

# PHA Name : Springfield Housing Authority

**PHA Code :** IL004

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 1/1/2024

**PHA Program Type:** Combined

**MTW Cohort Number:** Asset Building

**MTW Supplement Submission Type:** Annual Submission

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

The Springfield Housing Authority (SHA) has decades long history of administering and/or participating in programs that foster self-sufficiency of its residents inclusive of, but not limited to: homeownership (Public Housing & Housing Choice Voucher programs), HUD certified Housing Counseling provider, elective Family Self-Sufficiency (FSS) Program (Public Housing & Housing Choice Voucher programs), Youthbuild, Resident Opportunities to Self-Sufficiency (ROSS) program provider, etc.

The SHA serves as a Board member to various local initiatives to stay connected to the community and the housing needs of its community members such as: the Continuum of Care, Springfield/Sangamon County Homeless Strategic Planning Committee, United Way, YMCA, Land of Lincoln Workforce Alliance, Housing Action Illinois Consortium, etc.

The SHA has longstanding Memorandums of Understanding and commitments of in-kind services to foster the self-sufficiency of the families served through Housing Counseling, FSS and ROSS for services such as mental health assistance, GED assistance, financial, planning/family budgeting, health services, etc.

Engaging in Moving to Work activities is a natural progression for the SHA to further enhance its commitment to fostering self-sufficiency initiatives for families served by the SHA and in turn creating a stronger community long-term. Under the Credit Building Option, the SHA will report the public housing positive rent payments of public housing households enrolled in the program to all three credit bureaus to aid in building credit for the enrolled household. The SHA implementation model of this option will rely on staffing from three departments: Public Housing, Self-Sufficiency Programs and Finance. The SHA will utilize its Public Housing staff (Asset Managers, Management Associates, ROSS Coordinator and Occupancy Specialists) as well as its Self-Sufficiency Programs staff (Director of Self-Sufficiency Programs, Housing Counselor and FSS Specialists) to conduct outreach efforts through direct mailing, website/newsletter promotions, on-site informational sessions at each public housing development, interim and annual recertifications. During the initial outreach process, all public housing residents, regardless of elderly and/or disabled status, will be provided information relative to the credit building option and how to enroll to participate. The SHA will utilize its Finance Department staff (Director of Finance, Finance Manager, A/R Clerk, Accounting Clerk) to conduct the rent reporting to the credit bureau each month for each participating household. Rent reporting shall be conducted in accord with standard practices that protects consumers. The SHA will report rent paying history to the credit bureau(s) on a monthly basis for all participating households for a period of twenty-four (24) months in accordance with PIH Notice 2022-11.

In reviewing the MTW statutory objectives, the SHA has identified short and long-term initiatives that may further the SHA in meeting its mission, inclusive of, but not limited to:

### **Cost Effectiveness**

- Alternative Income Inclusions/Exclusions
- Rent Reasonableness – by allowing the SHA to perform rent reasonable determinations on PBV units it owns, manages, and/or controls will result in less administrative burdens and more cost effectiveness of limited HUD resources.
- Third Party Requirement – by allowing the SHA to perform HQS inspections on PBV units it owns, manages and/or controls will result in less administrative burdens and more cost effectiveness of limited HUD resources.
- Alternative Reexamination Schedule for Households – upon completion of an impact analysis, the SHA may implement an alternative reexamination schedule for its Public Housing and Housing Choice Voucher programs from annual reexamination requirements to reexaminations conducted every three (3) years including a hardship policy. SHA policies already allow for interim reexaminations at any time between annual reexaminations.
- Acquisition Without Prior HUD Approval – As the SHA looks to develop additional public housing units within its Faircloth Limits and/or convert existing public housing properties through the RAD process, the flexibility of acquisition without prior HUD approval would allow for a more streamlined approach to development, understanding that the SHA is still required to submit acquisition documentation to HUD for review within 30 days of acquisition.

### **Self-Sufficiency**

- Public Housing as an Incentive for Economic Progress – the SHA proposed to increase the period for up to three years for which a household can be over-income while remaining in a subsidized public housing unit with their subsidy as an incentive for the economic progress and eventual self-sufficiency of the household.
- Moving On Policy – with the award of Emergency Housing Vouchers, the Heartland Continuum of Care prioritized referring those households living in permanent supportive housing to “move-on” to the Emergency Housing Voucher program. As a continuation of that model, the SHA will work with the Heartland Continuum of Care to implement an additional preference for permanent supportive housing residents and to designate 20 HCV vouchers annually for issuance to program participants transitioning out of permanent supportive housing.

### **Housing Choice**

- Initial Rent Burden – by increasing the family share at initial occupancy from 40% to 60%, households served may have additional opportunities for housing options/housing choice in the Springfield community.

- Payment Standards – by increasing the payment standard to up to 120% of the Fair Market Rent, households served may have additional opportunities for housing options/housing choice in the Springfield community.
- Vacancy Loss, Damage Claims & Other Landlord Incentives – the SHA has proposed language to incentivize landlords' continued participation in the HCV program. In addition, the SHA has proposed language to incentivize new landlords with units in high opportunity areas or in areas where vouchers are difficult to use to join the HCV program.
- Increase PBV Program Cap – The SHA has elected to increase the number of authorized units it project-bases to 25% of its total authorized units or annual budget authority. The cap increase may result in additional partnerships with LIHTC developers constructing new units in the Springfield community.
- Increase PBV Project Cap – The SHA may elect to increase the PBV cap within a project up to 100% within a development. The cap increase may allow the SHA to serve harder to serve populations through permanent supportive housing developments where 100% PBV is key for the long-term viability of the development.

The SHA looks forward to the positive impact Moving To Work initiatives will have on affordable housing opportunities for families in need in the Springfield Illinois community.

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

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

<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
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
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
Use of Public Housing as an Incentive for Economic Progress (PH)	Plan to Implement in the Submission Year
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

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

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>In order to recruit additional landlords and maintain existing landlord partnerships, the Springfield Housing Authority intends to provide vacancy loss assistance payments to landlords that remain renting their units through the Housing Choice Voucher program. This landlord incentive may also contribute to non-traditional landlords participating in the program as well as provide incentive for landlords with units in high opportunity areas to participate in the program. The SHA will follow each of the safe harbors in implementation of this activity.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Increased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>N/A</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)</b></p> <p>To all units</p>
<p><b>What is the maximum payment that can be made to a landlord under this policy?</b></p> <p>One month of contract rent upon lease up of a new family in the existing unit.</p>
<p><b>How many payments were issued under this policy in the most recently completed PHA fiscal year?</b></p> <p>0</p>
<p><b>What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?</b></p> <p>\$0</p>

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>In order to incentivize new landlords to join the HCV program, the Springfield Housing Authority will provide incentive</p>

payments to landlords leasing properties in high opportunity neighborhoods or in areas where vouchers are difficult to use. The SHA will follow each of the safe harbors in implementation of this activity.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

N/A

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)**

To all units

**What is the maximum payment that can be made to a landlord under this policy?**

Equal to no more than one month of the contract rent.

**How many payments were issued under this policy in the most recently completed PHA fiscal year?**

0

**What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?**

\$0

#### **5.a. - Pre-Qualifying Unit Inspections (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

In order to streamline the move in process for Housing Choice Voucher holders, the Springfield Housing Authority elects to offer pre-qualifying unit inspections. The SHA will follow each of the safe harbors in implementation of this activity.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

N/A

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**How long is the pre-inspection valid for?**

The pre-inspection is valid for 90 days.

**5.c. - Third-Party Requirement (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The Springfield Housing Authority utilizes the RAD and mixed finance programs to redevelop its aging housing stock. Through the redevelopment process, in the past, the Springfield Housing Authority has had to contract with third party vendors to conduct annual inspections of the properties in which it has an ownership interest. In order to be more efficient, the Springfield Housing Authority elects to conduct annual inspections on units it owns, manages or controls.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

N/A

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Please explain or upload the description of the quality assurance method:**

Following will explain the quality assurance method  
The Springfield Housing Authority will contract with a third- party vendor to conduct quality control inspections at any

property the SHA owns, manages or controls, annually. The household may request an interim inspection. At HUD's request, the SHA will obtain the services of a third-party entity to determine if SHA owned units pass inspection standards.

No document is attached.

### 9.a. - Increase PBV Program Cap (HCV)

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The Springfield, Illinois community is working toward a city-wide coordinated approach to the development of affordable housing. With this process, the Springfield Housing Authority will be a critical partner in providing rental assistance for affordable housing developments targeted to low- and moderate-income families and special needs populations. The ability to increase the PBV program cap will allow the SHA to achieve higher utilization rates and expand affordable housing and provide newer assisted housing stock through new construction and/or rehab activities.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

N/A

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**What percentage of total authorized HCV units will be authorized for project-basing?**

25.00%

### 13. - How many months will households be able to remain in a unit while over income? (PH)

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

In order to provide an incentive to working families with continued subsidy as the incentive for economic progress and overall self-sufficiency of the household, the SHA will extend the period for which a household can be over-income while remaining in public housing from 24 months to 36 months. The SHA will follow each of the safe harbors in implementation of this activity.

**Which of the MTW statutory objectives does this MTW activity serve?**

Self-sufficiency

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

N/A

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**How many months will households be able to remain in a unit while over income?**

36

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</b></p> <p>No Safe Harbor Waivers are being requested.</p>

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></p> <p>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, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b></p> <p>No Agency-Specific Waivers are being requested.</p>
<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b></p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2023	\$3,897,273	\$2,717,904	\$1,179,369	2031-09-30

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

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

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<p><b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> No</p> <p><b>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.</b></p>	

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

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

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

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

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

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

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

I.	Evaluations.
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No known evaluations.

**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 (01/01/2024), 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.

Springfield Housing Authority

IL004

**MTW PHA NAME**

**MTW PHA NUMBER/HA CODE**

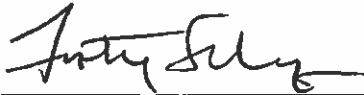
*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C.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

Timothy Schweizer

Chairman

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**



**SIGNATURE**

**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.*



## U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Chicago Regional Office  
77 W. Jackson Blvd.  
Chicago, Illinois 60604-3507  
Phone: (312) 913-8300 / Fax: (312) 913-8889

OFFICE OF PUBLIC HOUSING

Dr. Jackie Newman, Executive Director  
Springfield Housing Authority  
200 N 11<sup>th</sup> ST  
Springfield, IL 62703

**SUBJECT:** Springfield Housing Authority IL004 - PHA 2024 Annual Plan, 5-Year Plan and MTW Supplement with MTW Waivers Approval

Dear Dr. Newman,

On October 11, 2023, the Springfield Housing Authority (SHA) submitted its Annual Plan, 5-Year Plan and MTW Supplement with MTW Waivers for the fiscal year beginning January 01, 2024. The PHA Plans are considered as approved if the PHA is not troubled and a 75-day time period passes without action by HUD. In the case of the Springfield Housing Authority, the Annual Plan, 5-Year Plan and the MTW Supplement for the fiscal year beginning January 01, 2024, is approved.

The Department's approval of this MTW Supplement to the PHA Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act as outlined by the MTW Operations Notice. In providing assistance to families under programs covered by this MTW Supplement to the PHA Plan, your PHA must comply with the rules, standards, and policies established in the MTW Supplement to the PHA Plan as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Operations Notice.

Your approved plans and all required attachments and documents must be made available for review and inspection at the principal office of the PHA during normal business hours.

If you have any questions or concerns pertaining to this letter, please contact Camille Yancey, Portfolio Management Specialist, by email at [camille.h.yancey@hud.gov](mailto:camille.h.yancey@hud.gov), or by telephone at 312-913-8302.

Sincerely,

William O. Dawson III, MPA  
Director, Illinois State Office  
of Public Housing, Region V

Changing lives one key at a time

**MINUTES OF PUBLIC HEARING MEETINGS**  
2024 PHA Plan Submission  
2024 MTW Supplement  
Admissions & Continued Occupancy Plan Changes  
Administrative Plan Changes  
2019 Capital Fund Program Closeout  
Five-Year Capital Fund Program (FY 2024-2028)

During this PHA Plan period, residents were able to attend in person. Dr. Jackie L. Newman, Executive Director; Melissa Huffstedtler, Deputy Director; Ligia Anderson, Contract Administrator and Evonite Smith, Executive Assistant were present in person at the scheduled meetings.

**Location: Hildebrandt Hi-Rise**  
**Date: August 31, 2023**

**Time: 1:00 p.m.**

August 31, 2023, Hildebrandt Public Meeting Minutes

In attendance were: Robin Rigney, resident; Byron Stout, resident; Brenda Baptist, resident; Angela Arnold, Resident; Sherri Castles, Hildebrandt Management Associate; Dr. Jackie L. Newman, Executive Director; Melissa Huffstedtler, Deputy Director; Ligia Anderson, Contract Administrator; and Evonite Smith, Executive Assistant.

Melissa Huffstedtler provided an introduction to the PHA Plan. She provided an overview of the PHA plan process, how the funds are used, and the goals and objectives of the 1-year and 5-year plans. Proposed capital work items contained in the 2024 plan include but are not limited to: siding, windows, doors, kitchens, bathrooms, floors, landscaping, improved exterior exits, new appliances, elevator replacement, electrical upgrades, tree removal and security camera upgrades.

Melissa Huffstedtler and Ligia Anderson provided an overview of the 2019 Capital Funds and the work items they were spent on.

Melissa Huffstedtler provided an overview of the SHA's short- and long- term redevelopment plans to include RAD conversions of Madison Park Place, Brandon and Hildebrandt. The SHA is also considering expanding public housing by developing new construction senior housing.

Melissa Huffstedtler provided a summary of policy revisions due to HUD regulatory changes such as HOTMA and NSPIRE. A summary of the NSPIRE inspection standards was provided. An overview of HOTMA policy changes relative to program eligibility determinations and income and asset calculations was provided inclusive of, but not limited to:



## Changing lives one key at a time

- the HUD health and medical deduction will be changing from 3% to 10%. A hardship exemption policy has been established in accordance with the HOTMA regulations;
- The definitions have been updated including the definition of family, income, assets, deductions, etc.

Melissa Huffstedtler provided an overview of the SHA's Move to Work demonstration status including the proposed policy changes inclusive of, but not limited to:

- Public Housing:
  - To allow over income families in public housing to remain housed for a period of three years instead of two as required by HUD;
- Housing Choice Voucher Program:
  - To allow flexible eligibility criteria for project-based vouchers providing on-site supportive services for special needs populations;
  - To allocate tenant-based vouchers to operate a voluntary Emergency Housing Voucher program;
  - To allocate tenant-based vouchers to operate a Temporary Relocation Voucher program;
  - To provide landlord incentives for landlords continuing to participate in the program and to new landlords leasing in high opportunity areas or areas where vouchers are difficult to use;
  - To adopt a "Moving On" preference to allocate a number of tenant-based vouchers to applicant households transitioning from permanent supportive housing to permanent housing;
  - To conduct pre-qualifying unit inspections;
  - To increase the cap of tenant-based vouchers that can be converted to project-based vouchers; and
  - To allow the SHA to inspect project-based voucher units that it owns or operates.
- Credit Reporting Initiative:
  - As part of the Moving to Work cohort, the SHA is about to roll out a program for public housing residents to participate in credit reporting of positive rent paying practices in order to assist families in improving credit scores. More information will be provided and additional meetings will be held to let families know how to participate if they are interested.
  - It was communicated that there would be limited spots available to participate and that HUD would conduct a formal study of families participating in the program.

No additional comments received from Byron Stout, Brenda Baptist, and Angela Arnold.



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Comments/Concerns from Robin Rigney: Robin suggested 1st-floor apartment accommodations for wheelchair/walker tenants. She also suggested a beauty salon or to have a beautician come in to assist more often. Melissa Huffstedtler responded that first floor accommodations could be made through the ADA reasonable accommodations process and that the SHA would consider suggestions for an on-site beauty salon.

**Development: The Villas at Vinegar Hill**

**Time: 3:00 p.m.**

**Date: August 31, 2023**

August 31, 2023 Villas at Vinegar Hill Public Meeting Minutes

In attendance: Atha Otken, resident; Dr. Jackie Newman, Executive Director; Melissa Huffstedtler, Deputy Director; Ligia Anderson, Contract Administrator; and Evonite Smith, Executive Assistant.

Melissa Huffstedtler provided an introduction to the PHA Plan. She provided an overview of the PHA plan process, how the funds are used, and the goals and objectives of the 1-year and 5-year plans. Proposed capital work items contained in the 2024 plan include but are not limited to: siding, windows, doors, kitchens, bathrooms, floors, landscaping, improved exterior exits, new appliances, elevator replacement, electrical upgrades, tree removal and security camera upgrades.

Melissa Huffstedtler and Ligia Anderson provided an overview of the 2019 Capital Funds and the work items they were spent on.

Melissa Huffstedtler provided an overview of the SHA's short- and long- term redevelopment plans to include RAD conversions of Madison Park Place, Brandon and Hildebrandt. The SHA is also considering expanding public housing by developing new construction senior housing.

Melissa Huffstedtler provided a summary of policy revisions due to HUD regulatory changes such as HOTMA and NSPIRE. A summary of the NSPIRE inspection standards was provided. An overview of HOTMA policy changes relative to program eligibility determinations and income and asset calculations was provided inclusive of, but not limited to:

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  - It was communicated that there would be limited spots available to participate and that HUD would conduct a formal study of families participating in the program.

There were no additional comments or questions from anyone in attendance.

**Location: Bonansinga Hi-Rise**

**Time: 11:00 a.m.**

**Date: September 1, 2023**

September 1, 2023, Bonansinga Public Meeting Minutes

In attendance were Frances Honeycutt, resident, Melissa Huffstedtler, Deputy Director; Ligia Anderson, Contract Administrator; and Evonite Smith, Executive Assistant.



## Changing lives one key at a time

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Melissa Huffstedtler and Ligia Anderson provided an overview of the 2019 Capital Funds and the work items they were spent on.

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  - It was communicated that there would be limited spots available to participate and that HUD would conduct a formal study of families participating in the program.

Frances Honeycutt provided that the carpets were in need of cleaning and requested that when the parking lot upgrades occur that the SHA consider installing speed bumps for resident safety. There was general discussion about the replacement of the elevators. Melissa Huffstedtler provided that the replacement of elevators was already included in the Capital Fund five-year plan as well as the paving/parking lot upgrades. The SHA will consider adding speed bumps when it conducts the paving/parking lot upgrades.

**Resident Advisory Board Meeting**  
**Date: September 6, 2023**

**200 N. Eleventh Street**  
**Time: 1:00 p.m.**

### September 6, 2023 Resident Advisory Board (RAB) Meeting Minutes

In attendance were: Janet Heard, resident; Sharon Kay Scharf, resident; Melissa Huffstedtler, Deputy Director; and Evonite Smith, Executive Assistant.

Melissa Huffstedtler provided an introduction to the PHA Plan. She provided an overview of the PHA plan process, how the funds are used, and the goals and objectives of the 1-year and 5-year plans. Proposed capital work items contained in the 2024 plan include but are not limited to: siding, windows, doors, kitchens, bathrooms, floors, landscaping, improved exterior exits, new appliances, elevator replacement, electrical upgrades, tree removal and security camera upgrades.

Melissa Huffstedtler provided an overview of the 2019 Capital Funds and the work items they were spent on.



## Changing lives one key at a time

Melissa Huffstedtler provided an overview of the SHA's short- and long- term redevelopment plans to include RAD conversions of Madison Park Place, Brandon and Hildebrandt. The SHA is also considering expanding public housing by developing new construction senior housing.

Melissa Huffstedtler provided a summary of policy revisions due to HUD regulatory changes such as HOTMA and NSPIRE. A summary of the NSPIRE inspection standards was provided. An overview of HOTMA policy changes relative to program eligibility determinations and income and asset calculations was provided inclusive of, but not limited to:

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  - It was communicated that there would be limited spots available to participate and that HUD would conduct a formal study of families participating in the program.

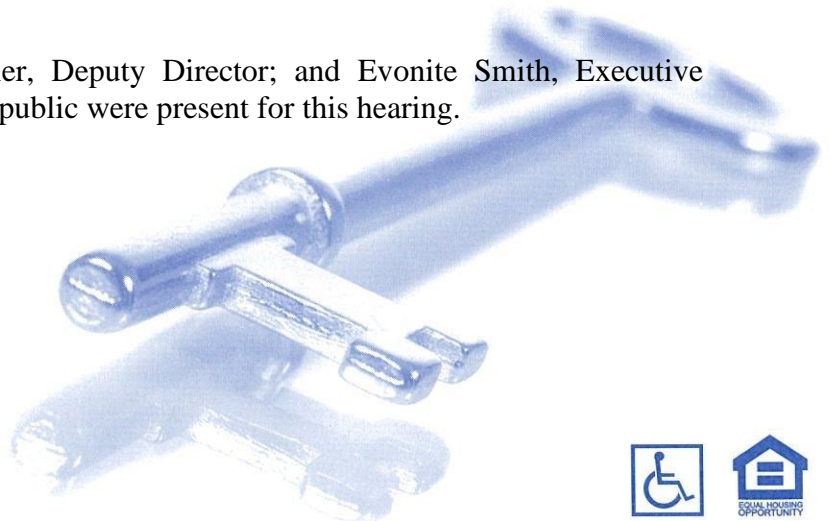
Janet Heard provided that the landscaping completed with Capital Funds could use some further assistance including mulch and better plants. She provided some work items that needed repaired in her unit. Melissa Huffstedtler responded that maintenance would take a look at her unit and determine necessary steps to fix the deficiencies and that there are additional Capital Fund monies budgeted for landscaping that can build upon the work that was completed previously.

Sharon Kay Scharf provided that she was resigning from the Resident Advisory Board at the end of this year and recommended Don Holland at the Villas to take her place. She requested the following items be included in the Capital Fund budgets: a roof/cover over the picnic area on the Williams Boulevard side of the property, tree removal of dead or damaged trees, privacy for the Management Associate in the lobby of the building, better maintenance care of the roses that line the walkway along with different mulch options, repairs to the fire alarm system and a way to provide in-unit power during power outages. Melissa Huffstedtler responded that the lobby upgrades have already been included in the 2023 Capital Fund plan and will be scheduled. Melissa Huffstedtler also provided that the roof/cover over the picnic area could be addressed with Capital Funds. The other items (tree trimming/removal, mulch, rose maintenance, fire panel, etc.) could be addressed within the annual maintenance budgets. The SHA will look into the in-unit power generator. Currently, power generators are providing power to common areas during power outages.

**Location: 200 N. Eleventh Street**  
**Date: September 7, 2023**

**Time: 5:00 p.m.**

In attendance were: Melissa Huffstedtler, Deputy Director; and Evonite Smith, Executive Assistant. No residents or members of the public were present for this hearing.





**SPRINGFIELD  
HOUSING  
AUTHORITY**

200 North 11th Street, Springfield, IL 62703  
Phone 217.753.5757 | TTY 217.753.5757 | Fax 217.753.5799  
[www.springfieldhousingauthority.org](http://www.springfieldhousingauthority.org)

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**SHA Commissioner Board Meeting  
Date: September 25, 2023**

**200 N. Eleventh Street  
Time: 5:00 p.m.**

**Will update after board meeting**

