



ANN ARBOR HOUSING COMMISSION

**July 1, 2023 – June 30, 2024
One Year Annual Plan
And
MTW Supplement Plan**

Streamlined Annual PHA Plan (HCV Only PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																																			
A.1	<p>PHA Name: ANN ARBOR HOUSING COMMISSION PHA Code: MI064</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2024</p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Housing Choice Vouchers (HCVs) 2205</p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Participating PHAs</th> <th style="width: 10%;">PHA Code</th> <th style="width: 25%;">Program(s) in the Consortia</th> <th style="width: 20%;">Program(s) not in the Consortia</th> <th style="width: 20%;">No. of Units in Each Program</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	Lead HA:																													
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B.	Plan Elements.
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Informal Review and Hearing Procedures.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification.</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</p>
B.2	New Activities. – Not Applicable
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in its 5-Year PHA Plan.</p>
B.4	Capital Improvements. – Not Applicable
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N N/A</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	Other Document and/or Certification Requirements.
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> See attachment</p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements. See attachment</p>

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing (AFFH).

Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:
<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>
Encourage accessible affordable housing units near transit or other key services at activity centers through zoning changes. Support local units or implement zoning strategies to develop housing products in single family neighborhoods. Encourage the use of publicly owned land in high opportunity markets for affordable housing or proceeds go toward affordable housing Prioritize public subsidies/incentives for affordable housing developmets in high opportunity markets. For publicly supported housing, coordinate rental inspection process between HUD, MSHDA, and local regulations to avoid duplicative administrative burden.

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Instructions for Preparation of Form HUD-50075-HCV

Annual PHA Plan for HCV-Only PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **Number of Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

B. Plan Elements. All PHAs must complete this section. ([24 CFR §903.11\(c\)\(3\)](#))

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR 5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR § 903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(2\)\(i\)](#)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. ([24 CFR §903.7\(b\)](#))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. ([24 CFR §903.7\(c\)](#))

Rent Determination. A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. ([24 CFR §903.7\(d\)](#))

Operation and Management. A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. ([24 CFR §903.7\(e\)](#)).

Informal Review and Hearing Procedures. A description of the informal hearing and review procedures that the PHA makes available to its applicants. ([24 CFR §903.7\(f\)](#))

Homeownership Programs. A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. ([24 CFR §903.7\(k\)](#))

Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA’s partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA’s partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) and under requirements for the Family Self-Sufficiency Program and others. Include the program’s size (including required and actual size of the FSS program) and means of allocating assistance to households. ([24 CFR §903.7\(l\)\(i\)](#)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. ([24 CFR §903.7\(l\)\(iii\)](#)).

Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#))

Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan.

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

- B.2 New Activities.** This section refers to new capital activities which is not applicable for HCV-Only PHAs.
- B.3 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.11(c)(3), 24 CFR §903.7(r)(1))
- B.4 Capital Improvements.** This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs
- B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements.

- C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
- C.2 Certification by State of Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).
- C.4 Challenged Elements.** If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: “To implement goals and priorities in an AFH, strategies and actions shall be included in program participants’ ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing” Use the chart provided to specify each fair housing goal from the PHA’s AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 6.02 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality

Definitions and Acronyms

AAA IB: Ann Arbor Area Agency on Aging.

ACOP: Admissions and Continued Occupancy Policy. The policies and procedures that the Housing Commission has adopted, based on HUD and local regulations, that govern public housing units.

Administrative Plan: The policies and procedures that the Housing Commission has adopted, based on HUD and local regulations, that govern voucher programs.

AMP: Asset Management Project. In 2007, HUD required Housing Authorities with more than 250 units, to organize and manage those units into multiple AMPS. Ann Arbor divided its units into an East and a West AMP.

CAN: Community Action Network. A nonprofit service provider located at the Northside Community Center. The AAHC contracts with CAN to directly serve public housing residents at Hikone and Green Baxter Courts. CAN also received a ROSS grant to serve all public housing residents become self-sufficient.

CSTS: Community Support and Treatment Services. Formerly Community Mental Health. The AAHC contracts with CSTS to provide services to residents primarily at Miller and Baker.

FMR: Fair Market Rent. HUD determines the Fair Market Rent by doing a rental market study and uses the 40th percentile of rental rates by unit size from the previous 2 years (not including new units and subsidized units).

FSS: Family Self Sufficiency program. A HUD program that encourages communities to develop local strategies to help voucher families obtain employment that will lead to economic independence and self-sufficiency.

HAP: Housing Assistance Payment. A HAP contract is executed between the AAHC and a private landlord that has signed a lease with a Section 8 tenant so that the AAHC can pay the landlord a rent subsidy.

HCV: Housing Choice Vouchers. Formerly known as Section 8 vouchers. These vouchers are tenant-based vouchers unless they are specially designated as project-based vouchers. Tenant vouchers are attached to the tenant and provide a rent subsidy at whatever qualified unit a tenant moves to. Project based vouchers are attached to the unit so that any qualified tenant who lives in that unit, receives a rent subsidy.

HQS: Housing Quality Standard. A unit must be inspected to make sure that it meets the HQS standard before a unit is approved for a tenant with a Voucher.

MTW: Moving to Work is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally-designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families.

PEACE: Peace Neighborhood Center. A nonprofit service provider located on North Maple Road. The AAHC contracts with Peace to directly serve public housing residents at Maple Meadows and North Maple Estates.

PIC: HUD's inventory management system that the AAHC must report to HUD the inventory, condition, and occupancy of the public housing units.

PHA: Public Housing Authority. i.e Ann Arbor Housing Commission

PHAS: Public Housing Assessment System. HUD uses 10 indicators (such as occupancy rate, and accounts receivable from tenants) to monitor and rate Public Housing Authorities across the nation for their public housing properties.

PNA: Physical Needs Assessment. Conducted by an outside contractor to provide a guide to the AAHC on the physical condition of the buildings, the life expectancy of building features such as the roof or boiler, as well as the replacement cost.

ROSS-SC: Resident Opportunity and Self Sufficiency Service Coordinators. This three-year HUD grant will support the AAHC's tenants to earn skills, find employment and become self-sufficient.

SEMAP: Section Eight Management Assessment Program. HUD uses 15 indicators (such as HQS inspections, occupancy rate, and rent reasonableness) to monitor and rate Public Housing Authorities across the nation for their voucher programs (previously Section 8).

City of Ann Arbor Housing Commission

TOTALS			
Location	Yr Built	# of Units	Addresses
Baker Commons (RAD PBV)	1980	64	106 Packard
Broadway Terrace (PBV)	1956	20	1504 - 1506 Broadway
Garden Circle (Turnkey)	1971	1	2072 Garden Circle
Green Baxter Court (RAD PBV)	1970	23	1701 - 1747 Green Road
Hikone (RAD PBV)	1970	29	2702 - 2760 Hikone
Hillside Manor (PBV)	1996	6	1020 - 1042 Pennsylvania
Creekside (RAD PBV)	2021	32	3421 - 3429 Platt
Mallett's Creek (PBV)	1996	6	2670 -2680 South Main St
Maple Meadows (RAD PBV)	1970	29	800 - 890 South Maple
Miller Manor (RAD PBV)	1971	106	727 Miller
North Maple Estates (RAD PBV)	2016	42	657 - 741 North Maple
North Maple Duplexes (PBV)	1998	4	743 - 749 North Maple
Oakwood (PBV)	1969	3	3565 - 3685 Oakwood
South Seventh (PBV)	1969	8	221 - 253 S. Seventh
Upper Platt (Colonial Square)	1964	5	3681 -3689 Platt
West Washington (PBV)	1969	2	805 - 807 W. Washington
White/State/Henry (RAD PBV)	2021	32	1510 White, 1527 State, & 705 Henry
Lurie Terrace (Senior Housing)	1964	136	600 W. Huron
Summation			

AAHC FISCAL YEAR 2023 ANNUAL PLAN

Annual Plan Attachment

Section B.1 Annual Plan Element Proposed Changes FY23

Statement of Housing Needs and Strategy for Addressing Housing Needs.

- A. **Housing Choice Voucher Waiting List.** The AAHC currently has the following preferences: persons with a disability, resident or works in Washtenaw or Monroe County, seniors and homeless. AAHC opened the HCV Waiting List for one month, on August 3, 2020; we received over 3,300 applications. At that time, about 50% of the AAHC’s voucher tenants reported as non-elderly disabled households. Below are the demographics as reported by the applicants:

HCV Waiting List

White	742
Black	2269
Asian	28
American Indian	20
Pacific Islander	2
Multiple Race	219
No Identification	0
Hispanic	144
Non-Hispanic	3199
Female	2612
Male	731
Average Annual Income	\$11,427
Average Household Size	2
Near Elderly (Age 55-60)	499
Elderly (Age 62 and older)	225
Disabled	2268
Homeless	1332

- B. **Project Based Voucher Waiting List:** The AAHC currently has the following preferences: persons with a disability, resident or works in Washtenaw or Monroe County, seniors and homeless. AAHC opened the RAD PBV Waiting List for one month, on August 3, 2020. AAHC advertised the opening for one (1) through five (5) bedroom units; and received over 2,200 applications. At that time about 43% of the applicants self-reported as homeless and 35% reported annual income of less than \$10,000. Below are the demographics as reported by the applicants:

PBV Waiting List

White	566
Black	1463
Asian	19
American Indian	12
Pacific Islander	2
Multiple Race	153
No Identification	0
Hispanic	91

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Non-Hispanic	2175
Female	1715
Male	551
Average Household Size	2 Persons
Near Elderly (Age 55-61)	342
Elderly (Age 62 and older)	181
Disabled	1496
Homeless	979
Reported Income between \$1 – \$9,999	35%
Reported Income between \$10,000 – \$19,999	26%

During FY22, the following administrative policies were adopted by the AAHC Board

Administrative Plan Policies

5-BRIEFING AND VOUCHER ISSUANCE

When HCV participant are issued a voucher the regulation states that the voucher must be utilized before it expires. HUD requires the initial voucher term to be at least 60 days. HUD allows the PHA to establish a policy to determine the length of the voucher term. The previous AAHC policy stated that the voucher term would be 60 days (not including any extensions). AAHC amended the policy to allow a minimum of 180 days voucher term with a maximum of 240 days as a reasonable accommodation for persons with disabilities or in extenuating circumstances.

9-GENERAL LEASING POLICY: TERM OF ASSISTED TENANCY

HUD requires the AAHC to establish a general leasing policy that states the term of the tenant lease. The regulation permits the PHA to allow a lease term less than 12 months under certain conditions. AAHC amended the policy to allow families to enter a lease with a landlord shorter than 12 months to improve housing opportunities for the tenant because leases with shorter than 12-month lease terms have become a regular practice in the market.

10-MOVES WITH CONTINUED ASSISTANCE

When an HCV applicant or participant requests to move outside of the AAHC’s jurisdiction, that family may be denied the request to move for several reasons, such as owing a debt to the AAHC. The AAHC policy previously allowed the family to move under the establishment of a repayment agreement. AAHC amended the policy to require the family to resolve all debts owed to the AAHC prior to moving outside the AAHC’s jurisdiction.

15-INTRODUCTION: SPECIAL HOUSING TYPES

Previously, the policy restricted voucher participants to reside in units qualifying as special housing types as a reasonable accommodation only. The AAHC amended the policy to allow all households to live in any special housing types and a reasonable accommodation will not be necessary.

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15-INTRODUCTION: SPECIAL HOUSING TYPES; HOMEOWNERSHIP

Previously, the policy stated that participants interested in homeownership must have a down payment of at least 3% of the sales price, with at least 1% coming from the participants personal funds. This policy was waived for participants who purchased a home with Habitat for Humanity. The policy was changed to require down payment of at least 1% of the sale price of the home. And, this policy would be waived for any participant who purchase a home using a mortgage product designated for low-income first time home buyers.

16-PROGRAM ADMINISTRATION: INFORMAL REVIEWS AND HEARINGS

AAHC added language to the administrative plan to make it clear that applicants and participants who voluntarily withdraw from the housing choice voucher program are not entitled to an informal review or informal hearing. However, applicants and participants would continue to have the right to an informal review and informal hearing when the AAHC initiates the denial of assistance or termination, as required under federal regulations.

16-PROGRAM ADMINISTRATION: EMERGENCY TRANSFER

AAHC amended its Emergency Transfer policy to clearly define the eligibility requirements for families requesting to transfer, to create a distinction between VAWA related transfers and non-VAWA related transfers, and to establish procedures for participants requesting to transfer.

16-SETTING PROGRAM STANDARDS AND SCHEDULES: PAYMENT STANDARD

AAHC added language to the administrative plan to allow the voluntary use of HUD determined small area fair market rents (SAFMRs) for one or more zip codes. The AAHC adopts the use of SAFMRs for both the tenant-based and project-voucher program specifically for 48103, 48104, 48105, and 48109.

19-FAMILY SELF-SUFFICIENCY PROGRAM: PROGRAM OPERATIONS

The AAHC amended its policy that describes the handling of balances owed to the AAHC or private property owner and the treatment of unreported income as it is related to FSS Escrow monthly disbursements. The policy clearly states that if a family has unreported income, once that unreported income is recorded, it will not result in an increase in their FSS escrow amount. In addition, the policy clearly states that any amounts owed to the AAHC or private property owner will be deducted from the FSS escrow balance prior to distributing the escrow to the family when they graduate from the FSS program.

In addition, in June 2022 HUD made several changes to the program regulation which required housing authorities who administered the program to revise their FSS Action Plan. The AAHC revised the FSS Action Plan to capture all the changes made by HUD. The action plan was then submitted to HUD for approval. HUD has approved the AAHC FSS Action Plan changes effective November 4, 2022.

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Financial Resources:

2023 Planned Financial Sources and Uses		
Federal Sources:	Planned (Est.)	Planned Uses
Moving to Work Housing Choice Voucher Housing Assistance Payments (HAP) & Admin Fees	\$18,000,000	HCV and PBV HAP & Admin Expenses
EHP/VASH/FUP Housing Choice Voucher Housing Assistance Payments (HAP)	\$2,000,000	EHV/FUP/VASH HAP
EHP/VASH/FUP Admin Fees	\$175,000	EHV/FUP/VASH Admin Expenses
Mainstream Voucher Program Housing Assistance Payments (HAP)	\$2,000,000	HAP Expenses
Mainstream Voucher Admin Fees	\$175,000	Administrative Expenses
Family Self Sufficiency	\$180,000	Family Self Sufficiency program
Other (Fraud Recovery)	\$76,000	Voucher Programs and Central Office
Capital Funds & Operating Funds for Turnkey III	\$4,000	Garden Circle (MI064000100)
Non-federal sources (list below)		
City of Ann Arbor General Fund	\$160,000	Voucher Administration, Central Office,
Affordable Housing Millage	\$6,500,000	Affordable Housing Development, Tenant Services, and Administrative Expenses
Mental Health Millage Rebate	\$1,100,000	Tenant Services and Administrative Expenses
Ann Arbor Downtown Development Authority	\$600,000	Development of City-Owned Properties in DDA District
Other Revenue	\$900,000	Property Management Fees
Total resources	\$33,870,000	

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Section B.2 New Activities

Moving to Work: AAHC was designated as a Moving-To-Work (MTW) agency in January 2022. MTW is a demonstration program for Public Housing Authorities (PHAs) to design strategies to help residents find or increase employment, become financially self-sufficient and increase housing opportunities for low-income households. The MTW program allows the AAHC more flexibility with how voucher program funds are administered. AAHC was selected in MTW Cohort #4 Landlord Incentives. AAHC will use the exemption allowed under MTW to establish strategies to increase and continue landlord participation on the HCV program and increase the successful lease-up and long-term housing stability of voucher participants. The MTW program objectives are to reduce costs, give households incentives to achieve economic self-sufficiency, and to increase housing choice. The intent is to serve the same number of low-income families as without MTW funding flexibility. The AAHC will continue to serve a mixture of family sizes. The AAHC will ensure that 75% of the families assisted will have incomes at or below 50% of area median income. All assisted units will continue to meet housing quality standards (HQS). Finally, the AAHC will establish a reasonable rent policy that will encourage self-sufficiency for participating families.

Garden Circle Turnkey III: The AAHC owns a single-family home on Garden Circle, Ann Arbor MI, that was acquired through HUD's Turnkey III lease to ownership program. The Turnkey III program no longer exists and the families that have lived in this home have not been able to purchase the property. The AAHC will dispose of the property through the Streamlined RAD Conversion for Small PHA's process. The property will be retained by the AAHC by ground leasing the property for \$1 to a wholly owned subsidiary of the AAHC, Colonial Oaks, LLC. Colonial Oaks currently includes 50 former public housing units that were converted to project-based vouchers under the RAD program.

The existing tenant may continue to live at the property with a project-based or tenant protection voucher or move with a tenant-based voucher. Staff held the first mandatory resident meeting on March 10, 2023.

If there are any proceeds from the disposition of the property, after deducting the reasonable and necessary costs of disposition, the proceeds will be spent on renovations of existing low-income properties under a PBV HAP contract in the Colonial Oaks portfolio, including: 2072 Garden Circle, 1504 – 1506 Broadway, 3681 – 3689 Platt, 2670 - 2680 S. Main, 1020 - 1042 Pennsylvania, 221 – 253 S. Seventh, 3565 – 3585 Oakwood, and 805 – 807 W. Washington. .

Faircloth to RAD: the AAHC has 3 additional units under the Faircloth regulations that can be developed under the RAD conversion process. The AAHC is exploring the process and best locations to develop 3 additional subsidized housing units at properties it currently owns or is currently developing.

The Ann Arbor City Council passes a resolution to support an analysis of city-owned properties to determine if they are financially feasible to develop as affordable housing. The analysis was completed by the AAHC, and 10 properties were identified as good locations for affordable housing development. Each site is unique and will have a separate plan for its development. Properties were analyzed based on zoning, regulatory restrictions, environmental conditions, and eligibility for HUD and LIHTC funding. The AAHC spent 2 years on community engagement to

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understand the priorities of the community and to start discussing site concepts. Four properties are in the zoning and site plan development stage, two properties are in the pre-development due diligence phase, and four properties are in the queue until staff have the capacity to complete pre-development due diligence.

The City of Ann Arbor passed an affordable housing millage for 1 mil for 20 years, which will raise about \$6.5 million annually. It is anticipated that the millage will support the development (new construction, acquisition, and renovation) of approximately 1500 new affordable housing units for households up to 60% of the Area Median Income (AMI). The millage also allows for up to 20% of the funds to be used for tenant supportive services. The millage is a key component of the development strategy for the 10 city-owned properties to provide gap financing and tenants service funding.

Section B.6 Progress Report

Please see the 4 goals from FY20 – FY24 Plan with a progress report for each goal

- 1) Complete Redevelopment of all public housing units to Project Based Vouchers through the Rental Assistance Demonstration (RAD) project

The AAHC was approved by HUD to redevelop all its public housing to project-based vouchers under the RAD program. Phases 1, 2, 3, 4, & 5 are completed. The single-family Turnkey III home on Garden Circle is the only property that has not converted yet.

- 2) Develop new affordable housing:
 - a. At existing public housing sites
 - b. New properties

a. Through the RAD conversion program, AAHC demolished and built new housing at 3 former public housing properties. A total of 58 new apartments were added through the RAD conversion process. Phase 1, Miller Manor, was redeveloped with three (3) additional apartments. Phase 3 at N. Maple added 23 apartments. Phase 4 at Lower Platt (now known as Creekside Court) added 28 apartments and White/State/Henry (now known as State Crossing) added 4 apartments.

b. The AAHC has acquired Lurie Terrace, a 136-unit senior apartment in Ann Arbor. The AAHC will be income restricted as well as restricted to households who are 62 years or older. Forty percent of the units will be restricted to households at 60% AMI or less and 60% will be restricted to households at 80% AMI or less. Any existing over-income tenants will be grand fathered in, but all new tenants must meet the income-restrictions.

The following city-owned properties are in the development stage:

- 121 E. Catherine: proposed 66-unit project with 50% of the units reserved for supportive housing and 50% reserved for low-income households in the creative sector. All units would be affordable to households up to 60% AMI.
- 350 S. 5th: Approved zoning and supplemental regulations that require a minimum of 40% (approximately 145) affordable units affordable for households up to 60% AMI in a 2-tower building.

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- 415 W. Washington: proposed residential building with about 125 units, 15% of which would be affordable to households up to 60% AMI or a cash contribution to the Affordable Housing fund in lieu of including units on site.
- 2000 S. Industrial: proposed mixed-use site including residential and City uses such as offices, storage, and fleet services
- 1510 E. Stadium: conducting due diligence
- 721 N Main: conducting due diligence

3) Project-Based Voucher:

Increase the number of Project-Based Vouchers in the City of Ann Arbor and other communities in Washtenaw County that have a strong economic base and public transportation. AAHC projects that we will convert about 200 vouchers to project-based vouchers by FY24.

In addition, 23 VASH vouchers for chronically homeless veterans were project-based through a partnership with the VA.

- a. Addition of PBV Units: The AAHC issued Project-Based Voucher RFP on September 9, 2020, for up to 150 vouchers in the City of Ann Arbor. The AAHC received applications for 162 project-based vouchers. The AAHC has entered into agreement for 79 vouchers within Ann Arbor for the following projects: 33 vouchers at 100 S. 4th Ave 48104, 30 vouchers at 600 W. Huron 48104, 10 vouchers at 2270 Platt Road 48108, and 6 vouchers at 100-106 and 112-114 Glendale 48103. The AAHC issued a Project-Based Voucher RFP on February 2, 2023, for up to 175 vouchers in the City of Ann Arbor. The AAHC received applications for 50 project-based vouchers. The AAHC conditionally approved 50 vouchers with the following projects: 18 vouchers Hickory Way III and 32 vouchers 121 E Catherine.
- b. Statement of need Consistent to PHA Plan: AAHC will project-base up to 20% of the AAHC's budget authority to de-concentrate poverty and expand housing and economic opportunities for very low-income, homeless, and special needs households in the City of Ann Arbor and other high opportunity areas in Washtenaw County. The AAHC prioritizes PBV on Permanent Supportive Housing units. These activities are consistent with the AAHC's 5-year and Annual Plan as well as AAHC's mission.
 - i. The AAHC was approved by HUD on December 27, 2022, to project base up to 125 additional vouchers. An RFP will be issued in 2023.

- 4) Increase supportive housing for residents with complex needs spanning from homelessness, mental illness, substance use disorders, and/or other physical/mental disabilities.
 - a. Increase support services for tenants in affordable housing and voucher program
 - b. Through community partnerships
 - c. Additional funding sources
 - d. Continue to work with partners and provide support to eligible families

Continuum of Care (CoC)

The AAHC partnered with Avalon Housing and Ozone House to provide housing and services to chronically homeless individuals and families through the HUD Continuum of Care program. A minimum of 59 of these households will be housed at AAHC properties

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and Avalon and Ozone House will be providing on-site services. These funds have enabled Avalon to provide 24/7 services at Miller Manor. In FY21 all of the CoC grants have been transferred to Avalon Housing to administer.

Support Service HCV Eviction Prevention

The AAHC is partnering with SOS to hire a case manager to help AAHC voucher tenants maintain their vouchers.

The coordinated support service allows assist families to lease up in Ann Arbor and resolve landlord/tenant issues such as securing funds to avoid eviction and/or assistance with securing funds for outstanding utility bills and were able to retain their housing. AAHC will continue contracting services with SOS to provide voucher families assistance in maintaining their assistance.

Support Service On-site PBV

The AAHC partnered with Avalon Housing & Peace Neighborhood Center & Community Action Network to provide on-site services for tenants at West Arbor, Miller Manor, Maple Meadows, Hikone, Green-Baxter, and Baker Commons.

The AAHC is partnering with CAN and Avalon to provide on-site services at the new State Crossing and Creekside Court Community Centers, respectively.

The AAHC is partnering with Huron Valley PACE to provide on-site services at the newly acquired senior housing property, Lurie Terrace.

Additional Voucher Support Services

The AAHC is partnering with Avalon Housing and Michigan Ability Partners to assist AAHC voucher waitlist applicants lease up successfully and to provide ongoing support services.

Family Unification Program (FUP)

The AAHC has partnered with the Michigan Department of Health and Human Services (MDHHS), Washtenaw County Continuum of Care (CoC), and Ozone House to provide housing assistance to 32 families for the HCV Family Unification Program. AAHC continues to provide housing to eligible families.

The Family Unification Program (FUP) is a program under which Housing Choice Vouchers (HCVs) are provided to two different populations: Families for whom the lack of adequate housing is a primary factor in: the imminent placement of the family's child or children in out-of-home care, or the delay in the discharge of the child or children to the family from out-of-home care. In addition, Eligible youths who have attained at least 18 years and not more than 24 years of age and who have left foster care, or will leave foster care within 90 days, and is homeless or is at risk of becoming homeless at age 16 or older.

In addition to rental assistance, supportive services must be provided by the MDHHS to FUP youths for the entire 18 months in which the youth participate in the program;

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examples of the skills targeted by these services include money management skills, job preparation, educational counseling, and proper nutrition and meal preparation.

Non-Elderly Disabled Mainstream Voucher (NED)

The AAHC has partnered with 11 agencies to administer the NED Voucher program, all of whom serve persons with disabilities as a cornerstone of their non-profit mission or public agency purpose. HUD awarded AAHC 45 voucher for the NED program in 2018; 90 vouchers in 2019; and 41 vouchers in 2020. AAHC continues to provide housing to eligible families.

NED HCVs enables non-elderly disabled families to lease affordable private housing of their choice. NED vouchers also assist persons with disabilities who often face difficulties in locating suitable and accessible housing on the private market. The target population for the NED program are any household that includes one or more non-elderly person with disabilities.

In addition, eligible families included non-elderly persons with disabilities who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, currently experiencing homelessness, or those at risk of experiencing homelessness.

Emergency Housing Vouchers

AAHC received an award of 29 Emergency Housing Vouchers (EHV) effective July 1, 2021. The Emergency Housing Voucher (EHV) program is available through the American Rescue Plan Act (ARPA). Through EHV, AAHC assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability.

AAHC works with the CoC and its other homeless services/victim services referral partners in determining which activities it will undertake in support of EHVs participants. Activities such as housing search assistance, assistance with security deposit, utility deposit, rental application, holding fees, and other related uses are intended to prevent and respond to housing instability.

Additional Vouchers

In October 2022, AAHC received 16 new voucher increments from HUD. Due to a competitive rental market around the country, it's increasingly becoming necessary to help families lease units. As a result, HUD revisited its current guidance on the eligible uses of administrative fees allowing PHA's to expanding such activities to cover costs that encourage housing stability for participants. To ensure success, AAHC administers funds directly to our partners that provide services to participating families that fit their specific needs.

Administrative activities also include housing search assistance activities such as pre-move counseling, helping a family identify and visit potentially available units during their housing search, helping a family find a unit that meets the household's disability-

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related needs, providing transportation and directions, and assisting with the completion of rental applications. These activities also include post-lease up activities often related to housing search assistance efforts, such as post-move counseling and landlord/tenant mediation. These activities cover HCV owner recruitment and outreach activities, including the costs associated with materials or webpages specifically geared to owners, as well as landlord liaison staff and associated expenses.

City of Ann Arbor General Fund Support

The City of Ann Arbor allocated \$525,000 in FY20; \$535,000 in FY21; \$546,000 in FY22 and over \$1.1 million in FY23 for tenant mental health and other supportive services for AAHC tenants and Voucher program participants. These funds are partially funding the programs listed above.

Section B.7 Resident Advisory Board

The Resident Advisory Board (RAB) held on November 9, 2022

This annual public, meeting of the Resident Advisory Board focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program as a member of Cohort #4— Landlord Incentives.

ATTENDEES: Weneshia Brand (AAHC), Bryce Allmacher (AAHC), Beth Yaroch (AAHC), Terrence Williams, Melanie, Leo, Hugh Goodman, Nicole Harris, Ambrose Rivers, Sarah Teare. Timothy Haremza, John Stacy, Morgan Borchardt, Dory Boston, Mary Doyle, Kimmeka Pipkins, and Jason Pope.

DISCUSSION:

Brand: AAHC staff can be reached for additional comments and questions at www.a2gov.org/housingcommission

Landlord Incentives

AAHC is a participant in Moving To Work Cohort #4— Landlord Incentives. Participation in this cohort provides AAHC the opportunity to adopt policies that incentivize landlord participation in the Section 8 Voucher program. AAHC plans to provide damage loss payments, signing bonuses, and vacancy loss payments to landlords that rent to Section 8 Voucher participants. AAHC also plans to assist participants with providing security deposits and paying application fees.

The Ann Arbor Housing Commission also discussed the following MTW policies under consideration for future adoption, with the Resident Advisory Board:

Reasonable Rent Activity: Tiered Rent

As an MTW activity, AAHC is considering a tiered rent system. The tiered rent program would group rents together based on income. Calculation: monthly income based on the bottom of a participant's income tier X 25% + \$50. Example: those with an annual income of \$10,000-14,999 would all pay \$258.33 per month in rent ($\$10,000/12 \times 25\% + \50), as opposed to the current rent calculation in which all participants pay 30% of their monthly income towards rent (plus any amount that exceeds the voucher payment standard). Participants will not experience an increase in rent if their income rises within their own tier. Example: if a participant's income increases from \$11,000 to \$13,000 per year, their rent contribution does not increase. If,

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however, their income was to increase beyond \$14,999, their rent contribution would increase to that of the next income tier upon their next income certification. Participants experiencing a hardship as defined by AAHC policy would be allowed to request an interim reexamination of income if they experience a decrease in income below their current tier to reduce their rent contribution.

Alternative Reexamination Schedule

In addition to the tiered rent policy, AAHC is considering a policy that would stipulate that income recertifications take place every 3 years rather than annually. This would allow participants to pocket increases in income for longer rather than having their rent raised more quickly upon recertification. Example: elderly families experience increases in Social Security income almost annually. The alternative schedule would allow these families to keep that increase rather than contributing it toward rent until their next recertification.

Alternative Income Inclusions and Exclusions

AAHC is also considering implementing alternative income exclusions and inclusions which would allow families to deduct income from additional sources in making rent determinations. AAHC is considering excluding income from adult children ages 18-24 in making rent determinations.

Resident Advisory Board Discussion:

Rivers: How long do you have to find housing once you receive your Section 8 Voucher?

Brand: 180 days

Rivers: Can Homeownership voucher assistance be used in Combination with Neighborhood Assistance Corporation of America (NACA) mortgage products?

Brand: Yes.

Haremza: What is the procedure when a person has a Section 8 Voucher and the individual gets married, how is their income adjusted? Will their rent change?

Brand: A lot of landlords require families to add additional people to the lease. It is the family's responsibility to accurately report their income to AAHC. There is a strong possibility that the tenant's portion of the rent will change if the spouse has income.

Haremza: Is there any relationship between Ann Arbor Housing Commission and Avalon Housing?

Brand: Yes, Avalon are one of many non-profit partners the AAHC has contracts with.

Pipkins: Question about Platt Rd. property (Creekside Court): is that property available to Section 8 participants, or only AAHC participants?

Brand: For Creekside specifically, that property is Project-Based Vouchers only, so people with tenant-based Section 8 vouchers can't apply there. However, if you applied to the PBV waitlist and were offered a unit, you would need to withdraw from the tenant-based voucher program to move into Creekside.

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The new AAHC developments plan to be mostly a mixture of incomes. For example, a 30-unit building might have 10 units that are Project-Based Vouchers (subsidy is attached to the unit, but the family is eligible for a tenant-based voucher after 1 year), 10 units that are market-rate, and 10 units that are below-market rate based on tax credit rent requirements. If you have a tenant-based voucher, you can use it as long as you are not “doubling up” on assistance (i.e. using a Section 8 Voucher in a Project-Based unit).

Pipkins: When do you plan to implement the policies regarding security deposit assistance?

Brand: Possibly in this upcoming fiscal year, inquire with your caseworker to see if funding is currently available.

Pipkins: Inquired about a Habitat for Humanity program— Habitat required an income of at least \$70,000 to qualify for their Homeownership program, that doesn't seem like it would qualify as low-income.

Brand: You can always google Area Median Income (AMI) to determine what is low-income, in Washtenaw County, because incomes are so high in Washtenaw County [\$117,800 is the Area Median Income], that number makes sense as low-income. With the AAHC Homeownership Program, the voucher itself is counted as income towards your loan. This allows our participants to get approved for larger loans than what their income would typically dictate. The voucher doesn't help with down payment or closing costs, but it does provide monthly Housing Assistance Payments to assist with your mortgage principal, interest, taxes, and insurance.

Harris: How long do you have to be on the Section 8 program before you can qualify for the Homeownership program?

Brand: 1 year, and Family Self Sufficiency participation is not required.

Haremza: Concerned about the amount of time in between income recertifications with the tiered rent policy. What if a participant loses a significant source of income?

Brand: The AAHC would implement a hardship policy to mitigate any potential negative effects of the tiered rent system. The idea of tiered rents is to incentivize increases in income. Reiterates that this is the time to influence the hardship policy.

Haremza: A hardship policy sounds like it would address some concerns. For example, if your company moves because there aren't enough skilled workers in your area, that should count as a hardship.

Haremza: Likes the idea of excluding income from adult children.

Brand: Alternative inclusions/exclusions as proposed here only apply to very specific households.

Haremza: Does the AAHC consider cost-of-living expenses in the area? Increases in social security are typically negated by increases in cost-of-living.

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Brand: AAHC does not. However, the benefits of both the tiered rent and the alternative recertification schedule apply. It's more money in your pocket unless and until at your recertification you enter a higher income tier. Provides participants the opportunity to pay off debt, pay for school, save for a home, and increase assets.

Harris: Most places that do low-income housing make you recertify as soon as your income increases, for AAHC would the participant owe that money retroactively if they didn't report an increase in income immediately?

Brand: No, they wouldn't have to report their increase until their next schedule recertification

Harris: Does AAHC account for any other expenses in making rent determinations? Things like car repairs?

Brand: No. AAHC considers utilities, medical expenses, and dependent care, as required by HUD. Families currently receive a \$480 allowance for each minor living in their home. It is possible that AAHC could increase that amount to \$500+ as a policy. It is not the same idea as Harris' question, but it could have the same effect.

Pipkins: Net vs. gross income, is there a way for the Housing Commission to account for the difference in making rent determinations?

Brand: Would need to do more research.

Pipkins: When AAHC takes policy into consideration, when do residents enter the conversation?

Brand: Residents are the #1 source of justification for these policy changes. Our residents share their challenges and make suggestions with AAHC staff every day. These Resident Advisory Board meetings are also extremely important to receive resident ideas and feedback about policy recommendations. In addition, residents can attend AAHC board meetings, which are on the third Wednesday of the month every month and are open to the public. We have a tenant and a former tenant on the board as well.

OTHER RESIDENT INPUT: *None*

CHALLENGED ELEMENTS TO PLAN: *None*

Civil Rights Certification
(Qualified PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 3/31/2024

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning 2024 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency 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), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

ANN ARBOR HOUSING COMMISSION

MI064

PHA Name

PHA Number/HA Code

I hereby certify that all the statement above, 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)

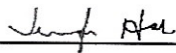
Name of Executive Director:

Jennifer Hall

Name of Board Chairperson:

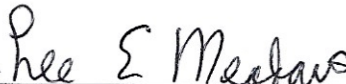
Dr. Lee Meadows

Signature



Date 5/27/2023

Signature



5-30-2023
Date

The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**Certification by State or Local
 Official of PHA Plans Consistency
 with the Consolidated Plan or
 State Consolidated Plan
 (All PHAs)**

U. S Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2024

**Certification by State or Local Official of PHA Plans
 Consistency with the Consolidated Plan or State Consolidated Plan**

I, Gregory Dill, the Washtenaw County Administrator
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal
 year 2024 of the ANN ARBOR HOUSING COMMISSION is consistent with the
PHA Name

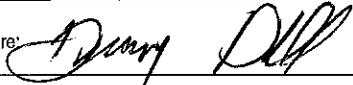
Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair
 Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

Washtenaw County
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or
 State Consolidated Plan. The AAHC has completed redevelopment of all its 17 properties with more than
 \$66 million in funding obtained from a variety of sources. In addition, AAHC contracts with several nonprofits
 to provide services to tenant who reside in project based housing. AAHC will continue the development of
 affordable housing, potentially adding to its current stock, will maintaining the quality condition of its units.

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)

Name of Authorized Official: Gregory Dill	Title: Washtenaw County Administrator
Signature: 	Date: <u>5/20/23</u>

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S.
 Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information
 are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to
 ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing
 instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD
 may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or XX Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 2024, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan 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 Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency 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), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the 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.
 11. The 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.
 12. The 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.
 13. The 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.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. With respect to public housing the 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.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

ANN ARBOR HOUSING COMMISSION

MI064

PHA Name

PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2024

5-Year PHA Plan for Fiscal Years 20__ - 20__

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).

Name of Executive Director

Jennifer Hall

Name Board Chairman

Dr. Lee Meadows

Signature

Jennifer Hall

Date 5/27/2023

Signature

Lee E Meadows

Date

5-30-2023

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

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MTW Supplement to the Annual PHA Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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Purpose. The Moving to Work (MTW) Supplement to the Annual PHA Plan informs HUD, families served by the PHA, and members of the public, about the MTW Waivers and associated activities that the MTW agency seeks to implement in the coming Fiscal Year and updates the status of MTW activities that have been previously approved. It also provides information about Safe Harbor Waivers, Agency-Specific Waivers, compliance with MTW statutory requirements, and evaluations. The MTW Supplement does not replace the PHA Plan. MTW agencies must continue to submit the applicable PHA Plan. MTW agencies that are not required to submit annual PHA Plans under the Housing and Economic Recovery Act of 2008 (HERA) must submit the MTW Supplement annually, in addition to holding public hearings, obtaining board approval, and consulting with Resident Advisory Boards (RABs) and tenant associations, as applicable, on planned MTW activities.

Applicability. Form HUD-50075-MTW is to be completed annually by all MTW agencies brought onto the MTW Demonstration Program pursuant to Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute) or legacy MTW agencies² that chose to follow the requirements of the MTW Operations Notice.

Definitions. All terms used in this MTW Supplement are consistent with the definitions stated in the MTW Operations Notice, including:

- (1) **Local, Non-Traditional Activities (LNT)** – Those MTW activities that use MTW funding flexibility outside of the Housing Choice Voucher (HCV) and public housing programs established in Sections 8 and 9 of the U.S. Housing Act of 1937.
- (2) **Safe Harbors** – The additional parameters or requirements, beyond those specified in the MTW activity description itself found in the MTW Operations Notice, following each activity description, that the MTW agency must follow in implementing MTW activities.
- (3) **Substantially the Same Requirement** – A statutory MTW requirement that MTW agencies must continue to assist substantially the same total number of eligible low-income families as would have been served absent the MTW demonstration.

A.	PHA Information.
A.1	PHA Name: _____ PHA Code: _____ MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): _____ PHA Program Type: <input type="checkbox"/> Public Housing (PH) only <input type="checkbox"/> Housing Choice Voucher (HCV) only <input type="checkbox"/> Combined MTW Cohort Number: _____ MTW Supplement Submission Type: <input type="checkbox"/> Annual Submission <input type="checkbox"/> Amended Annual Submission
B.	Narrative.
B.1	MTW Supplement Narrative. The narrative provides the MTW agency with an opportunity to explain to the public, including the families that it serves, its MTW plans for the fiscal year and its short and long-term goals. The MTW agency should provide a description of how it seeks to further the three MTW statutory objectives during the coming Fiscal Year. Those three MTW statutory objectives are: (1) to reduce cost and achieve greater cost effectiveness in federal expenditures; (2) to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and (3) to increase housing choices for low-income families.

² Legacy MTW Agencies are agencies that were designated as MTW as of December 15, 2015

C.	MTW Waivers and Associated Activities.
	NOTE: MTW agencies are reminded that all MTW Waivers and associated activities must be implemented in accordance with the MTW Operations Notice and within its safe harbors unless a Safe Harbor or Agency-Specific Waiver approval is provided by HUD, in which case, the activity utilizing the Safe Harbor or Agency-Specific Waiver must be implemented in accordance with the terms of the approval.
Screener	<p>For all MTW Waivers and Activities in Section C, the screening question listed below will be presented in the fillable form. This will allow the form to only display those waivers that input where is required.</p> <p>Each waiver and activity will be listed with the following choices. If “Not Currently Implemented” is selected, the agency will not be shown any further questions for the activity.</p> <ul style="list-style-type: none"> • Currently Implementing • Plan to Implement in the Submission Year • Will be Discontinued in the Submission Year • Was Discontinued in a previous Submission Year • Not Currently Implemented
Core Questions	The following core questions apply to all of the MTW Waivers and associated activities listed in the MTW Operations Notice. The core questions collect basic information about any MTW activity proposed or implemented by MTW agencies.

Text	Input options and instructions
Narrative. 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.	Text box [Note: If an MTW agency has the same MTW activity in both its public housing and HCV programs, it receives instructions to just write one narrative explaining that it covers both programs.]
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) <input type="checkbox"/> Cost effectiveness <input type="checkbox"/> Self-sufficiency <input type="checkbox"/> Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	(Check at least one) <input type="checkbox"/> Neutral (no cost implications) <input type="checkbox"/> Increased revenue <input type="checkbox"/> Decreased revenue <input type="checkbox"/> Increased expenditures <input type="checkbox"/> Decreased expenditures
Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	<input type="checkbox"/> The MTW activity applies to all assisted households <input type="checkbox"/> The MTW activity applies only to a subset or subsets of assisted households <i>If the agency selects “The MTW activity applies only to a subset or subsets of assisted households” then the agency will receive the following three questions:</i>
Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	(Check one) <input type="checkbox"/> New admissions (i.e., applicants) only <input type="checkbox"/> Currently assisted households only <input type="checkbox"/> New admissions and currently assisted households

Text	Input options and instructions
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p><input type="checkbox"/> The MTW activity applies to all family types <input type="checkbox"/> The MTW activity applies only to selected family types <i>If the agency selects “The MTW activity applies to all family types” it does not get any further questions about family types. If the agency selects “The MTW activity applies only to selected family types” it is presented the following question and options:</i></p> <p>Please select the family types subject to this MTW activity: <input type="checkbox"/> Non-elderly, non-disabled families <input type="checkbox"/> Elderly families <input type="checkbox"/> Disabled families (to the extent those families are not exempt via a reasonable accommodation) <input type="checkbox"/> Other – another specifically defined target population or populations. Please describe this target population in the text box.</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For PH activities: <input type="checkbox"/> The MTW activity applies to all developments <input type="checkbox"/> The MTW activity applies to specific developments <i>If the agency selects “The MTW activity applies to specific developments” then it is presented the follow up question:</i></p> <p>Which developments participate in the MTW activity? [agencies choose the applicable development number(s) from a list of their public housing developments]</p> <p>For HCV activities: <input type="checkbox"/> The MTW activity applies to all tenant-based units <input type="checkbox"/> The MTW activity applies to all properties with project-based vouchers <input type="checkbox"/> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers <i>If the agency selects “The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers” then it is presented the follow up question:</i></p> <p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>Yes/No [If Yes]: What is the status of the Safe Harbor Waiver request? <input type="checkbox"/> The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D). <input type="checkbox"/> The waiver was previously approved. [If checked]: Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency’s goal in implementing this MTW activity.</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>Yes/No/Already provided [If Yes]: Upload Hardship Policy [If No, skip below Hardship Policy questions] [If Already provided, the agency has already provided the Hardship Policy under another activity and indicated that the policy is also applicable to this activity.]</p>
<p>Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p>	<p>Yes/No [If yes, a list will be presented to select the applicable MTW activities]</p>

Text	Input options and instructions
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?	Yes/No [If Yes, then a further question pops up.]: What considerations led the MTW agency to modify the hardship policy?
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?	<input type="text"/> [Numerical entry only] [if number > 0, further questions pop up]: <input type="text"/> How many hardship requests were approved? [Numerical entry only] <input type="text"/> How many hardship requests were denied? [Numerical entry only] <input type="text"/> How many are pending? [numerical entry only]
Does the MTW activity require an impact analysis?	Yes/No/Already provided [If Yes]: Upload Impact Analysis [If No, skip the below Impact Analysis questions] [If Already provided, the agency has already provided the impact analysis under another activity and indicated that the policy is also applicable to this activity.]
Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)	Yes/No [If yes, a list will be presented to select the applicable MTW activities]
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.	
Please provide an explanation as to why the activity was discontinued or will be discontinued.	[Will only apply if “Will be Discontinued in the Submission Year” or “Was Discontinued in a previous Submission Year” is selected in the screener.] [Text box]

Custom Questions	Custom questions are tailored to each MTW activity. In what follows, the MTW activities are listed with their custom questions. The final online version of the MTW Supplement will be set up so that if an MTW activity is the same in the HCV and/or public housing programs, the MTW agency fills in the information for public housing, then the information is auto populated for the HCV program. MTW agencies are asked to fill in answers only to questions that are relevant to the MTW activities they propose to implement or are already implementing.
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C.1	Tenant Rent Policies
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1.a., 1.b. - Tiered Rent (PH & HCV)	Input options and instructions
Please describe how the income bands are structured.	
Please upload the tiered rent policy table that shows the income bands.	[Upload document]
What is the income basis for assigning households to income bands?	<input type="checkbox"/> This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs) <input type="checkbox"/> This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) <input type="checkbox"/> 1.r. and/or 1.s. “elimination of deductions” <input type="checkbox"/> 1.t. and/or 1.u. “standard deductions” <input type="checkbox"/> 1.v. and/or 1.w “alternative inclusions and exclusions”

1.c., 1.d. - Stepped Rent (PH & HCV)	Input options and instructions
Describe how the stepped rent is structured, including the following: how each household’s rent will be set in the first year; how frequently rents will change and by what amount; and how the stepped rent will end (i.e., what is the maximum rent). Please	Description Stepped rent schedule [Upload document]

1.c., 1.d. - Stepped Rent (PH & HCV)		Input options and instructions
upload a document that presents the stepped rent schedule in the form of a table.		
If a household progresses all the way through the stepped rent schedule, what will their status be?		<input type="checkbox"/> They will no longer receive a subsidy <input type="checkbox"/> They will continue to receive a shallow subsidy <input type="checkbox"/> Other\Not Applicable. [If checked]: Please explain
1.e., 1.f. - Minimum Rent (PH & HCV)		Input options and instructions
How much is the minimum rent or minimum Total Tenant Payment (TTP)?		\$ _____ [Note: If the MTW agency indicates they have a minimum rent that applies only to particular subgroups, as determined by responses to core questions, the question gets asked for each subgroup.]
1.g., 1.h. - Tenant Payment as a Modified Percentage of Income (PH & HCV)		Input options and instructions
What percentage of income will equal the Total Tenant Payment (TTP)?		_____ %
What is the income basis for calculating Total Tenant Payment?		<input type="checkbox"/> This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs) <input type="checkbox"/> This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) <input type="checkbox"/> 1.r. and/or 1.s. "elimination of deductions" <input type="checkbox"/> 1.t. and/or 1.u. "standard deductions" <input type="checkbox"/> 1.v. and/or 1.w. "alternative inclusions and exclusions"
1.i., 1.j. - Alternative Utility Allowance (PH & HCV)		Input options and instructions
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.		
1.k., 1.l. - Fixed Rents/Subsidy (PH & HCV)		Input options and instructions
Describe the method used to establish the fixed rents.		
How many households are currently subject to this policy?		

Table 1.k.1, 1.l.1 - What is the fixed rent/subsidy for each of the following unit sizes?

Unit Size	Rent Amount – PH	Subsidy Amount – HCV
Studio/Efficiency	\$ _____	\$ _____
One-bedroom	\$ _____	\$ _____
Two-bedroom	\$ _____	\$ _____
Three-bedroom	\$ _____	\$ _____
Four or more bedrooms	\$ _____	\$ _____

1.m., 1.n. - Utility Reimbursements (PH & HCV)		[No custom questions for this activity.]
1.o. - Initial Rent Burden (HCV)		Input options and instructions
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?		_____ %
1.p., 1.q. - Imputed Income (PH & HCV)		Input options and instructions
Does the imputed income policy assume a set number of hours worked per individual or per household?		(Check one) <input type="checkbox"/> Per individual <input type="checkbox"/> Per household
How many hours per week are assumed?		[Number entries between 0 and 15 or 0 and 30, as appropriate, allowed]
What is the assumed wage rate?		[Must be a number less than or equal to the federal minimum wage]

1.p., 1.q. - Imputed Income (PH & HCV)		Input options and instructions
How many households are currently subject to this policy?		_____ [number]
1.r., 1.s. - Elimination of Deduction(s) (PH & HCV)		Input options and instructions
Which deduction(s) will be eliminated, modified, or added?		(Check all that apply) <input type="checkbox"/> Dependent allowance <input type="checkbox"/> Unreimbursed childcare costs <input type="checkbox"/> Other (please explain)
1.t., 1.u. - Standard Deductions (PH & HCV)		Input options and instructions
How much will the single standard deduction be in the Fiscal Year?		\$_____
1.v., 1.w. - Alternative Income Inclusions/Exclusions (PH & HCV)		Input options and instructions
What inclusions or exclusions will be eliminated, modified, or added?		
C.2	Payment Standards and Rent Reasonableness	
2.a. - Payment Standards – Small Area Fair Market Rents (FMR) (HCV)		Input options and instructions
Please explain the payment standards by ZIP code or “grouped” ZIP codes.		
2.b. - Payment Standards – Fair Market Rents (HCV)		Input options and instructions
Please explain the payment standards by FMR.		
2.c. - Rent Reasonableness – Process (HCV)		
Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method.		
2.d. - Rent Reasonableness – Third-Party Requirement (HCV)		Input options and instructions
Please explain or upload a description of the quality assurance method.		[Upload file] options
Please explain or upload a description of the rent reasonableness determination method.		[Upload file] options
C.3	Reexaminations	
3.a., 3.b. - Alternative Reexamination Schedule for Households (PH & HCV)		Input options and instructions
What is the recertification schedule?		(Check one) <input type="checkbox"/> Once every two years <input type="checkbox"/> Once every three years <input type="checkbox"/> Other [If checked]: Please describe. [Text box]
How many interim recertifications per year may a household request?		___ 0 ___ 1 ___ 2 or more
Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.		
3.c., 3.d. - Self-Certification of Assets (PH & HCV)		Input options and instructions
Please state the dollar threshold for the self-certification of assets.		\$_____

C.4	Landlord Leasing Incentives
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4.a., 4.b., 4.c. - Vacancy Loss, Damage Claims, and Other Landlord Incentives (HCV)	Input options and instructions (The same custom questions are asked for each of these activities.)
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)?	<input type="checkbox"/> To all units [No follow-up questions] <input type="checkbox"/> Certain types of units only [if checked, there are follow up questions]: What types of units does this policy apply to? <input type="checkbox"/> Accessible units <input type="checkbox"/> Units in particular types of areas or neighborhoods [if checked]: Please describe these areas briefly: [Text box] <input type="checkbox"/> Units/landlords new to the HCV program <input type="checkbox"/> Other [if checked]: Please describe briefly [Text box]
What is the maximum payment that can be made to a landlord under this policy?	
How many payments were issued under this policy in the most recently completed PHA fiscal year?	___ [number of payments]
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	\$_____

C.5	Housing Quality Standards (HQS)
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5.a. - Pre-Qualifying Unit Inspections (HCV)	Input options and instructions
How long is the pre-inspection valid for?	___ [number of days]
5.b. - Reasonable Penalty Payments for Landlords (HCV)	Input options and instructions
What is the maximum penalty payment that can be made to a landlord under this policy?	
How many penalty payments were charged under this policy in the most recently completed PHA fiscal year?	_____ [number]
5.c. - Third-Party Requirement (HCV)	Input options and instructions
Please explain or upload a description of the quality assurance method.	[Upload file] options
5.d. - Alternative Inspection Schedule (HCV)	Input options and instructions
	[No custom questions for this activity.]

C.6	Short-Term Assistance
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6.a., 6.b. - Short-Term Assistance (PH & HCV)	Input options and instructions
What is the term of assistance?	___ [number of months]
How is the tenant contribution established for this program?	
How many households do you expect to serve in this program in the Fiscal Year?	___ [Numerical entry only allowed]
How do you fulfill the obligation to offer participants in this program the opportunity to transition to the HCV or public housing (as applicable) program subject to availability?	
Please list any partner organizations and briefly note the services that each provides.	

C.7	Term-Limited Assistance
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7.a., 7.b. - Term-Limited Assistance (PH & HCV)	Input options and instructions
Does the term-limited assistance MTW activity exempt any type of household or individual other than the elderly or individuals with disabilities	Yes/No [If Yes]: Please describe the conditions for exemption. [text box]
Please describe how the MTW agency supports households to prepare for the end of assistance.	[Text box]
How many households are currently subject to this policy?	_____ [number]

C.8	Increase Elderly Age
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8. - Increase Elderly Age (PH & HCV)	Input options and instructions
What is the new definition of elderly?	___ years old [Numerical entry allowed between 62 - 65]

C.9	Project-Based Voucher Program Flexibilities (PBV)
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9.a. - Increase PBV Program Cap (HCV)	Input options and instructions
What percentage of total authorized HCV units will be authorized for project-basing?	_____ %
9.b. - Increase PBV Project Cap (HCV)	[No custom questions for this activity.]
9.c. - Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement (HCV)	[No custom questions for this activity.]
9.d. - Alternative PBV Selection Process (HCV)	[No custom questions for this activity.]
9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Input options and instructions
How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?	___ Units
How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?	___ Units
How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?	___ Units
How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?	___ Units
9.f. - Increase PBV Housing Assistance Payment (HAP) Contract Length (HCV)	[No custom questions for this activity.]
9.g. - Increase PBV Rent to Owner (HCV)	[No custom questions for this activity.]
9.h. - Limit Portability for PBV Units (HCV)	[No custom questions for this activity.]

C.10	Family Self-Sufficiency Program with MTW Flexibility (Traditional)
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10.a. - Waive Operating a Required FSS Program (PH & HCV)	[No custom questions for this activity.]
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10.b. - Alternative Structure for Establishing Program Coordinating Committee (PH & HCV)	Input options and instructions
Please describe the alternative structure and how it is designed to secure local resources to support an MTW Self-Sufficiency program.	[Text box]

10.c. - Alternative Family Selection Procedures (PH & HCV)	Input options and instructions
Please describe the purpose and goals of the alternative contract or locally developed agreement, and/or the MTW agency’s motivation for developing its own contract or agreement.	[Text box]

10.d. - Modify or Eliminate the Contract of Participation (PH & HCV)	[No custom questions for this activity.]
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10.e. - Policies for Addressing Increases in Family Income (PH & HCV)	Input options and instructions
How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?	

C.11	MTW Self-Sufficiency Program
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11.a. - Alternative Family Selection Procedures (PH & HCV)	Input options and instructions
Will the MTW agency’s MTW Self-Sufficiency policy make the program mandatory for anyone?	Yes/No [If Yes]: Please describe the population group for whom participation in the MTW Self-Sufficiency program is mandatory.

11.b. - Policies for Addressing Increases in Family Income (PH & HCV)	Input options and instructions
What is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program?	

C.12	Work Requirement
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12.a., 12.b. – Work Requirement (PH & HCV)	Input options and instructions
Does the work requirement MTW activity exempt any type of household or individual other than those required to be excluded through the MTW Operations Notice or those excluded as a reasonable accommodation?	Yes/No [If Yes]: Please describe the conditions for exemption.
What counts as “work” under this the work requirement MTW activity?	
How will the MTW agency monitor compliance with the work requirement MTW activity?	
What supportive services are offered to support households to comply with the work requirement?	
How does the agency address noncompliance with the work requirement policy?	
How many households are currently subject to the policy?	_____ [number]
How many households in the most recently completed PHA fiscal year were sanctioned for non-compliance with the work requirement?	_____ [number]

C.13	Public Housing as an Incentive for Economic Progress
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13. - Public Housing as an Incentive for Economic Progress (PH)	Input options and instructions
How many months will households be able to remain in a unit while over income?	_____ [number]

C.14	Moving On Policy
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14.a. - Waive Initial HQS Inspection Requirement (HCV)	[No custom questions for this activity.]
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14.b. - Allow Income Calculations from Partner Agencies (PH and HCV)	[No custom questions for this activity.]
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14.c. - Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH & HCV)	[No custom questions for this activity.]
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C.15	Acquisition without Prior HUD Approval
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15. - Acquisition without Prior HUD Approval (PH)	[No custom questions for this activity.]
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C.16	Deconcentration of Poverty in Public Housing Policy
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16. - Deconcentration of Poverty in Public Housing (PH)	[No custom questions for this activity.]
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C.17	Local, Non-Traditional (LNT) Activities
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17.a. - Rental Subsidy Programs	Input options and instructions
Does the MTW activity apply to all LNT units/properties?	<input type="checkbox"/> The MTW activity applies to all units/properties <input type="checkbox"/> The MTW activity applies to specific units/properties <i>If the agency selects "The MTW activity applies to specific LNT units/properties" then it is presented the follow up question:</i> Describe which LNT units/properties participate in the MTW activity?

Table 17.a.1 - For each third-party partner, please complete the information in the following table.

Third-party Partner	Type of Services the Partner Provides	# of Units Allocated to that Partner for the Fiscal Year

17.b. - Service Provision	Input options and instructions
What types of services is the MTW agency providing?	
How many households did the PHA provide services to in the most recently completed PHA Fiscal Year through this activity?	_____ [number]

17.b. - Service Provision	Input options and instructions
Does the MTW activity apply to all LNT units/properties?	<input type="checkbox"/> The MTW activity applies to all units/properties <input type="checkbox"/> The MTW activity applies to specific units/properties <i>If the agency selects "The MTW activity applies to specific LNT units/properties" then it is presented the follow up question:</i> Describe which LNT units/properties participate in the MTW activity? [Text box]
Are any families receiving services only (i.e., services only and no housing assistance provided by the PHA)?	Yes/No [If yes, answer question below.] <input type="checkbox"/> # of persons receiving LNT services only in the most recently completed PHA fiscal year.

17.c. - Housing Development Programs

For each LNT housing development that the MTW agency will commit funds to or spend funds on in this Fiscal Year, in Table 17.c.1 below please add the name of the development to one column heading and then provide the requested information, including the MTW agency role (Acquisition, Rehabilitation, or New Construction), the type of MTW agency financing (Gap Financing, Tax Credit Partnership, Other), and the total number of affordable units in the development. If possible, please provide a breakdown of the number of affordable units by level of affordability.

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

Question	[add name of development and address]	[add name of development and address]	[add name of development and address]	[add name of development and address]
MTW Role: Acquisition, Rehabilitation, New Construction?				
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
<ul style="list-style-type: none"> • 80% of AMI 				
<ul style="list-style-type: none"> • 60% of AMI 				
<ul style="list-style-type: none"> • 30% of AMI 				
<ul style="list-style-type: none"> • Other 				

Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year [autofill upcoming year]

Question	[add name of development and address]	[add name of development and address]	[add name of development and address]	[add name of development and address]
MTW Role: Acquisition, Rehabilitation, New Construction?				
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
• 80% of AMI				
• 60% of AMI				
• 30% of AMI				
• Other				

For each LNT housing development that the MTW agency committed funds to or spent funds on in the most recently completed Fiscal Year, please add the name of the development to one column in Table 17.c.2 below heading and then provide the requested information, including the MTW agency role (Acquisition, Rehabilitation, or New Construction), the type of MTW agency financing (Gap Financing, Tax Credit Partnership, Other), and the total number of affordable units in the development. If possible, please provide a breakdown of the number of affordable units by level of affordability.

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

Question	[add name of development and address]	[add name of development and address]	[add name of development and address]	[add name of development and address]
MTW Role: Acquisition, Rehabilitation, New Construction?				
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
• 80% of AMI				
• 60% of AMI				
• 30% of AMI				
• Other				

Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year [autofill previous year]

Question	[add name of development and address]	[add name of development and address]	[add name of development and address]	[add name of development and address]
MTW Role: Acquisition, Rehabilitation, New Construction?				
Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other				
Number of Affordable Units				
Total Number of Units				
Number of Units by Affordability				
<ul style="list-style-type: none"> 80% of AMI 				
<ul style="list-style-type: none"> 60% of AMI 				
<ul style="list-style-type: none"> 30% of AMI 				
<ul style="list-style-type: none"> Other 				

D.	Safe Harbor Waivers.
D.1	<p>Safe Harbor Waivers seeking HUD Approval: The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be provided: (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor, (b) the specific safe harbor and its implementing regulation, (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver, (d) a description of the local issue and why such an expansion is needed to implement the MTW activity, (e) an impact analysis, (f) a description of the hardship policy for the MTW activity, if applicable, and (g) 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 request for approval of a Safe Harbor Waiver this year?</p> <p><input checked="" type="checkbox"/> No <input type="checkbox"/> Yes [If yes, upload required information in a-g above for each Safe Harbor Waiver request]</p>
E.	Agency-Specific Waivers.
E.1	<p>Agency-Specific Waivers for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, 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</p>

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.

Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?

No [If no, skip to E.2]
 Yes [If yes, please provide a title and upload required information in a-h above for each Agency-Specific Waiver request]

E.2 Agency-Specific Waiver(s) for which HUD Approval has been Received:
 For each previously approved Agency-Specific Waiver(s), a set of questions will populate.

Does the MTW agency have any approved Agency-Specific Waivers?

Yes [If yes, then the following questions will pop up for each Agency-Specific Waiver approved in Section E.1 in a previous submission; the titles will be prepopulated]
 [Yes/No/Discontinued] Has there been a change in how the waiver is being implemented from when it was originally approved?
 [If Yes]: If there has been a change, please provide a description of what has changed.
 [If Discontinued]: 1) If this waiver has been discontinued, please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA. 2) If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation.

No [If no, question set concludes]

F. Public Housing Operating Subsidy Grant Reporting.

F.1 Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$	\$	\$	9/30/2029
2022	\$	\$	\$	9/30/2030
2023	\$	\$	\$	9/30/2031

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	# 1
49%-30% Area Median Income	# 8
Below 30% Area Median Income	# 112
Total Local, Non-Traditional Households	# 121

*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.
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Question	Input options and instructions
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?	Yes/No [If Yes]: please describe the MTW agency’s plans for its future rent reform activity and the implementation time line.

G.3	Substantially the Same (STS) – Local, Non-Traditional.
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Questions	Input options and instructions
Please provide 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
Please provide 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
How many units, developed under the local, non-traditional housing development activity, were available for occupancy during the prior full calendar year (by bedroom size)?	Please include only those units that serve households at or below 80% of AMI in the table provided.

PROPERTY NAME/ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	# 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?
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Totals	#	#	#	#	#	#	#		#	#		

* User will select one of the following from the “Population Type” dropdown box: General, Elderly, Disabled, Elderly/Disabled, Other

If the “Population Type” of is Other is selected, please state the Property Name/Address and describe the population type. [Text box]

** The federal accessibility standard under HUD’s Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance. HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD’s Notice on “Instructions for use of alternative accessibility standard,” published in the Federal Register on May 23, 2014 (“Deeming Notice”) for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>. This would also include adaptable units as defined by HUD’s Section 504 regulation (See 24 CFR § 8.3 and § 8.22).

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
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In order to demonstrate that the MTW statutory requirement of “maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration” is being achieved, the MTW agency will provide information for its most recently completed Fiscal Year in the following table.

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

Family Size:		Occupied Number of Local, Non-Traditional units by Household Size
1 Person	494	#
2 Person	228	#
3 Person	234	#
4 Person	248	#
5 Person	120	#
6+ Person	120	#
Totals		#

G.5	Housing Quality Standards.
	Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program. The public housing program is monitored through physical inspections performed by the Real Estate Assessment Center (REAC).

H.	Public Comments.
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H.1	Input options and instructions
Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.	Upload Attachment MTW RAB MEETING 11.9.22
Please attach a narrative describing the MTW agency’s analysis of the comments and any decisions made based on these comments.	Upload Attachment AGENCY ANALYSIS OF MTW RAB 11.9.22
If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	X Yes ___ No ___ N/A
If yes, please attach the comments received along with the MTW agency’s description of how comments were considered.	Upload Attachment AGENCY ANALYSIS OF MTW 1.2023

I	Evaluations.
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I.1	Please list any ongoing and completed evaluations of the MTW agency’s MTW policies, that the PHA is aware of, including the information requested in the table below. In the box “title and short description,” please write the title of the evaluation and a brief description of the focus of the evaluation. N/A
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Question	Input options and instructions
Does the PHA have an agency-sponsored evaluation? N/A	Yes/No [If Yes]: Please complete the table below.

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available
N/A			

J	MTW Certifications of Compliance.
J.1	The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD. Certification is provided below.

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2023), 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 identity, 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.

ANN ARBOR HOUSING COMMISSION

MI064

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).

Dr. Lee Meadows

BOARD PRESIDENT

NAME OF AUTHORIZED OFFICIAL

TITLE

Lee J Meadows

3-22-2023

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.**

PHA Name : Ann Arbor Housing Commission

PHA Code : MI064

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2023

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Ann Arbor Housing Commission is deeply committed to providing excellent housing opportunities to current and future residents of Washtenaw and Monroe Counties. Within our jurisdiction exists immensely diverse communities, ranging from the dense urban centers of Ann Arbor and Ypsilanti, to the more sparsely populated townships of Superior and Scio. Many of these neighborhoods are complimented by strong school systems, low poverty rates, and desirable housing, while other neighborhoods are challenged by limited public services and diminishing economic opportunity.

As a Moving To Work agency, we hope to increase housing choice in some of our highest opportunity and more economically exclusive communities. It is our belief that the MTW program will aid in our efforts to increase housing stability for our most vulnerable community members and allow us to establish long-term relationships with private sector housing providers. As AAHC continues to take major steps towards developing new affordable housing, our MTW activities will serve as an additional tool to provide more desirable housing for those most in need.

Cost Effectiveness:

AAHC is eager to employ the funding and programmatic flexibility that MTW provides in order to more efficiently utilize its federally allocated funds. Our administrative processes, supportive services, and development projects will all benefit from MTW allowances and activities. The AAHC is actively partnering with local nonprofits, public agencies and local governments to increase the supply of affordable housing in the City of Ann Arbor, Washtenaw County, and Monroe County through financial tools, development of affordable housing on public property, project-based vouchers, zoning regulations and other public policy tools. AAHC plans to use MTW flexibilities to fund the programs and projects that it determines will be of the greatest benefit to our communities and incentivize potential partners to assist in our goal of increasing housing opportunity. Additionally, specific waivers such as those related to HQS inspections offers AAHC the opportunity to cut down on unnecessary staff time and rededicate itself to tasks that are of more immediate importance.

Self-Sufficiency:

AAHC partners with many local non-profits, mainstream service providers, and the private sector to build healthy residential communities and promote an atmosphere of pride and responsibility. The AAHC has contracts with 7 non-profit agencies to provide on-site support service to tenants who live in AAHC properties. The AAHC has a contract with SOS Community Services to provide eviction prevention services to all the AAHC's voucher tenants. A recent internal analysis of supportive services offered at AAHC properties indicated their tremendous effectiveness at preventing eviction and providing housing stability; outcomes among formerly homeless households were especially encouraging as compared to national trends. The AAHC has MOUs with many local agencies to assist homeless and disabled applicants complete the application process, search for housing, and successfully lease-up. The AAHC also works directly with the Michigan Works! agency to leverage employment and training opportunities for program participants. Additionally, AAHC works with private companies, local non-profits, and Habitat for Humanity to increase participation in the AAHC's Homeownership Program. The AAHC partners with the United Way to provide support services aimed at empowering families to build savings and financial capabilities as a pathway out of poverty. The AAHC also participates in HUD's Family Self Sufficiency Program. As an MTW agency, AAHC has the opportunity to divert funding to many of the aforementioned programs and partnerships. AAHC will continually analyze the effectiveness and financial state of these programs in order to determine how to best allocate funding to each of them.

Increasing Housing Choice:

According to the Martin Prosperity Institute's 2015 report "Segregated City, The Geography of Economic Segregation in America", Washtenaw County is the 8th most income segregated County in the United States. Low-Income residents in Washtenaw County have limited opportunities for mobility due to the high housing costs throughout the county, especially in high opportunity areas. The MTW designation can help the AAHC provide more numerous and more desirable choices through higher payment standards and landlord incentives to expand our pool of participating landlords. HUD has recognized a growing number of populations with specific needs that often go unmet by the existing housing infrastructure. AAHC's goal is to develop programs and housing stock targeted to the most underserved populations. In pursuit of this goal, we currently administer several special purpose voucher programs in addition to the Housing Choice Voucher and Project Based Voucher programs.

AAHC recognizes the significant and immediate need for additional affordable housing. A recent market analysis for the City of Ann Arbor shows a market demand for 1,300 units at 30% AMI, 700 units at 31% to 60% AMI and 300 units at 61% to 100% AMI just in the downtown area. AAHC is looking to increase the housing opportunities through partnerships, private/non-profit development, acquisition, and utilizing programs such as MTW. The Corporation for Supportive Housing (CSH) recently completed a needs analysis for Permanent Supportive Housing for all of Washtenaw County and determined that in the next 10 years an additional 1,581 PSH units for single adults and 407 PSH units for families are needed. The AAHC currently has a homeless preference for its waitlist and partners with the Continuum of Care and multiple non-profits to house homeless households in AAHC PBV units as well as with tenant-based vouchers. The AAHC and its community partners work hard to create programs and opportunities for homeless households to live in low-poverty, high opportunity neighborhoods.

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	
2. Payment Standards and Rent Reasonableness	
3. Reexaminations	
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
5. Housing Quality Standards (HQS)	
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
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 Ann Arbor Housing Commission Plans to Implement in the Submission Year or Is Currently Implementing

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)
<p>Activity: For eligible participants of the Landlord Incentive Demonstration AAHC will offer vacancy loss payment to participating landlords for assisted units. Landlords will receive an additional payment equal to one-month contract rent for re-leasing a unit to a voucher holder after a previous voucher holder has vacated the unit. The unit must be previously occupied and re-leased by an HCV assisted family. Payments will be made to landlords when the next HAP contract is executed between the owner and the AAHC.</p> <p>Goal: The goal of this activity is to increase the number of participating owners, expanding housing opportunities for participants, and deconcentrating poverty.</p> <p>Initiative: AAHC will implement initiatives that seek to incentivize landlords to participate in the HCV program. This activity, combined with triennial inspections, HAP direct deposits, rapid initial HQS inspections, damage loss payments, and bonus payment are intended to increase and retain landlord participation.</p>
This MTW activity serves the following statutory objectives:
Housing choice
This MTW activity has the following cost implications:
Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

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.

This is the first fiscal year as an MTW agency. This activity will be implemented for the first time during the submission year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This policy applies to

To all units

The types of units policy applies to:

Maximum payment to the landlord is

\$Payments are not to exceed 1 month of contract rent on the unit..

0 payments were issued under this policy y in the most recently completed PHA fiscal year.

\$0 issued under this policy in the most recently completed PHA fiscal year.

4.b. - Damage Claims (HCV-Tenant-based Assistance)

Activity:

Eligible households and their respective landlords will participate in the Landlord Incentive Demonstration. In addition to AAHC making additional payment to landlords that re-lease a unit to a voucher holder, AAHC will compensate current landlords for damage claims as an incentive for continued participation in the HCV program.

To incentivize a landlord's continued participation in the HCV program, AAHC will provide compensation to landlords when the tenant leaves the unit damaged. Landlords will receive compensation for damage claimed not to exceed the lower of the cost of repairs or two months of contract rent. The household's security deposit must first be used to cover damages and the agency may provide up to two months of contract rent minus the security deposit to cover remaining repairs. Payments will be made to landlords when the next HAP contract is executed between the owner and the AAHC.

Goal:

The goal of this activity is to increase the number of participating owners, expand housing opportunities for participants, and retain landlords' participation in the HCV program.

Initiative:

AAHC will implement initiatives that seek to incentivize landlords to participate in the HCV program. This activity combined with triennial inspections, HAP direct deposits, rapid initial HQS inspections, and bonus payments are intended to increase and retain landlord participation.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

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.

This is the first fiscal year as an MTW agency. This activity will be implemented for the first time during the submission year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This policy applies to

To all units

The types of units policy applies to:

Maximum payment to the landlord is

\$Damage loss payments will not exceed the lower of:

The cost of repairs

Two months of contract rent

(Landlords must first use the household security deposit to cover any damages).

0 payments were issued under this policy y in the most recently completed PHA fiscal year.

\$0 issued under this policy in the most recently completed PHA fiscal year.

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)

Activity:

Eligible households will participate in the Landlord Incentive Demonstration. AAHC will make additional payment to landlords who re-lease units to participating families and compensate landlords for damage claims as an incentive for continued participation in the HCV program. AAHC will make payment to the landlord for security deposit, application fees, and holding fees on behalf of the assisted family. Payments for security deposit and rental insurance must not exceed one month's rent, in total. Households may request assistance for application fees and holding fees for no more than five units for each voucher issued.

Goal: The goal of this activity is to increase the number of participating owners, expand housing opportunities for participants, and retain landlord's participation in the HCV program.

Initiative:

AAHC will implement initiatives to encourage landlords to participate in the HCV program. AAHC will implement initiatives that seek to give incentives to landlords to participate in the HCV program. This activity combined with triennial inspections, HAP direct deposits, rapid initial HQS inspections, damage loss payments, and bonus payment are intended to increase and retain landlord participation.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

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.

This is the first fiscal year as an MTW agency. AAHC will implement this activity for the first time during the submission year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This policy applies to To all units (Display selected and additional Pop up is complex logic.)

The types of units policy applies to:

Maximum payment to the landlord is

\$Payments under this activity are not to exceed 1 month of contract rent on the applicable unit. Payments for security deposits and rental insurance must not exceed 1 month of contract rent, in total..

0 payments were issued under this policy y in the most recently completed PHA fiscal year.

\$0 issued under this policy in the most recently completed PHA fiscal year.

5.d. - Alternative Inspection Schedule (HCV)

Activity:

Through the combined MTW activities 4.a. Vacancy Loss Payment, 4.b. Damage Loss Payments, and 4.c. Other Landlord incentives AAHC will implement activities that encourage owner participation in the HCV program. AAHC will inspect assisted units of eligible households once every three years for landlords who are participating in the Landlord Incentive Demonstration. Eligible households and participating landlords may request interim (special/compliant) inspection at any time during the term of the HAP contract. AAHC will comply with HQS inspection standards as found at

24 CFR 982.401. AAHC will inspect assisted units at any time for health and safety, as well as accessibility purposes.

Goal:

The goal of this activity is to increase the number of participating owners, expand housing opportunities for participants, and retain landlord's participation in the HCV program.

Initiative:

AAHC will implement initiatives to incentivize landlords to participate in the HCV program. AAHC will implement initiatives that seek to incentivize landlords to participate in the HCV program. This activity combined with HAP direct deposits, rapid initial HQS inspections, damage loss payments, and vacancy payments are intended to increase and retain landlord participation.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

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.

This is the first fiscal year as an MTW agency. AAHC will implement this activity for the first time during the submission year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: No Safe Harbor Waivers are being requested.

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

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	1
	49%-30% Area Median Income	8
	Below 30% Area Median Income	112
	Total Local, Non-Traditional Households	121

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

G.2	Establishing Reasonable Rent Policy.
MTW agency did not established a rent reform policy to encourage employment and self-sufficiency AAHC will review the options available and select one of the MTW Activities.	

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.	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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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.	

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	494
2 Person	228
3 Person	234
4 Person	248
5 Person	120
6+ Person	120
Totals	1,444

H.	Public Comment
	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.

I.	Evaluations.
	No known evaluations.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency: See Hardship Policy

Received 0 hardship requests

Approved 0 hardship requests

Denied 0 hardship requests

There is\are 0 hardship requests pending.

Safe Harbor Waivers.

Safe Harbor Waivers seeking HUD Approval:

None

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

None

What is the status of the Safe Harbor Waiver request?

None

Agency-Specific Waiver(s).

Agency-Specific Waiver(s) for HUD Approval:

The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.

None

Agency-Specific Waiver(s) for which HUD Approval has been Received:

None

Impact Analysis:

See Attached

4.a. – Vacancy Loss (HCV)	
This MTW activity serves the following statutory objectives:	
Housing choice	
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>Activity: For eligible participants of the Landlord Incentive Demonstration AAHC will offer vacancy loss payment to participating landlords for assisted units. Landlords will receive an additional payment equal to one-month contract rent for re-leasing a unit to a voucher holder after a previous voucher holder has vacated the unit. The unit must be previously occupied and re-leased by an HCV assisted family. Payments will be made to landlords when the next HAP contract is executed between the owner and the AAHC.</p> <p>Goal: The goal of this activity is the increase the number of participating owners, expanding housing opportunities for participants, and deconcentrating poverty.</p> <p>Initiative: AAHC will implement initiatives that seek to incentivize landlords to participate in the HCV program. This activity, combined with triennial inspections, HAP direct deposits, rapid initial HQS inspections, damage loss payments, and bonus payment are intended to increase and retain landlord participation.</p>	
This MTW activity has the following cost implications:	
Decreased expenditures	
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.	
The MTW activity applies to all assisted households: new admissions and current assisted.	
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.	
This is the agency first fiscal year. AAHC will implement this activity in the submission year.	
No hardship were requested in the most recent fiscal year.	
In the prior year, under this activity, Ann Arbor Housing Commission MTW agency	
Received 0 hardship requests	
Approved hardship requests	
Denied hardship requests	
There is\are hardship requests pending.	
	Safe Harbor Waivers.
	Safe Harbor Waivers seeking HUD Approval:
	None
	Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

	None
	<p>What is the status of the Safe Harbor Waiver request?</p> <p>None</p>
	Agency-Specific Waiver(s).
	<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, Agency-Specific Waivers may be requested.</p> <p>Not requested</p>
	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Not applicable</p>

4.b. – Damage Claims (HCV)

This MTW activity serves the following statutory objectives:

Housing choice

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.

Activity:

Eligible households and their respective landlords will participate in the Landlord Incentive Demonstration. In addition to AAHC making additional payment to landlords that re-lease a unit to a voucher holder, AAHC will compensate current landlords for damage claims as an incentive for continued participation in the HCV program.

To incentivize a landlord’s continued participation in the HCV program, AAHC will provide compensation to landlords when the tenant leaves the unit damaged. Landlords will receive compensation for damage claimed not to exceed the lower of the cost of repairs or two months of contract rent. The household’s security deposit must first be used to cover damages and the agency may provide up to two months of contract rent minus the security deposit to cover remaining repairs. Payments will be made to landlords when the next HAP contract is executed between the owner and the AAHC.

Goal:

The goal of this activity is to increase the number of participating owners, expand housing opportunities for participants, and retain landlords’ participation in the HCV program.

Initiative:

AAHC will implement initiatives that seek to incentivize landlords to participate in the HCV program. This activity combined with triennial inspections, HAP direct deposits, rapid initial HQS inspections, and bonus payments are intended to increase and retain landlord participation.

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households: newly admitted and currently assisted

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.

This is the agency first fiscal year. AAHC will implement this activity in the submission year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

	Safe Harbor Waivers.
	Safe Harbor Waivers seeking HUD Approval: None
	Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? None
	What is the status of the Safe Harbor Waiver request? None
	Agency-Specific Waiver(s).
	Agency-Specific Waiver(s) for HUD Approval: <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, Agency-Specific Waivers may be requested.</p> Not requested
	Agency-Specific Waiver(s) for which HUD Approval has been Received: Not applicable

4.c. – Other Landlord Incentives (HCV)

This MTW activity serves the following statutory objectives:

Housing choice

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.

Activity:

Eligible households will participate in the Landlord Incentive Demonstration. In addition, to AAHC making additional payment to landlords who re-lease units to participating families and compensating landlords for damage claims as an incentive for continued participation in the HCV program. AAHC will make payment to the landlord for security deposit, application fees, and holding fees.

Payments for security deposit and rental insurance must not exceed one month’s rent, in total. Households may request assistance for application fees and holding fees for no more than five units for each voucher issued.

Goal:

The goal of this activity is to increase the number of participating owners, expand housing opportunities for participants, and retain landlord’s participation in the HCV program.

Initiative:

AAHC will implement initiatives to encourage landlords to participate in the HCV program. AAHC will implement initiatives that seek to give incentives to landlords to participate in the HCV program. This activity combined with triennial inspections, HAP direct deposits, rapid initial HQS inspections, damage loss payments, and vacancy payments are intended to increase and retain landlord participation.

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households: newly admitted and currently assisted

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.

This is the agency first fiscal year. AAHC will implement this activity in the submission year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Safe Harbor Waivers.

Safe Harbor Waivers seeking HUD Approval:

None

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

None

What is the status of the Safe Harbor Waiver request?

None

Agency-Specific Waiver(s).

Agency-Specific Waiver(s) for HUD Approval:

The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.

Not requested

Agency-Specific Waiver(s) for which HUD Approval has been Received:

Not applicable

5.d. - Alternative Inspection Schedule (HCV)

This MTW activity serves the following statutory objectives:

Housing choice

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.

Activity:

Through the combined MTW activities 4.a. Vacancy Loss Payment, 4.b. Damage Loss Payments, and 4.c. Other Landlord incentives AAHC will implement activities that encourage owner participation in the HCV program. AAHC will inspect assisted units of eligible households once every three years for landlords who are participating in the Landlord Incentive Demonstration. Eligible households and participating landlords may request interim (special/compliant) inspection at any time during the term of the HAP contract. AAHC will comply with HQS inspection standards as found at 24 CFR 982.401. AAHC will inspect assisted units at any time for health and safety, as well as accessibility purposes.

Goal:

The goal of this activity is to increase the number of participating owners, expand housing opportunities for participants, and retain landlord's participation in the HCV program.

Initiative:

AAHC will implement initiatives to incentivize landlords to participate in the HCV program. AAHC will implement initiatives that seek to incentivize landlords to participate in the HCV program. This activity combined with HAP direct deposits, rapid initial HQS inspections, damage loss payments, and bonus payment are intended to increase and retain landlord participation.

This MTW activity has the following cost implications:

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households: newly admitted and currently assisted.

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.

This is the agency first fiscal year. AAHC will implement this activity in the submission year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

	Safe Harbor Waivers.
	Safe Harbor Waivers seeking HUD Approval: None
	Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? None
	What is the status of the Safe Harbor Waiver request? None
	Agency-Specific Waiver(s).
	Agency-Specific Waiver(s) for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested. None Requested
	Agency-Specific Waiver(s) for which HUD Approval has been Received: None Requested

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
Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

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. As of 6/30/2022	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	1
	49%-30% Area Median Income	8
	Below 30% Area Median Income	112
	Total Local, Non-Traditional Households	121

*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?
N/A	0	0	0	0	0	0	0	Not Applicable	N/A	Null	Null	Not Applicable	Not Applicable

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
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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	494
2 Person	228
3 Person	234
4 Person	248
5 Person	120
6+ Person	120
Totals	1444

H.	Public Comment
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.	
Public comment included in Annual Plan	

I.	Evaluations.
See attached	

SAFMR AND FMR Payment Standard Impact Analysis

This analysis must consider the following factors, as applicable:

<p>MTW Activity: Reasonable Rent Policy (2.a.) Payment Standard – SAFMR and (2.b.) Payment Standard FMRs</p> <p>2.a. The agency is authorized to adopt and implement any reasonable policy to establish payment standards based up Small Area Fair Market Rents (SAFMR) and Fair Market Rents (FMR).</p> <p>2.a.i. Payment standard must be between 80% and 150% of the SAFMR.</p> <p>2.b.i. Payment standard must be between 80% and 120% of the FMR</p>
<p>Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution);</p> <p>AAHC does not anticipate that the implementation of these waivers will have a significant impact on staff time. Initial calculations regarding HAP and payment standards for affected families may require a bit more time from our financial staff during the first stages of implementation, but we predict that these effects will be lessened as we continue to issue vouchers using SAFMR and newly adjusted payment standards over time.</p> <p>Average HAP contributions from AAHC will likely increase following the implementation of this waiver. The adoption of new payment standards according to SAFMR will allow for HCV families to move into more desirable, higher opportunity, and more expensive areas of our community.</p>
<p>Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs);</p> <p>AAHC does not anticipate an increase how much affected families will pay toward their housing cost.</p>
<p>Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist);</p> <p>Although it is hard to determine, we anticipate there will be no change in the amount of time families are on the waiting list. AAHC will monitor this activity closely to determine its impact.</p>
<p>Impact on the agency’s termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency);</p> <p>Although it is hard to determine, we anticipate there will be no change in the number of families that are terminated. AAHC will monitor this activity closely to determine its impact.</p>
<p>Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program;</p> <p>AAHC anticipates that the implementation of these waivers will increase our HCV utilization rate, which is currently 89.5%. We expect to increase our number of HCV units following implementation, and therefore similarly expect our utilization rate to increase.</p>
<p>Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice;</p> <p>Implementation of the activity is cost effective because it reduces administrative burden and improves efficiency. This activity supports the MTW statutory objective of increasing housing choice.</p>
<p>Impact on the agency’s ability to meet the MTW statutory requirements;</p>

This activity does not impact our ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. AAHC will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation.

In addition, AAHC will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact of the agency ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards.

Impact on the rate of hardship requests and the number granted and denied as a result of this activity; and

AAHC does not anticipate an impact on the number of hardship requests, granted or denied. AAHC has established a hardship policy. We anticipate no more than 10% of assisted families will request a hardship. AAHC will grant all requests that meet the eligibility criteria and deny all others. Overall, AAHC does not anticipate the rate of hardships having a significant impact on the agency or participating families.

Across the other factors above, the impact on protected classes (and any associated disparate impact).

AAHC can ensure there will not be an impact on protected classes or any associated disparate impact. The agency will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected bases. The agency's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities, and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

ANN ARBOR HOUSING COMMISSION

MTW HARDSHIP POLICY – MULTIPLE ACTIVITIES

The PHA has a written policy for determining when a requirement or provision of a program regulation or MTW activity constitutes a financial or other hardship for the family. This hardship policy is applicable for MTW HCV households as well as non-MTW HCV households.

The policy applies to the follow MTW activities: SAFMR Payment Standard, and FMR Payment Standard. In addition, to the MTW activities the policy applies the non-MTW minimum rent waiver and repayment agreement policy, in accordance with HUD regulation.

PHA Policy

The PHA will review its hardship policy(s) with residents during its intake, and recertification processes. The resident must sign and submit consent forms for obtaining information requested by the PHA necessary to consider if a resident qualifies for a hardship exemption.

The PHA will determine if a resident qualifies for a hardship exemption under the following circumstances:

1. At the time of a potential termination of assistance that is due to an MTW activity
2. When a resident request a hardship exemption from a required MTW activity

The PHA will suspend the activity for the household, beginning the next month after the request, until the PHA has determined if the request is warranted. The PHA shall make determination of whether a financial or other hardship exists within thirty (30) days after the family's request.

Hardship Standard

The PHA will determine what constitutes a hardship. A family may request a hardship for the following circumstances. The family must experience a decrease in income because of changed circumstances, family emergency, divorce, or natural disaster:

1. Loss or reduction of employment
2. Loss of income due to death of the head, spouse, or co-head
3. Reduction in or loss of earnings or other benefit income
4. Awaiting approval for benefit income
5. Such other situations and factors as determined by the agency to be appropriate, such as eviction, termination of utilities, or wage garnishment, divorce, natural disaster, or family emergency.

Exemption Period

If it is determined a qualifying hardship does not exist, the MTW activity will resume. Any amounts owed to the PHA due to the suspension of the MTW activity will be collected through a reasonable repayment agreement.

When a family's request for a financial hardship exemption (other than alternative reexamination schedule) is granted, the PHA will remove the family from the MTW initiative for a period of 6 months. The hardship will be reassessed on **the earlier of** the next scheduled biennial recertification or within 6 months from the date the hardship was approved.

The hardship period ends when at an interim or annual reexamination, the family's calculated MTW TTP is greater than the TTP as calculated under the hardship exemption.

For a minimum rent hardship exemption based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

If the family disagrees with the denial of a hardship request, the family is entitled to and may request an informal hearing.

Reasons of Denial

Hardship request may be denied for the following reasons:

1. Failure to provide verification for loss or reduction of benefit income
2. Failure to provide verification for eligibility of benefit income
3. Failure to provide verification of increased expenses
4. Family is not subject to eviction, utility shut off, or wage garnishment
5. Failure to submit verification for decrease or loss of employment
6. Failure to provide supporting documentation related to loss of income due to death by head, spouse, or co-head
7. Failure to provide supporting documentation related to divorce, natural disaster, or family emergency.

Grievance Procedure

A family may request for second level review of denied hardship requests. The family must submit a request in writing within 30 days the of the PHA written notice.

Reporting

The PHA will keep of all hardship requests received and the results of these requests and supply them at HUD's request. Requests related to the PHA's MTW status will be retained for the duration of PHAs participation in the MTW demonstration program and will be available for public review and inspection at the principal office location during normal business hours.

Agency Analysis of Resident Advisory Board Meeting on November 9th, 2022
Moving To Work Supplement Plan - Ann Arbor Housing Commission

On November 9th, 2022, the Ann Arbor Housing Commission (AAHC) held its annual Resident Advisory Board meeting to present its draft Moving To Work Supplement Plan to the board and general public. The meeting was held from 5pm-7pm and was conducted both in-person and virtually via Zoom. Fifteen (15) non-AAHC staff attended the meeting. The meeting was facilitated by AAHC Deputy Director Weneshia Brand (wrbrand@a2gov.org).

The Ann Arbor Housing Commission was pleased by the plan's reception and the attendees' willingness to contribute criticisms, questions, and suggestions. In general, attendees were supportive of AAHC's plan to use the MTW program to increase housing choice and self-sufficiency among tenants. In addition to the activities planned for the submission year, AAHC also discussed with attendees some MTW activities it may consider implementing in the future; including a tiered rent policy, alternative reexamination schedule, and a minimum rent policy.

Upon entering this meeting, AAHC was unsure of implementing rent-reform activities so quickly after receiving the MTW designation, worrying that it would give tenants too little turnaround time to adjust to policies that would directly impact their finances. The meeting of the Resident Advisory Board helped inform AAHC's decision to postpone the implementation of those activities— residents and community members raised important questions about the possible hardships tenants would experience upon implementation of those activities, re-affirming to AAHC that it should take more time to educate residents about the changes and develop a comprehensive Hardship Policy.

Despite some concerns about the rent reform initiatives planned for future submission years, attendees were receptive to the goals those activities are intended to achieve. In general, their comments revolved around the need to develop a strong Hardship Policy so as to mitigate any potentially negative or disparate effects on tenants. Some attendees also commented on the potential usefulness of alternative allowances and income exclusions in combination with the rent reform activities. AAHC will analyze the impacts these activities would have on its residents in the coming year.

Commentary on AAHC's plan to implement several landlord incentives, including damage loss payments, vacancy loss payments, and other incentives was minimal. One attendee asked about the availability of security deposit assistance. It is likely that discussion on landlord incentives was limited due to who attended the meeting. AAHC hosted an informal meeting with some of its Section 8 landlords in early 2022 regarding MTW activities in which attendees provided much positive feedback on the incentives.