

PHA Name : Washington County (MN)

PHA Code : MN212

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2025

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Washington County CDA 2025 MTW plan is to simplify how utility allowances are calculated and eliminate utility reimbursement payments. These two initiatives will further the objectives of greater effectiveness in federal expenditures and increase housing choice for low-income families. The plan is to simplify the utility allowance schedule with one amount depending on bedroom size only. An analysis of current allowances will determine the amounts used for each bedroom-sized unit and will be reviewed yearly.

Over the past few years, the CDA has been experiencing changes in how landlords charge tenants for utilities. Some are combining multiple utilities together and charging one additional fee. These fees are in addition to the rent and are included in the lease but do not fit under standard utility amounts. Moving to a set utility amount based only on bedroom size streamlines the gross rent calculation for participants moving and port-in's giving families. Participants will be able to search for a unit knowing exactly what the gross rent can be within the payment standard for unit size.

Eliminating utility reimbursement payments will create efficiency and cost savings. Currently, 95% of participants are eligible for additional Energy Assistance resources through state funded services. The 5% not eligible for other resources are over income for the assistance. The participant impact is minimal with an average of 7% receiving a utility reimbursement monthly and of those, 26% of the reimbursements are between one to seventeen dollars.

As a small agency in a large Metro area where over half of the participants are port-in's, the CDA continues to look for changes that are straight forward to communicate with the surrounding agencies and port-in participants. Through the Resident Advisory Board and additional MTW tenant meetings, the CDA learned that any changes to the program make participants uneasy and need to be done thoughtfully and communicated openly. The 2024 plan was to continue with the changes outlined in the 2022 plan.

The changes that have been implemented include the goals of efficiency, cost effectiveness, and increasing housing options for low-income families.

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	
j. Alternative Utility Allowance (HCV)	Plan to Implement in the Submission Year
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
o. Initial Rent Burden (HCV)	Currently Implementing
v. Alternative Income Inclusions/Exclusions (PH)	Currently Implementing
w. Alternative Income Inclusions/Exclusions (HCV)	Currently Implementing
2. Payment Standards and Rent Reasonableness	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
5. Housing Quality Standards (HQS)	
c. Third-Party Requirement (HCV)	Currently Implementing
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	

C. MTW Activities Plan that Washington County (MN) Plans to Implement in the Submission Year or Is Currently Implementing

1.j. - Alternative Utility Allowance (HCV)
<p>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</p> <p>The Agency will use an alternative method of calculating utility allowances by using one standard allowance based on bedroom size regardless of tenant utility responsibility and/or unit type. The Agency will continue to use the lesser of unit size or voucher unit size.</p> <p>The utility allowances were established by determining the standard utilities charged per bedroom size and building type. It was determined that 0–2-bedroom units' standard utilities were gas heat and all electric in multi-family units. The three- and four-bedroom units' standard utilities were gas heat, all electric and gas water heating for townhomes. Five and above bedroom units included gas heat, all electric, gas water heating, water, sewer, and trash for single-family homes. The amounts used to determine the allowance will be reviewed annually. The alternative method of calculating utility allowances meets the objectives of reducing cost and achieve greater cost effectiveness in federal expenditures and providing low-income families greater housing choice. Staff time will be saved in the calculation of utilities and families moving will know up front what gross rent is affordable.</p> <p>Utility Allowance Chart Zero bedrooms - \$81 One bedroom - \$98 Two bedrooms - \$120 Three bedrooms - \$206</p>

Four bedrooms - \$245

Five bedrooms - \$420

Six bedrooms - \$457

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

Cost effectiveness; Housing choice

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

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

No

Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.

The Agency will use an alternative method of calculating utility allowances by using one standard allowance based on bedroom size regardless of tenant utility responsibility and/or unit type. The Agency will continue to use the lesser of unit size or voucher unit size. The utility allowances were established by determining the standard utilities charged per bedroom size and building type. It was determined that 0–2-bedroom units' standard utilities were gas heat and all electric in multi-family units. The three- and four-bedroom units' standard utilities were gas heat, all electric and gas water heating for townhomes. Five and above bedroom units included gas heat, all electric, gas water heating, water, sewer, and trash for single-family homes. The amounts used to determine the allowance will be reviewed annually. The alternative method of calculating utility allowances meets the objectives of reducing cost and achieve greater cost effectiveness in federal expenditures and providing low-income families greater housing choice. Staff time will be saved in the calculation of utilities and families moving will know up front what gross rent is affordable.

Utility Allowance Chart

Zero bedrooms \$81

One bedroom \$98

Two bedrooms \$120

Three bedrooms \$206

Four bedrooms \$245

Five bedrooms \$420

Six bedrooms \$457

1.n. - Utility Reimbursements (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 Agency will eliminate utility reimbursements payments for Housing Choice Voucher participants. Under this initiative, the Agency goal is to save time calculating, tracking and issuing payment for utilities. This activity contributes to the larger initiative of cost effectiveness of federal expenditures.

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

Cost effectiveness; 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.

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

1.o. - Initial Rent Burden (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

Increase of maximum rent burden to 50% at move-in. The goal of this initiative is to give participants increased housing options. Increasing the initial rent burden gives families additional choice in units to rent that would otherwise be unaffordable. Washington County is an area of opportunity with excellent schools, employment opportunities and safe neighborhoods for families. This gives voucher holders the same opportunities as non-assisted tenants.

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.

Since January 2022 nineteen families have used the increased maximum rent burden to move into the county. The average percentage used by these nineteen families was 42% of income. This flexibility gave these families the opportunity to move into safe, decent housing with opportunities for jobs and for children to attend quality schools. Rents have continued to increase over the past year making it harder and harder for voucher holders to find housing. No changes to the initiative have been made since implementation.

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

No

Does the MTW activity require an impact analysis?

Provided Already

If the MTW agency plans to implement a new maximum income-based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?

50.00%

1.v. - Alternative Income Inclusions/Exclusions (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

The Agency allows self-certification of assets less than \$50,000. In addition, the Agency does not include any income from those assets in the calculation of tenant rent. This initiative meets the goal of program efficiency by decreasing staff time collecting documentation for annual recertifications.

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 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.

A self-certification form was developed for participants to sign confirming they have assets less than \$50,000. Staff save time trying to collect information from tenants. No changes have been made to policy since implementation.

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

No

What inclusions or exclusions will be eliminated, modified, or added?

Income from assets less than \$50,000 will be excluded from the tenant rent calculation

1.w. - Alternative Income Inclusions/Exclusions (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 Agency allows self-certification of assets less than \$50,000. In addition, the Agency does not include any income from those assets in the calculation of tenant rent. This initiative meets the goal of program efficiency by decreasing staff time collating documentation for annual recertifications.

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 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.

A self-certification form was developed for participants to sign confirming they have assets less than \$50,000. Staff save time trying to collect information from tenants. No changes have been made to policy since implementation.

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

No

What inclusions or exclusions will be eliminated, modified, or added?

Income from assets less than \$50,000 will be excluded from the tenant rent calculation

2.d. - Rent Reasonableness – 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 Agency performs a rent reasonable test using GoSection8.com on all units, including those owned by the agency. Prior to this initiative, the Agency used two different rent reasonable systems. This activity has contributed to the initiative of efficiency by saving the agency time and money by moving to one system.

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.

Quality assurance testing is done monthly on 5% of units to assure the third-party system is accurate. To date, the quality assurance test has shown no issues with the third-party system.

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

No

Please explain or upload a description of the quality assurance method.

Quality assurance reviews using other web based comparisons are performed on 5% of the rent reasonableness determinations monthly and results are tracked.

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.

The Agency contracts with GoSection8.com, a nationwide firm to do rent reasonableness data collection. The Agency uploads the local unit into the software and it produces the rent reasonableness determination. A copy of the determination is included in the tenant file.

No document is attached.

3.c. - Self-Certification of Assets (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

The Agency allows self-certification of assets less than \$50,000.

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.

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.

No changes have been made during the past year to this initiative. Participants self-certifying assets eliminates the need to collect bank statements and other asset documentation creating efficiency and time saving for both participants and staff.

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

No

Please state the dollar threshold for the self-certification of assets.

\$50,000.

3.d. - Self-Certification of Assets (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 Agency allows self-certification of assets less than \$50,000.

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.

No changes have been made during the past year to this initiative. Participants self-certifying assets eliminates the need to collect bank statements and other asset documentation creating efficiency and time saving for both participants and staff.

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

No

Please state the dollar threshold for the self-certification of assets.

\$50,000.

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 Agency conducts HQS inspections on units owned by the housing authority. The Agency has a third-party management company that provides property management including maintenance services offering a degree of separation between the Agency and the property manager. The activity is cost effective, allowing the same inspector to conduct all needed inspections for the program.

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.

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.

The Housing Assistance department has been conducting HQS inspections on Agency owned buildings since September 2022. The same standards are used for all units inspected with no differential treatment for Agency owned buildings. The Agency moved to a third-party inspector in 2023 for the majority of inspections, creating an additional separation from the inspection on agency owned units. Quality Assurance inspections are still conducted by Agency staff.

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 inspection standards will not be altered and will be available for review. Inspections are now being conducted by a contracted inspector. Quality assurance inspections are conducted by a CDA staff trained inspector to assure separation from contractor and QA inspections.

No document is attached.

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

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</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>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No</p>

E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received:				
	Does the MTW agency have any approved Agency-Specific Waivers?				
	Yes				
	Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
	Initial Inspection Alternative	No			
	Initial Inspection	No			

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.

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?

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
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.	
Occupied Number of Local, Non-Traditional units by	

Family Size:	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>	

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

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 (01/01/2025), 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.

Washington County Community Development Agency

MN 212

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).

Tammy Dasimbo
NAME OF AUTHORIZED OFFICIAL

Vice-Chair
TITLE

[Signature]
SIGNATURE

09/17/2024
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.*

MN 212 Washington County CDA

Comments and Responses

Resident Advisory Board met to review and discuss Capital Fund Program Statements and PHA Plans on August 22, 2024 virtually by Teams and in person at 7645 Currell Blvd, Woodbury, MN 55125.

Tenant Attendance: Steve R. and Diane P.

CDA representatives: Eric Schumacher, Housing Assistance Assistant Director and Karen McLeer, Project Manager

Prior to the meeting, the resident advisory board was provided a link the following:

- Capital Fund Program – 2023 and 2024 Annual Statements (A public hearing will be held on October 15, 2024)
- Capital Fund Program – 2025 Annual Statement
- Capital Fund Program – Five-Year Action Plan 2025-2029
- 2025 PHA Annual Plan
- 2025 MTW Plan
- 2025-2029 5 Year PHA Plan and 2020-2024 Accomplishments

Comments, discussion, and responses

Capital Fund Program – 2023 and 2024 Annual Statements:

The question was posed, “Why are the windows being replaced?” – the CDA responded that they are no longer efficient, can be difficult to operate, and are outdated.

Capital Fund Program – 2025 Annual Statement:

No comments

Capital Fund Program – Five-Year Action Plan 2025-2029:

Regarding installation of a permanent flagpole in 2026 – discussed the importance of lighting.

Regarding planting trees, shrubs and other landscaping in 2027 – discussed how this can be helpful for noise attenuation along with being visually appealing

Regarding replacement of entryway door and other exterior doors/locks in 2027 – discussed the importance of safety.

Regarding roof replacement in 2028 – discussed the difficulties of rubber membrane roof systems.

2025 PHA Annual Plan:

No comments

2025 MTW Plan:

Discussed the simplification of Utility Allowances by changing them to a flat allowance per bedroom size. A tenant indicated that it would make the moving process more straightforward and potentially easier to find a unit.

Discussed the elimination of Utility Reimbursement Payments which will create efficiency and cost savings. A tenant noted that this will allow for more staff time to be focused on other tenant issues.

Agency Analysis: no additional comments or action needed

2025-2029 5 Year PHA Plan and 2020-2024 Accomplishments:

A tenant stated that the CDA has accomplished a lot and looks to be headed in the right direction.

Safe Harbor

1j. Alternative Utility Allowance (HCV)

- i. The utility schedule must be based upon number of bedrooms, the property location, and/or the types of utilities paid by participant.

The utility allowances were established by determining the standard utilities charged per bedroom size and building type. It was determined that 0–2-bedroom units' standard utilities were gas heat and all electric in multi-family units. The three- and four-bedroom unit standard utilities were gas heat, all electric and gas water heating for townhomes. Five and above bedroom units included gas heat, all electric, gas water heating, water, sewer, and trash for single family homes.

- ii. The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.

The Agency will use the Regional Utility Allowance schedule developed by the Metropolitan Council and adjust as needed if there is a change of 10% or more. Documentation of the schedule will be maintained.

- iii. The agency must not include items in the utility schedule that are excluded under HUD regulations.*

The Agency will only use items in the utility schedule as allowed by HUD regulations.

Issue Addressed with Initiative

Over the past few years, the CDA has been experiencing changes in how landlords charge tenants for utilities. Some are combining multiple utilizes together and charging one additional fee. These fees are in addition to the rent and are included in the lease but do not fit under standard utility amounts. Moving to a set utility amount based only on bedroom size streamlines the gross rent calculation for participants moving and port-in's giving families. Participants will be able to search for a unit knowing exactly what the gross rent can be within the payment standard for unit size.