

PHA Name : Randolph County

PHA Code : WV045

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

PHA Program Type: Housing Choice Voucher (HCV) only

MTW Cohort Number: 1

MTW Supplement Submission Type: Amended Annual Submission

B. MTW Supplement Narrative.

MTW Supplement Narrative.
Plan for RCHA's Moving-To-Work Program

1. Cost Effectiveness: In order to reduce cost and achieve greater cost effectiveness in federal expenditures, RCHA would like to streamline its HCV program. Anything that saves time for staff will increase the time they have available for priority programs such as Family Self-Sufficiency outreach and support, and Section-to-Homeownership program participation. Making the program more streamlined for residents will mean less paperwork on their part, which is often an issue that delays voucher assistance or leads to unwanted terminations.

a. For Year One of MTW (FY 2022) RCHA would like to request waivers in the following areas in order to make its HCV program more cost-effective to operate:

- i. Standard Deductions for elderly and disabled participants,
- ii. Alternative Utility Allowances to make rent calculations more streamlined, and
- iii. Pre-Inspections of newly constructed or renovated units.

2. Self-Sufficiency: RCHA would like to incentivize households that have the ability to generate earned income, to do so. This will involve a work requirement but also participation in a Financial Opportunity Center to receive coaching and support in the areas of employment, benefits, and financial planning. Another incentive would be allowing households that are working and over-income to transition off the housing subsidy over a longer time period than is currently allowed. In addition, the agency would like to be able to support low-income households with an HCV subsidy when an emergency occurs, such as a house fire or natural disaster, which threatens to make them homeless or in a housing-burdened situation. Short term help could keep a household from experiencing extreme financial duress in addition to the trauma of the emergency event.

a. For Year One of MTW (FY 2022) RCHA will research the following topics but will NOT be requesting waivers:

- i. Work Requirement that would require households receiving HCV assistance that are not elderly, disabled, or single parent with young child to work at least part-time,
- ii. Mandatory Participation in a MTW Self-Sufficiency program, which will include participating in a Financial Opportunity Center offered by a partner nonprofit, and
- iii. Income Waiver to allow a period of ongoing housing subsidy once the household exceeds the existing income limits.
- iv. In addition, the agency would like to consider a set-aside of a small number of vouchers for use in emergency situations that result in short-term housing loss such as fires or natural disasters.

3. Housing Choice: RCHA is an affordable housing developer in the region, which is characterized by old and substandard rental housing stock. In addition, the 'pandemic economy' has had the effect of severely tightening the rental market. It is often difficult to secure sufficient financing to support new and renovated rent-restricted housing. Being able to utilize HAP dollars for gap financing in these circumstances would help the agency develop more units, which are sorely needed in the region.

a. For Year One of MTW (FY 2022) RCHA would like to request a waiver in the following areas in order to increase housing choices for low-income families:

- i. Housing Development as an alternative use of up to 10% of HAP dollars.
- b. For Year One of MTW (FY 2022) RCHA will research the following topic but will NOT be requesting waivers:
 - i. Vacancy Loss Payments to landlords.

All waivers and adjustments will be implemented 30 to 60 days after approval.

There was no attendance at the two scheduled public meetings addressing the Annual PHA Plan and the MTW Supplement. There were no challenged elements to the PHA plan. There were no challenged elements to any aspect of the MTW supplement.

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

1. Tenant Rent Policies	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Plan to Implement in the Submission Year
l. Fixed Subsidy (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
u. Standard Deductions (HCV)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented

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

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

1.j. - Alternative Utility Allowance (HCV)
Using an alternative utility allowance will streamline the work of the Occupancy Specialist, while making the UA easier to understand for the tenant receiving assistance.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Randolph County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
Utility allowances will be reviewed each year and allowances revised when there is a minimum of a 10% change in cost from the prior year. The Housing Authority will develop one utility allowance for the six county jurisdiction that is based on unit size and unit type. Gas, electric, and trash rates are standard across the six counties due to the same providers. Water and sewer tables will be averaged for each county. The new method will make reduce our utility allowance schedules from 24 to 4 which will reduce time staff spends with allowances as well as reducing costs. Tenants will be able to better understand the part the allowance plays in rent determination.

1.u. - Standard Deductions (HCV)
A standard deduction for medical expenses will be applied to calculations of income for senior and disabled tenants. This will streamline the work of the Occupancy Specialist and make it easier for tenants to apply for the program. This activity will make staff time available for supporting and promoting the Family Self-Sufficiency program and Section

8-to-HomeOwnership program.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
The MTW activity applies to all tenant-based units
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Randolph County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
2,000 will be the single standard deduction in the Fiscal Year

3.d. - Self-Certification of Assets (HCV)
In this activity, applicants will self-certify assets up to \$50,000. This will shorten the application period for both staff and applicant, by avoiding the use of third-party verification which can be time-consuming.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Randolph County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The dollar threshold for the self-certification of assets is \$50,000.

5.a. - Pre-Qualifying Unit Inspections (HCV)
HQS inspections will be allowed to take place prior to a Request for Tenancy in vacant units which landlords expect to be rented within 15-30 days. RCHA has a large geographic jurisdiction (about the size of Rhode Island). This will give the one inspector the ability to bundle inspections in one building or town, making the use of her time more efficient, as well as streamlining the lease-up process by having the inspection done prior to voucher issuance. It should shorten the time to lease-up and save the inspector time and save transportation costs for the agency .
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Randolph County MTW agency Received 0 hardship requests

Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.
The pre-inspection is valid for 30 days.

17.c. - Housing Development Programs
The agency is an active affordable housing developer. Utilizing up to 10% of HAP dollars for housing development will provide much-needed acquisition funds as well as "match" or "leverage" dollars to competitive funding applications. Utilizing funds in this way will generate more units of housing for low and very-low income households. This activity contributes to a strategic goal of RCHA, which is to expand the affordable housing stock in its jurisdiction.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Randolph County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Four Seasons	Acquisition and Rehab	Gap financing	18.00	18.00	2.00	8.00	8.00	0.00
Iron Road	Acquisition and Renovation	Gap financing	18.00	18.00	6.00	6.00	6.00	0.00

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Bruce Street Apartments	Rehab (8) and New Construction (1)	Gap Financing	9.00	9.00	9.00	0.00	0.00	0.00
Valley Village	Acquisition (ROFR) of expired LIHTC property	Gap Financing	48.00	48.00	0.00	48.00	0.00	0.00

Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

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

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

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

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
Income Level		Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income		
49%-30% Area Median Income		
Below 30% Area Median Income		
Total Local, Non-Traditional Households		0

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

G.2	Establishing Reasonable Rent Policy.
MTW agency did not established a rent reform policy to encourage employment and self-sufficiency RCHA is considering: i. Work Requirement that would require households receiving HCV assistance that are not elderly, disabled, or single parent with young child to work at least part-time, ii. Mandatory Participation in a MTW Self-Sufficiency program, which will include participating in a Financial Opportunity Center offered by a partner nonprofit, and iii. Income Waiver to allow a period of ongoing housing subsidy once the household exceeds the existing income limits.	

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.	
<p>To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.</p>		
Family Size:	Occupied Number of Local, Non-Traditional units by Household Size	
1 Person		
2 Person		
3 Person		
4 Person		
5 Person		
6+ Person		
Totals	0	

H.	Public Comment	
<p>Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.</p>		
<p>No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver</p>		

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



RCHA Hardship Policy for MTW Initiative

The RCHA Hardship policy is designed to address:

- A. Utility Allowance Activities**
- B. Standard Deduction for Elderly and Disabled**
- C. All Other Activities**

All hardships requests must be made in writing, stating both the reason for the hardship and the expected duration.

Each request will be reviewed and weighed against other local resources available to the family. The result of the review may consist in referral to other local resources, an adjustment in the portion of a household's utility allowance, a change in the client's standard deduction, or relief from another determined hardship.

A. Utility Allowance Activities

In order to qualify for a hardship exemption, households must meet all of the criteria listed below.

1. The household is in compliance with all program rules and regulations
2. The household does not owe RCHA money or is current with a re-payment agreement
3. Newly calculated utility allowance falls short of covering a household's utility bills.

Approval Process for Utility Allowance Activities

- Households that meet the criteria listed above may mail, fax, hand deliver a letter, or e-mail a request to RCHA.
- RCHA staff will review the request promptly and identify the difference in an utility bill from the utility allowance.
- The new utility allowance is approved if there are no other issues. If there are other issues a further review will be conducted with consultation of the Housing Manager.



Hardship Relief for Utility Allowance Activities

If the difference between the utility allowance and the utility bill is \$10 or greater, the utility allowance will be adjusted to reflect the change.

B. Standard Deduction for Elderly and Disabled

In order to qualify for a hardship exemption, households must meet all of the criteria listed below.

1. The household is in compliance with all program rules and regulations
2. The household does not owe RCHA money or is current with a re-payment agreement
3. The standard deduction does not cover applicable expenses accrued throughout the year.

Approval Process for Utility Allowance Activities

- Households that meet the criteria listed above may mail, fax, hand deliver a letter, or e-mail a request to RCHA.
- RCHA staff will review the request promptly and identify the difference in expenses compared to that of the standard deduction.
- A new deduction amount is approved if there are no other issues. If there are other issues a further review will be conducted with consultation of the Housing Manager.

Hardship Relief for Utility Allowance Activities

If the difference between the standard deduction and applicable expenses is \$100 or greater, the deduction will be adjusted to reflect the change.

C. All Other Activities

In order to qualify for a hardship exemption, households must meet all of the criteria listed below.

1. The household is in compliance with all program rules and regulations
2. The household does not owe RCHA money or is current with a re-payment agreement
3. A hardship must be determined to exist



Approval Process for Other Activities

- Households that meet the criteria listed above
- Household communicates its believed hardship by mail, fax, hand-delivered letter, or e-mail to RCHA.
- RCHA staff will review the request promptly in order to identify if a hardship exists.

Hardship Relief for Other Activities

Supervisor approves the requested hardship if it is determined such a hardship exists. In the event a hardship is confirmed to exist, the Housing Manager and Executive Director will determine an equitable response.

If Hardship is Denied

If a hardship is denied, an individual can appeal to RCHA's Executive Director.

There was no attendance at the two scheduled public meetings addressing the Annual PHA Plan and the MTW Supplement. There were no public comments submitted to RCHA. There were no challenged elements to the PHA plan. There were no challenged elements to any aspect of the MTW supplement.

MTW CERTIFICATIONS OF COMPLIANCE**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (1/01/2022), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Randolph County Housing Authority
MTW PHA NAME

WW045
MTW PHA NUMBER/HA CODE

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

Michael L. Bell
NAME OF AUTHORIZED OFFICIAL

President
TITLE

Michael L. Bell
SIGNATURE

5/6/22
DATE

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