Plan Year

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR

Amp1-OH031000001: Cabinets and Countertops Renaissance, \$65,000.00

Interior Closet Doors PHA Wide \$56,351.75

Renaissance Bath Vanities, Toilets, Tub Surrounds \$92,145.00

Amp2-OH031000002: Athena Gardens Siding Gutters Downspouts, storm doors, shutters \$150,000.00

B. LEASING INFORMATION

i. Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	3540	295
MTW Housing Choice Vouchers (HCV) Utilized	17,808	1484
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	0	0
Local, Non-Traditional: Homeownership^	0	0
	21,348	1779

Planned Total Households Served

*	"Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA plans to have
	leased/occupied in each category throughout the full Plan Year

- ** "Planned Number of Households to be Served" is calculated by multiplying the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year.
- ^ 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 MTW PHA should estimate the number of households to be served.

LOCAL, NON- TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*	
Tenant-Based	N/A	0	0	
Property-Based	N/A	0	0	
Homeownership	N/A	0	0	

- * The sum of the figures provided should match the totals provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.
- ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	None
MTW Housing Choice Voucher	None
Local, Non-Traditional	N/A

C. WAITING LIST INFORMATION

i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Section 8 MTW	Voucher waiting list for Section 8 and Mainstream programs	1389	Projected to close prior to 2021	No
Public Housing MTW	Waiting list for Public Housing units	2119	Open	Will remain open
Mod Rehab	Waiting list for Moderate Rehabilitation units in Portage Woods	2560	Open	Will remain open
HUD-VASH	Not a waiting list; PMHA receives referrals from the VA	N/A	N/A	N/A
Shelter Plus Care	Not a waiting list; PMHA receives referrals through CoC centralized database	N/A	N/A	N/A

Please describe any duplication of applicants across waiting lists:

Applicants may apply for Section 8 MTW, Public Housing MTW, and Mod Rehab waiting lists and appear on these lists simultaneously.

ii. Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
N/A	No anticipated changes

SECTION III: PROPOSED MTW ACTIVITIES

B-13 <u>Self-Certification as Highest Form of Income Verification</u>

- A. Activity Description:
 - i. Describe the proposed activity.

As per PMHA's MTW 2021 Annual Plan, effective January 1, 2021 PMHA was approved to waive the requirement to use the HUD system of income verification hierarchy when verifying certain types of income and allowed PMHA to consider self-certification as the highest form of income verification for annual and interim reexaminations in both the HCV and Public Housing programs. Currently, the specific types of income permitted to be self-certified are: employment income, child support for which no court order exists, in-kind income, miscellaneous income (i.e. handyperson jobs, mowing, babysitting, cleaning, and other similar odd jobs), TANF benefits (given that the amount self-certified is consistent with the amount specified by the State for the household size), zero income status, and asset balance. The self-certification is obtained verbally or in written format from the program participant, and PMHA staff uses the self-certification, cross-checked with the EIV income report, to determine the dollar amount of a participant's income for rent calculation purposes.

PMHA proposes to amend this activity to allow PMHA to waive the requirement to use the HUD system of income verification hierarchy described by Notice PIH 2018-18 when verifying all types of income and allow PMHA to forgo third-party income verification requirements, except for the use of EIV. PMHA proposes to allow self-certification to serve as the highest form of income verification for all types of income, to process new admissions and to process annual and interim reexaminations in both the HCV and Public Housing programs. This may occur over the telephone and be documented by PHA staff with a contemporaneous written record, through an email or postal mail with a self-certification form by the tenant, or through other electronic communications. PMHA will incorporate procedures to remind families of the obligation to provide true and complete information. PMHA will be responsible for addressing any material discrepancies (i.e., unreported income or a substantial difference in reported income) that may arise from review of EIV in connection with the recertification, as well as any material discrepancies that may arise later from any source, and likewise PMHA will take enforcement action in accordance with our policies and procedures.

PMHA staff will be responsible for obtaining the EIV income report and determining if there are any discrepancies between the report and what was self-certified by the program participant. If any discrepancies are found, PMHA will require additional income verification to be provided or obtained for review, such as pay stubs, third party income verification, child support agreements, and/or 1099s, W-2s, and Federal tax return documents. PMHA staff also will be responsible for addressing any material income discrepancies that may arise later.

This activity will not be used for HCV and Public Housing program applicants who are processing for initial eligibility, or for other circumstances where eligibility for a new HCV voucher is required (i.e. unit changes).

ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

The proposed activity would result in an impact on "Cost Effectiveness", as a result of agency cost savings from staff time savings and a decrease in error rate of task execution.

iii. Provide the anticipated schedules for implementing the proposed activity.

PMHA proposes to implement the initiative upon approval of the Plan.

- B. Activity Metrics Information:
 - i. Provide the metrics from the "Standard HUD Metrics" section that are applicable to the proposed activity.
 - ii. Give the baseline performance level for each metric (a numeric value) prior to the implementation of the proposed activity.
 - iii. Give the annual benchmark for each metric (a numeric value).
 - iv. If applicable, give the overall and/or long-term benchmark(s) for each metric (a numeric value).

Housing Choice Voucher Program - Reexams

CE#1: Agency Cost Savings			
Unit of	Baseline Page 1	Benchmark	
Measurement			
Total cost of task in	Cost of task prior to	Expected Cost of task	
dollars (decrease)	implementation of the	after implementation of	
	activity (in dollars)	the activity (in dollars)	
	\$106,571 for reexams	\$26,651 for reexams	
	(6814 hours x \$15.64	(1704 hours x \$15.64	
	avg. pay rate)	avg. pay rate)	
		_	

CE#2: Staff Time Savings			
Unit of	<mark>Baseline</mark>	<mark>Benchmark</mark>	
Measurement			
Total time to	Total amount of staff	Expected amount of	
complete the task	time dedicated to the	staff time dedicated to	
<mark>in staff hours</mark>	task prior to	the task after	
(decrease)	implementation of the	implementation of the	
	activity (in hours)	activity (in hours)	
	6814 hours annually	1704 hours annually for	
	for reexams	<mark>reexams</mark>	
	(2 hours per reexam x	(0.5 hours per reexam x	
	3407 reexams)	<mark>3407 reexams)</mark>	

CE#3: Decrease in Error Rate of Task Execution			
Unit of	<mark>Baseline</mark>	Benchmark Penchmark	
Measurement			
Average error rate	Expected average	Expected average error	
in completing a task	error rate of task prior	rate of task after	
as a percentage	to implementation of	implementation of the	
(decrease)	the activity	activity (percentage)	
	(percentage)		
	5% for reexams	2% for reexams	

Housing Choice Voucher Program – New Admissions

CE#1: Agency Cost Savings			
Unit of	<mark>Baseline</mark>	<mark>Benchmark</mark>	
Measurement			
Total cost of task in	Cost of task prior to	Expected Cost of task	
dollars (decrease)	implementation of the	after implementation of	
	activity (in dollars)	the activity (in dollars)	
	\$6577 for new	\$2198 for new	
	admissions and a second	<mark>admissions</mark>	
	(407 hours x \$16.16	(136 hours x \$16.16 avg.	
	avg. pay rate)	pay rate)	

CE#2: Staff Time Savings				
Unit of	<mark>Baseline</mark>	<mark>Benchmark</mark>		
Measurement				
Total time to	Total amount of staff	Expected amount of		
complete the task	time dedicated to the	staff time dedicated to		
<mark>in staff hours</mark>	task prior to	the task after		
(decrease)	implementation of the	implementation of the		
	activity (in hours)	activity (in hours)		
	407 hours annually for	136 hours annually for		
	new admissions	new admissions		
	(1.5 hours per new	(0.5 hours per new		
	admission x 271 new	admission x 271 new		
	admissions)	admissions)		

CE#3: Decrease in Error Rate of Task Execution			
Unit of	<mark>Baseline</mark>	<mark>Benchmark</mark>	
Measurement			
Average error rate	Expected average	Expected average error	
in completing a task	error rate of task prior	rate of task after	
as a percentage	to implementation of	implementation of the	
(decrease)	the activity	activity (percentage)	
(percentage)			
	5% for new admissions	2% for new admissions	

Public Housing Program - Reexams

CE#1: Agency Cost Savings			
Unit of	Baseline Baseline	Benchmark	
Measurement			
Total cost of task in	Cost of task prior to	Expected Cost of task	
dollars (decrease)	implementation of the	after implementation of	
	activity (in dollars)	the activity (in dollars)	
	\$20,153 for reexams	\$5038 for reexams	
	(1124 hours x \$17.93	(281 hours x \$17.93 avg.	
	avg. pay rate)	pay rate)	

CE#2: Staff Time Savings			
<mark>Unit of</mark>	<mark>Baseline</mark>	<mark>Benchmark</mark>	
Measurement			
Total time to	Total amount of staff	Expected amount of	
complete the task	time dedicated to the	staff time dedicated to	
in staff hours	task prior to	the task after	
(decrease)	implementation of the	implementation of the	
	activity (in hours)	activity (in hours)	
	1124 hours annually	281 hours annually for	
	for reexams	<mark>reexams</mark>	
	(2 hours per reexam x	(0.5 hours per reexam x	
	562 reexams)	<mark>562 reexams)</mark>	

CE#3: Decrease in Error Rate of Task Execution			
Unit of	<mark>Baseline</mark>	<mark>Benchmark</mark>	
Measurement			
Average error rate	Expected average	Expected average error	
in completing a task	error rate of task prior	rate of task after	
as a percentage	to implementation of	implementation of the	
(decrease)	the activity	activity (percentage)	
	(percentage)		
	5% for reexams	2% for reexams	

Public Housing Program – New Admissions

CE#1: Agency Cost Savings			
Unit of	<mark>Baseline</mark>	<mark>Benchmark</mark>	
Measurement			
Total cost of task in	Cost of task prior to	Expected Cost of task	
dollars (decrease)	implementation of the	after implementation of	
	activity (in dollars)	the activity (in dollars)	
	\$1309 for new	\$436 for new admissions	
	<mark>admissions</mark>		
		(27 hours x \$16.16 avg.	
	(81 hours x \$16.16	pay rate)	
	avg. pay rate)		

CE#2: Staff Time Savings		
<mark>Unit of</mark>	<mark>Baseline</mark>	Benchmark Benchmark
Measurement		
Total time to	Total amount of staff	Expected amount of
complete the task	time dedicated to the	staff time dedicated to
<mark>in staff hours</mark>	task prior to	the task after
(decrease)	implementation of the	implementation of the
	activity (in hours)	activity (in hours)
	81 hours annually for	27 hours annually for
	new admissions	new admissions
	(1.5 hours per new	(0.5 hours per new
	admission x 54 new	admission x 54 new
	admissions)	admissions)

CE#3: Decrease in Error Rate of Task Execution		
Unit of	<mark>Baseline</mark>	<mark>Benchmark</mark>
Measurement		
Average error rate	Expected average	Expected average error
in completing a task	error rate of task prior	rate of task after
as a percentage	to implementation of	implementation of the
(decrease)	the activity	activity (percentage)
	(percentage)	
	5% for new admissions	2% for new admissions

- v. Give the data source from which the metric data will be compiled.
 - Financial Reports and Data
 - Management System Reports
 - Departmental Data Tracking

C. Cost Implications:

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

The proposed activity will result in positive cost implications for PMHA, due to decreases in staff time for the income verification process.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.

This activity is expected to provide a cost savings to PMHA, which will then be reinvested into staff efficiencies and accuracy. It is estimated that this activity will generate a cost savings of approximately \$90,282 per year. These funds for staff salary, which are currently spent on staff time allocated to the income verification process, will be

reallocated into staff salary for their time spent on comprehensive self-audits and peer audits of files, in order to reduce staff error rates, as well as for program participant outreach activities and Public Housing property management activities.

- D. Need/Justification for MTW Flexibility:
 - Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

Attachment C, Section C(4): The Agency is authorized to restructure the initial, annual and interim review process in the public housing program in order to affect the frequency of the reviews and the methods and process used to establish the integrity of income information provided. In addition, the Agency is expressly authorized to adopt a local system of income verification in lieu of the current HUD system. For example, the Agency may implement alternate time frames for validity of verification or adopt policies for verification of income and assets through sources other than those allowed under the 1937 Act.

Attachment C, Section D(1)(c): The Agency is authorized to define, adopt and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations.

Attachment C, Section D(3)(b): The Agency is authorized to adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility that differs from the current mandated program requirements in the 1937 Act and its implementing regulations.

ii. Explain why the cited authorization(s) is needed to engage in this activity.

MTW flexibility is needed in order to waive certain provisions of Sections 3(a)(1) and 3(a)(2) of the 1937 Act and 24 CFR 966.4 and 960.257, as necessary to implement the Agency's Annual MTW Plan.

MTW flexibility also is needed in order to waive certain provisions of Section 8(o)(5) of the 1937 Act and 24 CFR 982.516, as necessary to implement the Agency's Annual MTW Plan.

MTW flexibility is need in order to waive certain provisions of 24 CFR 982.516 and 982 Subpart E, as necessary to implement the Agency's Annual MTW Plan.

B-14 <u>Change in Social Security and Supplemental Security Income (SSI)</u> <u>Processing</u>

A. Activity Description:

i. Describe the proposed activity.

Under this proposal, annual Social Security and SSI Cost-of-Living Adjustments (COLA) that result in an increase in a program participant's income will not be processed until the household's next annual reexamination effective date. Program participants will not be required to report this income to PMHA until the household's annual reexamination.

This activity will not be used for HCV and Public Housing program applicants who are processing for initial eligibility, or for other circumstances where eligibility for a new HCV voucher is required (i.e. unit changes).

ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

The proposed activity would result in an impact on "Cost Effectiveness", as a result of agency cost savings from staff time savings and a decrease in error rate of task execution.

iii. Provide the anticipated schedules for implementing the proposed activity.

PMHA proposes to implement the initiative upon approval of the Plan.

B. Activity Metrics Information:

- vi. Provide the metrics from the "Standard HUD Metrics" section that are applicable to the proposed activity.
- vii. Give the baseline performance level for each metric (a numeric value) prior to the implementation of the proposed activity.
- viii. Give the annual benchmark for each metric (a numeric value).
- ix. If applicable, give the overall and/or long-term benchmark(s) for each metric (a numeric value).

Housing Choice Voucher Program

CE#1: Agency Cost Savings		
Unit of	Baseline	Benchmark
Measurement		
Total cost of task in	Cost of task prior to	Expected Cost of task
dollars (decrease)	implementation of the	after implementation of
	activity (in dollars)	the activity (in dollars)
	\$10,289	\$0
	(669 hours x \$15.38 avg. pay rate)	(0 hours x \$15.38 avg. pay rate)

CE#2: Staff Time Savings		
Unit of	Baseline	Benchmark
Measurement		
Total time to	Total amount of staff	Expected amount of
complete the task	time dedicated to the	staff time dedicated to
in staff hours	task prior to	the task after
(decrease)	implementation of the	implementation of the
	activity (in hours)	activity (in hours)
	669 hours annually	0 hours annually
	(0.75 hours per household x 892 households)	(0 hours per household x 892 households)

CE#3: Decrease in Error Rate of Task Execution		
Unit of	Baseline	Benchmark
Measurement		
Average error rate in completing a task	Expected average error rate of task prior	Expected average error rate of task after
as a percentage	to implementation of	implementation of the
(decrease)	the activity (percentage)	activity (percentage)
	64%	2%

Public Housing Program

CE#1: Agency Cost Savings		
Unit of	Baseline	Benchmark
Measurement		
Total cost of task in	Cost of task prior to	Expected Cost of task
dollars (decrease)	implementation of the	after implementation of
	activity (in dollars)	the activity (in dollars)
	\$1,566	\$0
	(87 hours x \$18.00 avg. pay rate)	(0 hours x \$18.00 avg. pay rate)

CE#2: Staff Time Savings		
Unit of	Baseline	Benchmark
Measurement		
Total time to	Total amount of staff	Expected amount of
complete the task	time dedicated to the	staff time dedicated to
in staff hours	task prior to	the task after
(decrease)	implementation of the	implementation of the
	activity (in hours)	activity (in hours)
	87 hours annually	0 hours annually
	(0.75 hours per	(0 hours per household x
	household x 116	116 households)
	households)	

CE#3: Decrease in Error Rate of Task Execution		
Unit of	Baseline	Benchmark
Measurement		
Average error rate	Expected average	Expected average error
in completing a task	error rate of task prior	rate of task after
as a percentage	to implementation of	implementation of the
(decrease)	the activity	activity (percentage)
	(percentage)	
	57%	2%

- x. Give the data source from which the metric data will be compiled.
 - Financial Reports and Data
 - Management System Reports
 - Departmental Data Tracking

C. Cost Implications:

iii. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

The proposed activity will result in positive cost implications for PMHA, due to decreases in staff time for verification of income and processing interim reexaminations.

iv. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.

This activity is estimated to generate an increase of approximately \$\$11,855 per year. PMHA plans to reinvest these cost savings into staff efficiencies and accuracy. These funds, which are currently used for staff salary for time spent verifying income and processing interim reexaminations, will be reallocated into staff salary for their time spent on comprehensive self-audits and peer audits of files, as well as program participant outreach activities and Public Housing property management activities.

- D. Need/Justification for MTW Flexibility:
 - iii. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

Attachment C, Section C(4): The Agency is authorized to restructure the initial, annual and interim review process in the public housing program in order to affect the frequency of the reviews and the methods and process used to establish the integrity of income information provided. In addition, the Agency is expressly authorized to adopt a local system of income verification in lieu of the current HUD system. For example, the Agency may implement alternate time frames for validity of verification or adopt policies for verification of income and assets through sources other than those allowed under the 1937 Act.

Attachment C, Section D(1)(c): The Agency is authorized to define, adopt and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations.

iv. Explain why the cited authorization(s) is needed to engage in this activity.

MTW flexibility is needed in order to waive certain provisions of Sections 3(a)(1) and 3(a)(2) of the 1937 Act and 24 CFR 966.4 and 960.257, as necessary to implement the Agency's Annual MTW Plan.

MTW flexibility also is needs in order to waive certain provisions of Section 8(o)(5) of the 1937 Act and 24 CFR 982.516, as necessary to implement the Agency's Annual MTW Plan.

SECTION IV: APPROVED MTW ACTIVITIES

A. IMPLEMENTED ACTIVITIES

HOUSING CHOICE VOUCHER PROGRAM

HCV-1 Restrict portability moves out of Portage County for the Housing Choice Voucher Program

Plan Year Approved: 2009

Implemented: 2010 Amended: N/A

Description/Update: PMHA approves portability only to housing authorities who absorb the incoming family, or administer Fair Market Rents at or below the amounts applicable to Portage County. This restriction does not apply to portability moves from Portage County that are justified under laws and regulations applicable to the federal Violence Against Women Act and support reasonable accommodations for disability.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

HCV-2 <u>MTW Homeownership Voucher Program</u>

Plan Year Approved: 1999

Implemented: 2000 Amended: 2010

Description/Update: PMHA identifies families with homeownership as one of their goals, screens the family for eligibility, provides the family with referrals to organizations that assist in overcoming barriers to homeownership, and applies a homeownership assistance payment to monthly mortgage payments of participants who purchase a home under the program. PMHA will continue to expand the MTW homeownership program on an ongoing basis.

In 2010, this activity was amended to include households who are presently homeowners and under foreclosure, to receive assistance with resolving issues with bank/mortgage companies seeking foreclosure and including homeownership assistance payments.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

HCV-3 <u>Initial rent burden cap of 50% of adjusted monthly income</u>

Plan Year Approved: 1999

Implemented: 2000 Amended: 2014, 2017

Description/Update: PMHA offers HCV participants to utilize an initial rent burden of 50% of households' monthly income as an effort to maximize housing choice and maintain a level of affordability.

In 2014, 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. In 2017, due to negative impact on Section 8 tenants who had difficulties paying higher rent, PMHA re-implemented the original initial rent burden cap of 50% of households' monthly income.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

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

Plan Year Approved: 1999

Implemented: 2002 Amended: 2009, 2019

Description/Update: 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.

In 2009, PMHA was granted additional authorizations for the project-based voucher program. PMHA has continued to offer project-based Section 8 assistance to nonprofit organizations and developers to build or rehabilitate properties, in order to increase the supply of rental units available to assist special needs populations in obtaining suitable housing.

In 2019, PMHA was granted additional authorizations for this activity, to allow for changes to be made to the terms of project-based Agreements to enter into Housing Assistance Payments (AHAP) contracts for newly constructed or rehabilitated housing, after the AHAPs have already been signed, contingent upon agreement by the project owner and PMHA; specifically, these changes include, but are not be limited to, changing the date(s) that units are to be brought online, and changing a single-stage project to a multi-stage project, to allow for units that are ready to come online ahead of schedule to be put under HAP contract and filled as soon as the units are completed and determined eligible.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

HCV-5 Alternative Housing Quality Standards Compliance

Plan Year Approved: 2011

Implemented: 2011 Amended: N/A

Closed Out: 2014

Refer to Section D. Closed Out Activities.

HCV-6 <u>Time Limits for Housing Choice Voucher Participants</u>

Plan Year Approved: 2013

Implemented: 2014 Amended: N/A

Closed Out: 2017

Refer to Section D. Closed Out Activities.

HCV-7 Capped Utility Reimbursement Checks

Plan Year Approved: 2012

Implemented: N/A Amended: N/A

Closed Out: 2017

Refer to D. Closed-Out Activities.

HCV-8 Transitional Housing Vouchers

Plan Year Approved: 2012

Implemented: 2012 Amended: N/A

Amended. N/A

Closed Out: 2017

Refer to D. Closed-Out Activities.

HCV-9 Elimination of Deductions in Total Tenant Payment Calculations

Plan Year Approved: 2014

Implemented: 2015 Amended: N/A

Description/Update: PMHA calculates total tenant payments and bases Housing Choice Voucher assistance for all households on a calculation that is 29.6% of gross monthly income and eliminates 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. This activity reduces the HAP expense.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

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

Plan Year Approved: 2014

Implemented: 2014 Amended: 2015-2016

Refer to C. Activities on Hold.

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

Plan Year Approved: 2014

Implemented: 2014 Amended: N/A

Description/Update: This activity permits 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.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

HCV-12 <u>Use Lesser of Actual Unit Size or Unit Size of Voucher Issued for Utility</u> <u>Allowances</u>

Plan Year Approved: 2014

Implemented: N/A Amended: N/A

Closed Out: 2014

Refer to Section D. Closed Out Activities.

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

Plan Year Approved: 2014

Implemented: 2014 Amended: N/A

Description/Update: PMHA extends the period of time that a \$0 HAP family may be considered a Housing Choice Voucher participant household from the 6 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.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

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

Plan Year Approved: 2014

Implemented: N/A

Refer to B. Not Yet Implemented Activities.

HCV-15 <u>Change the Allocation of Interest Earned for the Housing Choice Voucher</u> Family Self-Sufficiency Program

Plan Year Approved: 2014

Implemented: 2015 Amended: N/A

Description/Update: PMHA no longer applies 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 to the Housing Choice Voucher funds. Minimal staff time savings also will result.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

HCV-16 Incentive for New Landlords

Plan Year Approved: 2019

Implemented: 2019 Amended: N/A

Description/Update: PMHA operates in a rental market with an ongoing stigma related to HCV participants; therefore, PMHA offers an incentive for new landlords to participate in PMHA's MTW tenant-based HCV program. This incentive provides the new landlord a one-time additional incentive Housing Assistance Payment (HAP) of \$200.00 upon the execution of the HAP contract for the MTW tenant-based HCV participant. A new landlord is defined as a landlord who has not rented to a voucher holder within the past two (2) years. A landlord is not eligible for the \$200.00 incentive HAP payment if the contract is executed for a transfer of units with the same landlord, or if the contract is executed due to a lease renewal or change. Additionally, properties owned or managed by PMHA or any other PHA are ineligible from the incentive HAP payment.

PMHA continues to develop a pool of potential new owners to poll or consult regarding the incentive. PMHA also polls all new owners to determine if the \$200.00 HAP payment is an incentive in their decisions to rent to HCV participants. In 2021, PMHA will consider making adjustments in incentive amount accordingly. Additionally, PMHA will consider adding a damage claim policy to this activity once additional potential new landlords are polled and the results are analyzed.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

HCV-17 <u>Protecting Tenants Living in Foreclosed Rental Properties</u>

Plan Year Approved: 2020

Implemented: 2020 Amended: N/A

Description/Update: This activity protects renters who are living in foreclosed rental properties. PMHA provides tenant-based vouchers and rental assistance to those who were living in rental properties that have gone through foreclosure and are currently owned by the Portage County Land Bank. This activity is expected to preserve housing units for households who would otherwise be displaced or their rental units not available to them due to the housing costs. The program size will not exceed twenty-four (24) eligible participants in eligible units.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

PUBLIC HOUSING PROGRAM

PH-1 Escalating Minimum Rent

Plan Year Approved: 2008

Implemented: 2008 Amended: N/A

Closed-Out: 2011

Refer to D. Closed-Out Activities.

PH-2 Maximum Rent

Plan Year Approved: 2009

Implemented: 2009 Amended: N/A

Description/Update: The Maximum Rent activity 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 conducted biennially for these households. Households will have no time limit for ceiling rents, except for the over-income limitations set forth by the Housing Opportunity Through Modernization Act of 2016 (HOTMA).

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

PH-3 Elderly and Disabled Rent Re-certifications Biennially

Plan Year Approved: 2000

Implemented: 2000 Amended: N/A

Closed-Out: 2014

Refer to D. Closed-Out Activities.

PH-4 Change in Employment Income

Plan Year Approved: 2008

Implemented: 2012 Amended: N/A

Description/Update: 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.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

PH-5 Rent Adjustment for Income Decreases

Plan Year Approved: 2009

Implemented: 2009 Amended: N/A

Description/Update: Decreases in income of 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.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

PH-6 Overall Percentage of Income Amounts for Rent Calculations

Plan Year Approved: 2012

Implemented: 2012 Amended: N/A

Closed Out: 2018

Refer to D. Closed-Out Activities.

PH-7 <u>Eliminate Allowance for Non-Reimbursed Childcare Expenses</u> Comment and Replace with 4% Overall percentage of earned income

Plan Year Approved: 2012 Implemented: April 1, 2012

Amended: N/A

Closed Out: 2018

Refer to D. Closed-Out Activities.

PH-8 Deduction for Elderly or Disabled Adults

Plan Year Approved: 2009

Implemented: N/A Amended: N/A

Closed-Out: 2014

Refer to D. Closed-Out Activities.

PH-9 Providing Transitional Housing

Plan Year Approved: 1999

Implemented: 1999

Amended: N/A

Closed-Out: 2012

Refer to D. Closed Out Activities.

PH-10 PMHA to Operate Two Group Homes as Public Housing

Plan Year Approved: 2009

Implemented: 2009 Amended: N/A

Description/Update: PMHA currently operates two (2) group homes as Public Housing,

as follows:

1. **Walnut House**, located in Ravenna, houses persons with severe mental illnesses, in partnership with Coleman Professional Services. Coleman Professional Services provides on-site services to residents, including mental health services, daily living skills, and transportation. This property has 13 units of housing.

2. **Washington Group Home**, located in Ravenna Township, has a capacity for 8 individuals to reside in a supportive group home environment. PMHA entered into a partnership with Family and Community Services, Inc. (F&CS) to lease the building for the purposes of providing housing and services to men who are addressing alcohol and drug addiction issues. F&CS provides residents with comprehensive services to facilitate a successful transition back to community living. This project was finalized during the first half of 2013. The program has flourished and is well-received in the community.

Residents are not entered in PIC due to the nature of the specific population served. F&CS screens and selects eligible candidates for this program, known as ROOT. Thus, Standard HUD Metrics do not apply.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

PH-11 Deduction for Absent Child

Plan Year Approved: 2009

Implemented: N/A Amended: N/A

Closed-Out: 2013

Refer to D. Closed out Activities.

PH-12 Cap on Dependent Child Deduction

Plan Year Approved: 1999

Implemented: 2000 Amended: 2014

Closed Out: 2018

Refer to D. Closed-Out Activities.

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

Plan Year Approved: 2015

Implemented: 2016 Amended: N/A

Description/Update: 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.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

PH-14 Elimination of Deductions in Total Tenant Payment Calculations

Plan Year Approved: 2018

Implemented: 2018 Amended: N/A

Description/Update: PMHA calculates total tenant payments and bases Public Housing assistance for all households on a calculation that is 29.6% of gross monthly income and eliminates 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. This activity reduces the HAP expense.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

PH-15 <u>Scattered Site Transfers</u>

Plan Year Approved: 2020

Implemented: 2020 Amended: N/A

Description/Update: PMHA fills vacancies in Public Housing scattered single family and/or duplex sites by offering unit transfers to select current Public Housing families based on their household size and positive rental histories with PMHA. This activity ensures that families with positive rental histories with PMHA are given first choice to move into vacated scattered site units, which is expected to save on PMHA's costs for staff time and expenses incurred to turn over units between tenancies.

PMHA maintains a formal waiting list of Public Housing residents who are eligible for the bedroom size of the unit available and who meet the following rental history criteria:

- Have been Public Housing residents for at least 12 months,
- Have zero housekeeping violations in the last 12 months,
- Have zero substantiated neighbor complaints in the last 24 months, and
- Have a timely rent payment history for the last 12 months (no 3-day notices issued for late payment and/or non-payment of rent).

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

BOTH HOUSING CHOICE VOUCHER AND PUBLIC HOUSING PROGRAMS

B-1 <u>Exclusions of Overtime, Bonuses and Income from Assets</u>

Plan Year Approved: 1999

Implemented: 2000 Amended: 2012

Description/Update: 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.

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

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

B-2 Cap on dependent child deduction

Plan Year Approved: 1999

Implemented: 2000 Amended: N/A

Closed Out: 2014 (for HCV), 2018 (Public Housing)

Refer to D. Closed-Out Activities.

B-3 <u>Utility Allowance Payments are used to repay participant debts owed to the</u> Housing Authority

Plan Year Approved: 2009

Implemented: 2010 Amended: N/A

Description/Update: PMHA withholds 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.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

B-4 <u>Pro-ration of the utility allowance schedule up to the percentage of pro-ration of funding as established by HUD due to appropriations</u>

Plan Year Approved: 2009

Implemented: 2014 (Public Housing Program only); Refer to Section B. Not Yet

Implemented Activities for HCV Program.

Amended: N/A

Description/Update: 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. This feature was not utilized from 2017 through 2020, but it will be reviewed for possible Public Housing utilization and HCV implementation in the future.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

B-5 Single Fund Budget Flexibility

Plan Year Approved: 2009

Implemented: 2013 Amended: N/A

Closed Out: 2014

Refer to D. Closed out Activities.

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

Plan Year Approved: 2009

Implemented: N/A Amended: N/A

Closed Out: 2014

Refer to D. Closed out Activities.

B-7 Employment and education deductions

Plan Year Approved: 1999

Implemented: 2000 Amended: N/A

Closed Out: 2012 (Public Housing), 2015 (HCV)

Refer to D. Closed-Out Activities.

B-8 Adoption of Local Investment Policies

Plan Year Approved: 2014

Implemented: N/A

Refer to B. Not Yet Implemented Activities.

B-9 <u>Verifications of Income Valid for 180 Days</u>

Plan Year Approved: 2014

Implemented: 2014 Amended: N/A

Description/Update: PMHA extends the length of time for verified application data to be considered valid to 180 days. This activity reduces costs and achieves greater cost effectiveness in Federal expenditures. It also reduces the amount of duplicative work caused by various factors in validating all needed information provided at the time of a completed application and process from the wait list.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

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

Plan Year Approved: 2014

Implemented: 2014 Amended: N/A

Refer to C. Activities on Hold.

B-11 Elderly and Disabled Rent Re-certifications Every Three Years

Plan Year Approved: 2014

Implemented: 2014 Amended: N/A

Refer to C. Activities on Hold.

B-12 Offender Re-Entry Initiative

Plan Year Approved: 2020

Implemented: 2020 Amended: N/A

Description/Update: This activity provides housing assistance to up to 150 eligible participants who were incarcerated, involved in drug court and/or court-ordered diversion programs, and/or released from in-patient treatment within the past twelve (12) months,

and are seeking affordable housing upon re-entry into the community. The goal of this activity is to provide an immediate impact for offenders coming out of prison and/or treatment facilities, who are in need of housing and supportive services, and who would otherwise be left homeless and without services needed for successful reintegration into the community.

All eligible participants must be referred to PMHA by its re-entry program partner, Portage County Adult Probation, and are either reuniting with a qualifying family member currently participating in PMHA's Section 8 program or Public Housing Program, or referred to PMHA for a Section 8 MTW tenant-based voucher under the re-entry program, or referred to PMHA for an emergency short-term stay of approximately 30 days at a dedicated PMHA-owned non-Public Housing unit (or a PMHA-owned Public Housing unit, should this be more feasible) while seeking permanent housing through the program's Section 8 MTW tenant-based voucher option, or an applicant on the PMHA Section 8 waiting list who otherwise would be denied for criminal activity, but who is currently involved with Portage County Adult Probation, meets all eligibility requirements for the program when he/she is selected for processing (in the existing waiting list order), and is recommended for participation in the program by Portage County Adult Probation.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

B. NOT YET IMPLEMENTED ACTIVITIES

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

Plan Year: 2014

Description/Update: This activity allows PMHA to change 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 recertification), rather than be implemented at the second annual recertification following the change. Under present regulations, housing authorities may not lower payment standards until the 2nd annual recertification 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 would allow PMHA to be 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 remained on hold through 2020 and will be reviewed for possible implementation in 2021.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

B-4 <u>Pro-ration of the utility allowance schedule up to the percentage of pro-ration</u> of funding as established by HUD due to appropriations

Plan Year: 2009

Description/Update: 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. This activity was implemented in 2014 for the Public Housing Program. Although this feature was not utilized in 2017 through 2019, it will be reviewed for possible Public Housing utilization in 2020.

For the HCV Program, this activity remained on hold since inception through 2020 and will be reviewed for possible implementation in 2021.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

B-8 Adoption of Local Investment Policies

Plan Year: 2014

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

PMHA has not implemented new local investment policies; however, this activity will be reviewed for possible implementation in 2021.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

C. ACTIVITIES ON HOLD

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

Plan Year Approved: 2014

Implemented: 2014 Amended: 2015-2016

Description/Update: PMHA would conduct reviews of income at least once every 24 months as opposed 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".

This activity was expected to simplify income verifications, saving time for PMHA staff, participants and other agencies. PMHA anticipated this activity would reduce the costs of annual re-certifications for the program. Although time and cost savings resulted, these savings were negated by additional administrative burden imposed on other staff to monitor and track households and recertification schedules, to calculate debt resulting from household non-reporting, and to troubleshoot management systems issues related to limited tracking capabilities. Additionally, the implementation of activity HCV-9 is suspected to have contributed to the time and cost savings previously attributed to this activity.

This activity was on hold from May 2015 through April 2016, in order to identify eligible households and create a uniform timetable for re-certifications. The activity was reimplemented in May 2016.

This activity was put back on hold effective January 2019, due to administrative burden and issues with the management system tracking capabilities. This activity may be revisited once data is available to compare time and cost savings with implementation and without.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

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

Plan Year Approved: 2014

Implemented: 2014 Amended: N/A Description/Update: PMHA would cease verifying any fully excluded income sources for households. This activity is expected to simplify income verifications, saving time for PMHA staff, participants and other agencies.

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.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

B-11 Elderly and Disabled Rent Re-certifications Every Three Years

Plan Year Approved: 2014

Implemented: 2014 Amended: N/A

Description/Update: This activity allows PMHA to conduct re-certifications at least once every three years for elderly and disabled households.

This activity was expected to increases administrative efficiency and reduces costs to PHA programs through the reduction of annual re-certifications. Although time and cost savings resulted, the activity placed greater administrative burden on other staff to monitor and track households and recertification schedules, to calculate debt resulting from household non-reporting, and to troubleshoot management systems issues related to limited tracking capabilities. The implementation of activities HCV-9 and PH-14 created time and cost savings that reduced the need for this activity, while bringing to light the previously-overlooked struggles with properly managing this activity, and showed that it is no longer as effective as anticipated for the relief of administrative burden.

This activity was put on hold for HCV effective April 2019 and for Public Housing effective December 2019, due to administrative burden and issues with the management system tracking capabilities. This activity may be revisited once data is available to compare time and cost savings with implementation and without.

Planned Non-Significant Changes: None

Planned Changes to Metrics/Data Collection: None

Planned Significant Changes: None

D. CLOSED OUT ACTIVITIES

HCV-5 Alternative Housing Quality Standards Compliance

Plan Year Approved: 2011

Implemented: 2011 Amended: N/A

Closed out: 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-6 Time Limits for Housing Choice Voucher Participants

Plan Year Approved: 2013

Implemented: 2014 Amended: N/A

Closed out: 2017

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

This activity, as written, proved difficult to track and was prone to errors. No households were impacted by this activity since its full impact would have materialized in 2018.

HCV-7 Capped Utility Reimbursement Checks

Plan Year Approved: 2012

Implemented: N/A Amended: N/A

Closed out: 2017

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 of 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.

It was determined that the cost for software changes was not affordable for the value gained from the activity.

HCV-8 Transitional Housing Vouchers

Plan Year Approved: 2012

Implemented: 2012 Amended: N/A

Closed out: 2017

This activity provided a one-year voucher to families. Intensive supportive services were provided to participants, with an emphasis on employment and self-sufficiency. The voucher ended after one year and was not renewable.

Requests for transitional housing vouchers elapsed over the last three years this activity was in place. This was due to the service provider not accepting new program families and restrictions limiting the time for participation in the program.

HCV-12 <u>Use Lesser of Actual Unit Size or Unit Size of Voucher Issued for Utility</u> <u>Allowances</u>

Plan Year Approved: 2014

Implemented: N/A Amended: N/A

Closed out: 2014

PMHA applied 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 Approved: 2008

Implemented: 2008 Amended: N/A Closed out: 2011

PMHA established a schedule of minimum rents that started at \$25 per month and would

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 Approved: 2000

Implemented: 2000 Amended: N/A

Closed out: 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 was identified as Activity B-11.

PH-6 Overall Percentage of Income Amounts for Rent Calculations

Plan Year Approved: 2012

Implemented: 2012 Amended: N/A

Closed out: 2018

The percentage of earned income was set at 26% of income in an effort to promote work activity and offset the elimination of the allowance for non-reimbursed childcare expenses.

This activity was discontinued due to a revised rent-reform policy with a flat 29.6% of income calculation, known as Activity PH-14.

PH-7 Eliminate Allowance for Non-Reimbursed Childcare Expenses and Replace with 4% Overall percentage of earned income

Plan Year Approved: 2012

Implemented: 2012 Amended: N/A Closed out: 2018

Allowances for non-reimbursed child care expenses were eliminated from rent calculations in part of an overall rent reform that reduced the percentage of income counted towards rent for households with earned income. The purpose of this feature was to simplify rent calculations for transparency shared by both residents and PHA staff, as well as reduce administrative burden relating to documentation.

This activity was discontinued due to a revised rent-reform policy with a flat 29.6% of income calculation, known as Activity PH-14.

PH-8 Deduction for Elderly and Disabled Adults

Plan Year Approved: 2009

Implemented: N/A Amended: N/A

Closed out: 2014

PMHA was considering increasing the deduction from income from \$400 to a higher amount. 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 Approved: 1999

Implemented: 1999 Amended: N/A

Closed out: 2012

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

This program 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

Plan Year Approved: 2009

Implemented: N/A Amended: N/A

Closed out: 2013

PMHA discarded this activity as it became clear that there would be substantial administrative difficulties in implementing and maintaining the activity. The number of households that had split families, with 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.

PH-12 Cap on Dependent Child Deduction

Plan Year Approved: 1999

Implemented: 2000 Amended: 2014

Closed out: 2018

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

This activity was discontinued for Public Housing due to a revised rent-reform policy with a flat 29.6% of income calculation, known as Activity PH-14.

B-2 Cap on Dependent Child Deduction

Plan Year Approved: 1999

Implemented: 2000 Amended: 2014

Closed out: 2018

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

This activity was discontinued for Public Housing and closed out in 2018 due to a revised rent-reform policy with a flat 29.6% of income calculation, known as Activity PH-14.

B-5 Single Fund Budget Flexibility

Plan Year Approved: 2009

Implemented: 2009 Amended: N/A

Closed Out: 2014

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

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 it is no longer reported as such.

B-6 <u>Income Verifications Conducted for Approved Government Programs May</u> <u>Be Substituted for PMHA Income Verifications if Performed Within 90 Days</u>

Plan Year Approved: 2009

Implemented: N/A Amended: N/A

Closed Out: 2014

PMHA would use the information gathered and certified 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 diminished the willingness to exchange information with the Housing Authority.

B-7 Employment and Education Deductions

Plan Year Approved: 1999

Implemented: 2000 Amended: 2012

Closed out: 2015

PMHA discontinued this activity 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 and subsequently closed out.

SECTION V: SOURCES AND USES OF FUNDS

A. ESTIMATED SOURCES AND USES OF MTW FUNDS

i. Estimated Sources of MTW Funds

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$731,392
70600	HUD PHA Operating Grants	\$11,859,782
70610	Capital Grants	\$723,268
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$11,674
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$147,390
70000	Total Revenue	\$13,473,506

ii. Estimated Uses of MTW Funds

The MTW PHA shall provide the estimated uses and amount of MTW spending by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$2,501,256
91300+91310+92000	Management Fee Expense	\$611,259
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$8,344
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$319,952
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$939,931
95000 (95100+95200+95300+95500)	Total Protective Services	\$0
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$68,001
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$137,041
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$7,178
97300+97350	HAP + HAP Portability-In	\$8,880,760
97400	Depreciation Expense	\$524,598
97500+97600+97700+97800	All Other Expense	\$0
90000	Total Expenses	\$13,998,320

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:

The difference between revenue and expense is from depreciation expenses.

iii. Description of Planned Use of MTW Single Fund Flexibility

The MTW PHA shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

PMHA proposes to use the MTW Single-Fund Flexibility to combine its funding sources to form an MTW Block Grant that will be used to administer current and future MTW projects and activities, and support areas of need, such as operational expenses including salaries, capital fund projects, and housing assistance. PMHA plans to operate its Public Housing, Section 8 assistance and Capital Fund as a single fund budget with full flexibility.

Uses of MTW single fund flexibility include the following: Utilize MTW funds for extraordinary maintenance, enhanced security, and renovation/rehabilitation of PMHA-owned existing affordable housing; utilize savings achieved through MTW initiatives to over-lease and provide HCV assistance to more households than permissible under our HUD-established baseline; and to continue operations during any current and/or future government shutdown and/or emergencies declared by the Federal, State or local government .

D	$I \cap C \wedge I$	ACCET	$AAAAI \subset CA$	ΛFNT PLAN
_	11114	4 1 1 F I	IVIAINGTEN	AFINI PIAN

i. Is the MTW PHA allocating costs within statute?	Yes
ii. Is the MTW PHA implementing a local asset mana	ngement plan (LAMP)?
iii. Has the MTW PHA provide a LAMP in the appendi	
,	
iv. If the MTW PHA has provided a LAMP in the appe LAMP in the Plan Year or state that the MTW PHA	does not plan to make any changes in the Plan Year.
N/A	

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

i. Description of RAD Participation

The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

N/A - None

ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

No

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

N/A

SECTION VI: ADMINISTRATIVE

A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

The PMHA Board Resolution, the Certifications of Compliance (HUD Form 50900), and the Certifications by State or Local Officials of PHA Plans Consistency with the Consolidated Plan (form HUD-50077-SL) appear below.

Resolution No. 20-50 APPROVING 2021 MOVING TO WORK 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: 2021 Moving To Work Annual Plan HUD Form 50077, Certification of Compliance Passed by the PMHA September 30, 2020 PORTAGE METROPOLITAN HOUSING AUTHORITY BY: I, Pamela Nation Calhoun, Secretary of the Board of the PMHA, do hereby certify that the aforegoing is a true and correct copy of a Resolution of the PMHA duly adopted September 30, 2020, 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.

Board Resolution for Plan Amendment

Resolution No. 21-08

APPROVING THE AMENDMENT OF THE 2021 MOVING TO WORK 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 amendment to the 2021 Moving To Work Annual Plan following the public hearing process; and

WHEREAS, the Board of Portage Metropolitan Housing Authority has reviewed the proposed amendment and any 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 amendment of the 2021 MTW Plan as follows:

PMHA proposes to waive the requirement to use the HUD system of income verification hierarchy described by Notice PIH 2018-18 when verifying all types of income and allow PMHA to forgo third-party income verification requirements, except for the use of EIV. PMHA proposes to allow self-certification to serve as the highest form of income verification for all types of income, to process new admissions and to process annual and interim reexaminations in both the HCV and Public Housing programs. This may occur over the telephone and be documented by PHA staff with a contemporaneous written record, through an email or postal mail with a self-certification form by the tenant, or through other electronic communications. PMHA will incorporate procedures to remind families of the obligation to provide true and complete information. PMHA will be responsible for addressing any material discrepancies (i.e., unreported income or a substantial difference in reported income) that may arise from review of EIV in connection with the recertification, as well as any material discrepancies that may arise later from any source, and likewise PMHA will take enforcement action in accordance with our policies and procedures.

Passed by the PMHA May 25, 2021

PORTAGE METROPOLITAN HOUSING AUTHORITY

BY:

Chairman

Secretary

OMB Control Number: 2557-0216 Expiration Date: 01/31/2021

CERTIFICATIONS OF COMPLIANCE

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

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning 01/01/2021, hereinafter 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 MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

HUD FORM 50900: Certifications of Compliance

OMB Control Number: 2557-0216 Expiration Date: 01/31/2021

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

Portage Metropolitan Housing Authority MTW PHA NAME	OH031 MTW PHA NUMBER/HA CODE
I hereby certify that all the information stated herein, as well as herewith, is true and accurate. Warning: HUD will prosecute fal criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 L	se claims and statements. Conviction may result in
Thomas Sicuro	Board Chairman
NAME OF AUTHORIZED OFFICIAL	TITLE
VLore J. Area SIGNATURE	09/30/2020 DATE

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

HUD FORM 50900: Certifications of Compliance

25

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, <u>Todd Peetz, Director</u> of the <u>Portage County Regional Planning Commission</u> 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.

Hereby certify that all the information stated herein, as well as any information provided in the ac- prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18	companiment herewith, is true and accurate. Warning: HUD will U.S.C. 1001, 1010, 1012, 31 U.S.C. 3729, 3802)
Name of Authorized Official	Title
Todd Peetz	Director
Signature	7/3 u /2020

Page 1 of 1

form HUD-50077-SL (12/2014)

B. DOCUMENTATION OF PUBLIC PROCESS

Due to the COVID-19 pandemic, restrictions on in-person gatherings, and the Ohio Stay at Home Order, PMHA did not hold public meetings in April of this year, as were typically held in previous years, to develop and discuss ideas for the 2021 Annual Plan. Instead, surveys were mailed to all Public Housing residents, with the option to mail it back in, place it in the office drop box, or scan/photograph and email it to Carolyn Budd. The survey was also emailed to all residents for which PMHA had current email addresses, via Survey Monkey, and the link to the survey on Survey Monkey was put onto PMHA's website and social media pages (Facebook, Twitter and Instagram). Residents were invited to participate in the survey from April 27, 2020 through May 14, 2020. A total of 29 households participated in the survey. Records of all survey responses are kept at the PMHA main office.

The final draft of the 2021 MTW Plan was made available for public review on August 13, 2020 with a public hearing held on September 14, 2020.

PMHA utilizes existing PMHA staff members for collecting information for the purposes of evaluating MTW program activities, for reporting program results in the annual MTW Report to HUD, and for the purposes of planning and developing future MTW Plans. PMHA does not hire any independent outside evaluators to perform assessments of the activities or of the MTW program, as a whole.

Public Hearing Agenda



Portage Metropolitan Housing Authority

Public Hearing - 2021 Moving To Work Annual Plan

Monday, September 14, 2020 at 2:00 p.m.

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 2021
- V. New or Revised Goals and/or Activities
 - B-13 Self-Certification as Highest Form of Income Verification
 - B-14 Change in Social Security and SSI Processing
- VI. Other Issues / Questions
- VII. Adjournment

Public Hearing Minutes



Portage Metropolitan Housing Authority

Public Hearing - 2021 Moving To Work Annual Plan Monday, September 14, 2020 at 2:00 p.m.

2832 State Route 59, Ravenna, OH 44266

MINUTES

The Public Hearing convened virtually at 2:00 p.m. via the GoToMeeting platform, by Carolyn Budd, PMHA Special Programs Manager.

No other persons were in attendance. No verbal comments were made for recording. No written comments were submitted for review, and no issues were brought forward.

The meeting was adjourned at 2:16 p.m.

ll & mylora

Respectfully Submitted by:

Carolyn Budd

Special Programs Manager

Public Hearing Attendance Record



Attendance Sheet for the 2021 Moving To Work Annual Plan Public Hearing

Portage Metropolitan Housing Authority 2832 State Route 59, Ravenna OH 44266

Monday, September 14, 2020 at 2:00 p.m.

Registrant Name:	Phone Number, Email:	Registrant in Attendance? Yes or No during roll call
Christina	P: D.Com	No
Carolyn Budd CAMHA)	P: 330-297-1489 x 239 E: Chudde portage housing. 809	Yes

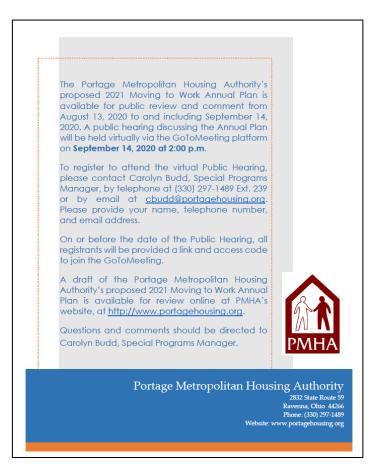
Classified Advertisement in the Record-Courier

Portage Metropolitan Housing Authority's 2021 Moving to Work Annual Plan is available for public review and comment from August 13, 2020 to and including September 14, 2020. A public hearing discussing the Annual Plan will be held at the PMHA office, 2832 State Route 59, Ravenna, Ohio on September 14, 2020 at 2:00 p.m. A copy of the 2021 Annual Plan is available upon request by e-mail to cbudd@portagehousing.org or at the office address listed above. -END-

Documentations of Public Notice, as published in newspaper and flyer format, are below:

Record-Courier, Kent, Ohio TV/CLASSIFIEDS Thursday, August 13, 2020 • 85

The Portage Metropolitan Housing Authority's proposed 2021 Moving to Work Annual Plan is available for public review and comment from August 13, 2020 to and including September 14, 2020. A public hearing discussing the Annual Plan will be held virtually via the GoToMeeting platform on September 14, 2020 at 2:00 p.m. To register to attend the virtual Public Hearing, please contact Carolyn Budd, Special Programs Manager, by telephone at (330) 297-1489 Ext. 239 or by email at cbudd@portagehousing.org.
Please provide your name, telephone number, and email address. On or before the date of the Public Hearing, all registrants will be pro-vided a link and access code to join the GoToMeeting. A draft of the Portage Metropolitan Housing Authority's proposed 2021 Moving to Work Annual Plan is available online at PMHA's for review website, at http://www.portagehousing.org. Questions and comments should be directed to Carolyn Budd, Special Programs Manager. RC. August 13, 2020, 12664991



Public Hearing Agenda for Plan Amendment



Portage Metropolitan Housing Authority

Public Hearing – Amendment to PMHA's 2021 Moving To Work Annual Plan Monday, May 17, 2021 at 2:00 p.m.

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 2021
 - Approved by HUD on December 3, 2020
 - Implemented by PMHA effective January 1, 2021
- V. New or Revised Goals and/or Activities
 - B-13 Self-Certification of Employment Income (Revised)
- VI. Other Issues
- VII. Adjournment

Public Hearing Minutes for Plan Amendment



Portage Metropolitan Housing Authority

Public Hearing - 2021 Moving To Work Annual Plan Proposed Amendment

May 17, 2021 at 2:00 p.m.

2832 State Route 59, Ravenna, OH 44266

MINUTES

The Public Hearing convened at 2:00 p.m. at the PMHA Office, by Carolyn Budd, PMHA Special Programs Manager.

No other persons were in attendance. No verbal comments were made for recording. No written comments were submitted for review, and no issues were brought forward.

The meeting was adjourned at 2:20 p.m.

Respectfully Submitted by:

Carolyn Bod

Carolyn Budd

Special Programs Manager

Public Hearing Attendance Record for Plan Amendment



Public Hearing

Attendance Sheet for the Amendment to 2021 MTW Annual Plan

Portage Metropolitan Housing Authority 2832 State Route 59, Ravenna OH 44266

Monday, May 17, 2021 at 2:00 p.m.

Name:	Phone Number, Email:	Attendance? (roll call, GoTo Meeting logins)
Carolyn Budd (PMHA)	330-297-1489 Ext. 213 cbudd@portagehousing.org	Yes

Classified Advertisement in the Record-Courier for Plan Amendment

Documentations of Public Notice, as published in newspaper and flyer format, are below:

NOTICE

amendment An to the Portage Metropolitan Housing Authority's 2021 Moving to Work Annual Plan is available for public review and comment from April 14, 2021 to and including May 14, 2021. A public hearing discussing the amendment to the Annual Plan will be held virtually via the GoToMeeting platform on May 17, 2021 at 2:00 p.m. To register to attend the virtual Public Hearing, please Carolyn contact Budd, Special Programs Manager, by e-mail to cbudd@portagehousing.org or by calling 330-297-1489 Ext. 239. Please provide telephone your name, number, and email address. On or before the date of the public hearing, all registrants will be provided a link and access code to join the GoToMeeting. A copy of the amended 2021 Annual Plan is available upon request, or you can also it online view at www.portagehousing.org. Questions and comments be should directed to Carolyn Budd. 11- 4/14/21 (5755616)

An amendment to the Portage Metropolitan Housing Authority's (PMHA's) 2021 Moving to Work (MTW) Annual Plan is available for public review and comment from April 14, 2021 to and including May 14, 2021. A public hearing discussing the Annual Plan will be held virtually via the GoToMeeting platform on Monday, May 17, 2021 at 2:00 p.m. To register to attend the virtual public hearing, please contact Carolyn Budd, Special Programs Manager, by telephone at (330) 297-1489 Ext. 239 or by email at cbudd@portagehousing.org. Please provide your name, telephone number, and email address. On or before the date of the Public Hearing, all registrants will be provided a link and access code to join the GoToMeeting. A copy of PMHA's proposed amendment to the 2021 MTW Annual Plan is available for review at www.portagehousing.org. It is also available upon request by calling (330) 297-1489 Ext. 239 or by emailing cbudd@portagehousing.org. Questions and comments should be directed to Carolyn Budd, Special Programs Manager. Portage Metropolitan Housing Authority 2832 State Route 59 Ravenna, Ohio 44266 Phone: (330) 297-1489 Website: www.portagehousing.org

C. PLANNED AND ONGOING EVALUATIONS

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

PMHA chooses not to be evaluated under the Public Housing Assessment System (PHAS) and the Section 8 Management Assessment Program (SEMAP) until required to do so by the Department of Housing and Urban Development.

D. LOBBYING DISCLOSURES

N/A: No lobbying activities.

A signed copy of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments to Influence Federal Transactions (form HUD-50071) are on the next page:

	DISCLOSURE OF L	OBBYING ACTI		ved by OME
Com	plete this form to disclose lobb	ying activities pursuar		4040-001
1. * Type of Federal Action: a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	2. * Status of Fede a. bid/offer/applica b. initial award c. post-award		3. * Report Type: a. initial filing b. material change	
4. Name and Address of Re Prime	ng Authority	Street 2	Zip 44266	
6. * Federal Department/Agen	cy:	7. * Federal Progr	ram Name/Description:	
U.S. Department of HUD		Moving to Work (MTW)	Demostration program	
8. Federal Action Number, if k	nown:	9. Award Amount \$		
10. a. Name and Address of L Prefix First Name N/A * Last Name N/A * Street 1 * City	A	Middle Name Suffix Street 2	Zip	
* Locat Name -	ICES (including address if different from N	o. 10a) Middle Name Suffix		
* Street 1 * City	State	Street 2	Zip	
reliance was placed by the tier above wh	en the transaction was made or entered into variable for public inspection. Any person we each such failure. *First Name Famela	. This disclosure is required purs	×	be reported to
Title: Executive Director			Authorized for Local Reprodu	ction

OMB Approval No. 2577-0157 (Exp. 03/31/2020)

Certification of Payments to Influence Federal Transactions

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

paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in contract, prant, loan, or cooperative agreement. (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of a Member of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement. (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of Congress, or an employee of a Member of Congress, in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions. I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accur Warning: HUD will prosecute false claims and statements. Conviction may result in oriminal and/or civil penalties. (18 U.S.C. 1001, 1010,	Applicant Name	
The undersigned certifies, to the best of his or her knowledge and belief, that: (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal coloract, the making of any Federal contract, reant, loan, or cooperative agreement, and the extension, continuation of any cooperative agreement, and the extension, continuation of any cooperative agreement. (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of a Member of Congress, an officer or employee of Congress, or a memployee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions. Thereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accum Marning: 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 Pamela Nation Calhoun	Portage Metropolitan Housing Authority (PMHA)	
(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contact, the making of any Federal contact, the making of any Federal contact, the making of any Federal contact, and the extension, continuation, for any cooperative agreement. (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress an officer or employee of an agency, a Member of Congress in connection with this Federal contact, grant, loan, or cooperative agreement, and the extension of the contact	Program/Activity Receiving Federal Grant Funding	
(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of an employee of a Member of Congress, in connection with the awarding of any Federal contract, the making of any Federal contract, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement. (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of a negency, a Member of Congress, an officer or employee of any ending of the congress, or an employee of a Member of Congress, no connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions. Thereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions. Thereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate and submit Standard Form-LLL, and the provided in the accompaniment herewith, is true and accurate and submit Standard Form-LLL, and the provided in the accompaniment herewith, is true and accurate and submit Standard Form-LLL, and the provided in the accompaniment herewith, is true and accurate and submit Standard Form and the provided in the accompaniment herewith, is true and accurate and submit Standard Form and the provided in the accompaniment herewith, is true and accurate and s	Moving to Work (MTW) Demonstration Program	
and, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal contract, and the extension, continuation, renewal, amendment, or modification of any cooperative agreement. (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions. I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accur 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 Pamela Nation Calhoun Tile Executive Director	The undersigned certifies, to the best of his or her knowledge and	d belief, that:
Pamela Nation Calhoun Executive Director	paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement. (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.	This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.
Pamela Nation Calhoun Executive Director		
	Name of Authorized Official	Title
Signature Date (mm/dd/yyyy)	Pamela Nation Calhoun	Executive Director
	Signature .	Date (mm/dd/yyyy)
(4) (1) (4) (4)	$Q \sim 14 \sim ca$	10/
Tamel Nation Calhan 07/08/2020	(amil) Nation (alhain	0'1/08/2020

ADDITIOANL APPENDIX ITEMS

Significant Changes to Activities: HUD requires MTW PHAs to re-propose activities that require "significant changes." A "significant change" occurs when the nature of the activity has changed such that an additional MTW authorization is needed OR when an MTW PHA fundamentally changes the nature and scope of an activity to the extent that there is the potential for a different impact on residents (e.g. changing the calculation of rent). In these cases, the activity must undergo a new public process. HUD reserves the right to determine on a case-by-case basis if the change made to an activity crosses this threshold and therefore requires the activity to be re-proposed.

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

Non-Smoking Policy in Public Housing: PMHA designated all Public Housing properties as smoke free effective July 30, 2018, per HUD's Final Rule "Instituting Smoke-Free Public Housing" published on December 6, 2016 and HUD Notice PIH-2017-03 issued on February 15, 2017. In 2018, PMHA conducted resident meetings for input on the draft smoke-free policy and modified the draft policy based on resident input. PMHA issued the revised draft policy to all Public Housing residents for a 30-day comment period. The policy was implemented by the effective date of July 30, 2018. Under this policy, PMHA bans the use of all prohibited tobacco products in all PMHA owned and/or managed dwelling units, within all units, indoor common areas, administrative offices and buildings, and in outdoor areas within 25 feet of any PMHA housing or administrative offices, buildings or structures along with outdoor common areas that include but are not limited to playgrounds, mailbox and dumpster areas, and school bus stops. PMHA offered residents information regarding and referrals to community organizations that provide smoking cessation services, as well as brought the Portage County Health District to one PMHA-owned building, the Opportunity Resource Center, to assist residents in preparation for smoke-free housing by providing a series of 5 tobacco cessation classes. PMHA will adopt any further non-smoking policies as required by law or HUD regulation.

Public Housing Over-Income Limit under the Housing Opportunity Through Modernization Act of 2016 (HOTMA) Policy in Public Housing: HOTMA was signed into law on July 29, 2016 (Public Law 114-201, 130 Stat. 782); section 103 of HOTMA amends section 16(a) of the United States Housing Act of 1937 (42 U.S.C. 1437n(a)) (1937 Act) and established an income limitations for continued occupancy in Public Housing. The law requires that after a family's income has exceeded 120 percent of the area median income (AMI), or a different limitation as may be established by the Secretary, for two consecutive years, a PHA must terminate the family's tenancy within 6 months of the second income determination or charge the family a monthly rent equal to the greater of: (1) the applicable Fair Market Rent (FMR); or (2) the amount of monthly subsidy for the unit, including amounts from the operating and capital fund, as determined by regulations. Section 103 of HOTMA requires PHAs to implement this over-income limit and, as such, PMHA has updated its Public Housing Admissions and Continued

Occupancy Policies (ACOP) to implement these changes and to establish policies for continued occupancy in Public Housing. PMHA will update its over-income limits annually in the ACOP, as required by HOTMA, no later than 60 days after HUD publishes new income limits each year. PMHA will adopt any further income limitation policies as required by law or HUD regulation.

Violence Against Women Act Policies: PMHA is committed to assisting victims of domestic violence. PMHA's Section 8 Administrative Plan and Public Housing Admissions and Continued Occupancy Plan (ACOP) 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 also will 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.

Portage Landings Renovations: PMHA extensively renovated the 24 agency-owned non-Public Housing units located at 170 and 221 Spaulding Drive in Kent, Ohio. This renovation was solely funded by HUD held reserves and did not utilize current HAP funds. The project was completed on May 18, 2020.

The primary purpose of this renovation was to improve the condition of the units and expand housing choices for low to moderately-low- income families. Although PMHA strives to maintain all agency-owned properties to meet all Housing Quality Standards, it became a struggle to maintain the Portage Landings buildings due to the age of the buildings and their systems. Replacing original building systems, as well as adding cosmetic updates, allowed PMHA to market these units to a larger, more diverse population. Portage Landings is in an area that is a prime rental location, due to having vast accessibility to employment opportunities, education, public transportation, grocery stores, health care services, etc.

The two major systems that required upgrades were plumbing and electrical. PMHA replaced the main sanitary verticals and horizontals, as well as the storm drainage system (gutters, downspouts, horizontals to tie into city storm drainage system). PMHA updated the front and rear security doors in both buildings for improved security. PMHA also expanded the laundry facilities to add additional washers and dryers for resident use. Since many of the walls and floors needed to be opened up to renovate plumbing, PMHA also painted walls and replaced flooring (VCT tile, vinyl planking, and carpet) in the common areas, as well as many of the units that did not have updated flooring. Plumbing fixtures also were upgraded. Other renovations included new appliances, electrical upgrades, and some window replacements to improve energy efficiency. These renovations made the units safer, easier to maintain, more energy efficient, and cosmetically updated, therefore expanding affordable housing choice, in updated units in a desirable location.

Security Improvements Project: PMHA is seeking to improve upon security at our six (6) Public Housing family sites, which are Athena Gardens, Community Estates, Ravenna (Harvest) Woods, Heritage Knolls, Renaissance Place, and Townsquare Villas. The primary purpose of this project is to improve the safety, security, and monitoring at these sites.

Each site will be equipped with security cameras mounted to either buildings or light posts, to offer surveillance coverage for the protection of our sites and our residents. Each site will also receive necessary lighting upgrades to help with camera surveillance under night or low daylight conditions. Each site will have multiple cameras, with either wired or wireless connection, connected to a central digital video recorder (DVR) located in either a locked property garage or locked community space office. Each DVR will be accessible remotely and viewable by select PMHA staff as a way to monitor site activity. This will serve as a resource if an incident would occur and footage would be needed by PMHA to enforce a lease or by law enforcement. In addition to the lighting upgrades and security camera system installation, the units at each site, except for Ravenna (Harvest) Woods, will receive new front and rear exterior entry doors and code-compliant lever hardware to ensure the safety of every resident and of PMHA's properties. The replacement doors and hardware at Ravenna (Harvest) Woods are already incorporated into a separate project under the Capital Funds grant.

This project would be solely funded by HUD held reserves and would not utilize current HAP funds.

Capital Fund Program – The Annual Statement/Performance and Evaluation Report (HUD 50075.1) or subsequent form required by HUD: In lieu of HUD 50075.1, PMHA chooses to include its Capital Fund Program Five-Year Action Plan (HUD 50075.2). Historically, PMHA was permitted under MTW to either submit the 50075.1 or the 50075.2. PMHA has submitted the 50075.2 because it gives the agency the flexibility of a rolling 5 Year Action Plan. However, a 50075.1 is always submitted annually in the spring to the HUD Field Office, based off the information in the 50075.2 that was submitted with the Annual MTW Plan the previous fall. PMHA's concern is that submitting the 50075.1 will limit the agency's flexibility as to what we will be able to do until next year's Annual MTW Plan submission. Submitting the 50075.2 (5 Year Plan) gives flexibility to make changes within the coming year's annual plan submittal if we see the need. For clarity, PMHA can list 20 potential projects in the 50075.2 for its 5 Year Plan, and when the agency submits the 50075.1 the following spring, we can pick from the 20 based on the agency's greatest needs. It is PMHA's understanding that MTW agencies are allowed this flexibility.

PHA-Wide Non-dwelling Structures and Equipment 0.00	and Name	t Number Work Statemen	and Fortage Coun			
Physical Improvements Subtotal Statement \$580,941.20 \$580,941.		for Year 1	for Year 1	Work Statement for Year 1	for Year 1	for Year 1
Management Improvements		provements Annual				\$ 580 941 20
Structures and Equipment 0.00 0.00 0 Administration 72,326.80 72,326.80 72,326.80 72,326.80 Other 50,000.00 50,000.00 50,000.00 49,000 MTW Demonstration - - - Operating 20,000.00 20,000.00 20,000.00 20,000.00 Development 0.00 0.00 0.00 0 0 Capital Fund Financing- Debt Service 0.00 0.00 0.00 0 0 0	Management Improvements	it its	\$ 380,941.20			-
Administration 72,326.80 49,000 49,000 49,000 49,000 49,000 20,000 20,000 20,000 20,000 20,000 20,000 20,000 20,000 20,000 20,000 20,000 20,000 20,000 20,000 20,000 20,000 20,000 20,00				0.00	0.00	0.00
Other 50,000.00 50,000.00 50,000.00 49,000 MTW Demonstration - <t< td=""><td></td><td></td><td>72,326.80</td><td>72,326.80</td><td>72,326.80</td><td>72,326.80</td></t<>			72,326.80	72,326.80	72,326.80	72,326.80
MTW Demonstration -				50,000.00	50,000.00	49,000.00
Development 0.00 0.00 0.00 0.00 0 0 0	MTW Demonstration	nstration	-			
Capital Fund Financing- Debt Service	Operating		20,000.00	20,000.00	20,000.00	20,000.00
Debt Service 0.00 0.00 0.00 0	Development	ıt .	0.00	0.00	0.00	0.00
700,000			0.00	0.00		0.00
Total of France	Total CFP Funds	unds	\$ 723,268.00	\$ 723,268.00	\$ 723,268.00	
Total Non-CFP Funds 0.00 0.00 0.00 0	Total Non-CFP Funds	FP Funds	0.00	0.00	0.00	0.00
Second Total \$ 723,268.00 \$ 723,268.00 \$ 723,268.00 \$ 723,268.00 \$ 722,268.	Grand Total		\$ 723,268.00	\$ 723,268.00	\$ 723,268.00	\$ 722,268.00

U.S. Department of Housing and Urban Development Office of Public and Indian Housing Expires 4/30/2011

	Work Statem	ent for Year: 2		Work Statem	ent for Year: 2	
Work	FFY: 2021			FFY: 2021		
Statement for Year 1 FFY 2020	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	OH31000001 - EAST AMP			OH31000001 -WEST AMP		
Annual	Renaissance Roofs	All	83,568.25			
Statement				Athena Gardens		
				Bath Vanities, toilet, tub/surround	All	56,412.00
			31,309.40			
				Heritage Knolls Roofs	All	77,348.75
	Renaissance Siding/Gutters/	All	120.000.00			
	downspouts/brick repair/storm doors	All	120,000.00			
	downspouts/brick repair/storm doors			Athena Gardens	All	
				Siding, gutters, downspouts,		
				storm doors, shutters		150,000.00
	Ravenna Woods Interior Blinds		10,000.00			
	Etna House Elevator Replacement		52,302.80			
						_
	Subtotal of Estimated Costs		\$ 297,180.45	Subtotal of Estimated Costs		\$ 283,760.75

Page 2 of 9 form HUD-50075.2

U.S. Department of Housing and Urban Development >Affice of Public and Indian Housing Expires 4/30/2011

	Work Statement for Year: 3			Work Statement for Year: 3		
Work	FFY: 2022			FFY: 2022		
Statement for Year 1 FFY 2020	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
Annual	OH31000001 - EAST AMP			OH31000002 - WEST AMP		
Statement	Louvered Doors PHA Wide	All	49,215.00	Roofs Town Square		50,000.00
	Central Air Renaissance	All	41,000.00	Interior and closet doors PHA Wide		46,500.00
	Cabinets and countertops Renaissance	All	65,000.00	Townsquare Cabinets/Countertop		57,426.65
				Bath Vanities and fixtures		
	Interior and closet Doors PHA Wide		56,351.75			
	Comm. Est. Bath Vanities and fixtures		36,000.00	Townsquare Plygrnd/Spray Pool		10,000.00
	Ravenna Woods Driveway Repairs		15,000.00	Town Square Landscaping		30,000.00
				Town Square Site Lighting		32,302.80
	Renaissance					
	Bath Vanities, Toilets, Tub Surrounds		92,145.00			
	Subtotal of Estimated Costs		\$ 354,711.75	Subtotal of Estimated Costs		\$ 226,229,45

Page 3 of 9 orm HUD-50075.2 (4/2008)

U.S. Department of Housing and Urban Development Office of Public and Indian Housing Expires 4/30/2011

	Work Statement for Year: 4			Work Statement for Year: 4		
Work	FFY: 2023			FFY: 2023		
Statement for Year 1 FFY 2020	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
Annual	OH31000001 - EAST AMP			OH31000002 - WEST AMP		
Statement		All		Security Cameras Walter Street		14,223.12
	Ravenna Woods Roofs	All	106,215.23	Security Cameras Town Square		15,224.84
	Renaissance Plygrnd/Spray Pool		12,451.00	Central Air Athena Gardens		50,000.00
	Secur. Cameras Community Estates		24,154.22	Louver Doors PHA Wide		38,356.84
	Comm. Estates Plygrnd/Spray Pool		15,000.00	Security Cameras Athena Gardens		15,000.0
	Eastowne Elevator Replacement		40,000.00	Athena Gardens Plygrnd/Spray Pool		15,000.0
	Eastowne Roof		29,553.00	Appliance Upgrade PHA Wide		62,302.8
	4325-4327 Marks Ave Septic Upgrade		54.295.75	Athena Gardens Roof		89,164.4
	Interior Upgrade					
	Subtotal of Estimated Costs		\$ 281,669,20	Subtotal of Estimated Costs	9	3 299,272.0

Page 4 of 9 form HUD-50075.2

U.S. Department of Housing and Urban Development Office of Public and Indian Housing Expires 4/30/2011

	Work Statement for Year: 5			Work Statement for Year: 5		
Work	FFY: 2024			FFY: 2024		
Statement for Year 1 FFY 2020	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
Annual	OH31000001 - EAST AMP			OH31000002 - WEST AMP		
Statement	Renaissance Comm. Space Upgrade		32,214.56	Heritage Knolls Community Space		27629.52
						10,000.00
	Security Cameras Ravenna Woods		20,000.00	Heritage Knolls Storm Doors		10,000.00
	Ravenna Woods plygrnd/Spray Pool		13,768.00	Heritage Knolls Landscaping		52,302.80
	4333-4339 Marks Ave Septic Rplcmt		54,295.75			
	Interior upgrade			Heritage Knolls Plygrnd/Spray Pool		15,000.00
	Appliance upgrade PHA wide		25,000.00	Heritage Knolls Site Lighting		20,000.00
	Central Air Community Estates		50,000.00	Heritage Knolls Cabinets/Counters/		55,334.17
				Bath vanities and fixtures		
	Community Estates Cabinets/		101,232.00			
	Countertops					
				Athena Kitchen Cabinets and		89,164.40
	1391 Fairview waterproofing bsmnt		15,000.00	Countertops		
	Subtotal of Estimated Costs		\$ 311,510,31	Subtotal of Estimated Costs		\$ 269,430.89

Page 5 of 9 form HUD-50075.2

U.S. Department of Housing and Urban Development Office of Public and Indian Housing Expires 4/30/2011

Part III: S	upporting Pages - Management Needs	Work Statement(s)			
	Work Statement for Year	: 2	Work Statement for Year: 2 2021		
Work	2021				
Statement for Year 1 FFY 2020	Development Number/Name General Description of Major Work Categories	Estimated Cost	Development Number/Name General Description of Major Work Categories	Estimated Cost	
Annual	OH31000001 - EAST AMP		OH31000002 - WEST AMP		
Statement					
	Fees & Costs- Advertising Bids & Architect Fee	34,500.00	Fees & Costs- Advertising Bids & Architect Fee	15,500.00	
	Administration- CFP Management Fee	49,905.49	Administration- CFP Management Fee	22,421.3	
	Operating Fund	13,800.00	Operating Fund	6,200.0	
	Subtotal of Estimated Costs	\$ 98,205.49	Subtotal of Estimated Costs	\$ 44,121.3	

Page 6 of 9 form HUD-50075.2

U.S. Department of Housing and Urban Development Office of Public and Indian Housing Expires 4/30/2011

Part III: S	upporting Pages - Management Needs	Work Statement(s)			
Work	Work Statement for Year: FFY: 2022	: 3	Work Statement for Year: 3 FFY: 2022		
Statement for Year 1 FFY 2020	Development Number/Name General Description of Major Work Categories	Estimated Cost	Development Number/Name General Description of Major Work Categories	Estimated Cost	
Annual	OH31000001 - EAST AMP		OH31000002 - WEST AMP		
Statement					
	Fees & Costs- Advertising Bids & Architect Fee	34,500.00	Fees & Costs- Advertising Bids & Architect Fee	15,500.00	
	Administration- CFP Management Fee	49,905.49	Administration- CFP Management Fee	22,421.31	
	Operations	13,800.00	Operations	6,200.00	
	Subtotal of Estimated Costs	\$ 98,205.49	Subtotal of Estimated Costs	\$ 44,121.31	

Page 7 of 9 form HUD-50075.2

U.S. Department of Housing and Urban Development Office of Public and Indian Housing Expires 4/30/2011

Part III: S	upporting Pages - Management Needs	Work Statement(s)			
	Work Statement for Year	: 4	Work Statement for Year: 4 FFY: 2023		
Work	FFY: 2023				
Statement for Year 1 FFY 2020	Development Number/Name General Description of Major Work Categories	Estimated Cost	Development Number/Name General Description of Major Work Categories	Estimated Cost	
Annual Statement	OH31000001 - EAST AMP		OH31000002 - WEST AMP		
Glatoment					
	Fees & Costs- Advertising Bids & Architect Fee	34,500.00	Fees & Costs- Advertising Bids & Architect Fee	15,500.00	
	Administration- CFP Management Fee	49,905.49	Administration- CFP Management Fee	22,421.31	
	MTW Demonstration	13,800.00	MTW Demonstration	6,200.00	
	Subtotal of Estimated Costs	\$ 98,205.49	Subtotal of Estimated Costs	\$ 44,121.31	

Page 8 of 9 form HUD-50075.2 (4/2008)

U.S. Department of Housing and Urban Development Office of Public and Indian Housing Expires 4/30/2011

Part III: S	upporting Pages - Management Needs	Work Statement(s)			
	Work Statement for Year:	: 5	Work Statement for Year: 5 FFY: 2024		
Work	FFY: 2024				
Statement for Year 1 FFY 2020	Development Number/Name General Description of Major Work Categories	Estimated Cost	Development Number/Name General Description of Major Work Categories	Estimated Cost	
Annual Statement	OH31000001 - EAST AMP		OH31000002 - WEST AMP		
Otatement		-			
	Fees & Costs- Advertising Bids & Architect Fee	34,500.00	Fees & Costs- Advertising Bids & Architect Fee	14,500.00	
	Administration- CFP Management Fee	49,905.49	Administration- CFP Management Fee	22,421.31	
	Operating	13,800.00	Operating	6,200.00	
			Site Acquisition	1,000.00	
	`				
	Subtotal of Estimated Costs	\$ 98,205.49	Subtotal of Estimated Costs	\$ 44,121.31	

Page 9 of 9 form HUD-50075.2