



ANN ARBOR HOUSING COMMISSION

**July 1, 2024 – June 30, 2025
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): 07/01/224</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) 2278</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 checked="" type="checkbox"/> <input 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 type="checkbox"/> <input checked="" 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): See attachment</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"/></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 type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</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.

<p>Fair Housing Goal:</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>Encourage accessible affordable housing units near transit or other key services at activity centers through zoning changes. Support local units to 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 developments in high opportunity markets. For publicly supported housing, coordinate rental inspections process between HUD, MSHDA, and local regulations to avoid duplicative administrative burden.</p>
<p>Fair Housing Goal:</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p>
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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

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

Avalon Housing: A non-profit service provider that the AAHC contracts with to provide services to AAHC residents.

CAN: Community Action Network. A non-profit service provider that the AAHC contracts with to provide services to AAHC residents.

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 Housing Choice Voucher 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 non-profit service provider that the AAHC contracts with to provide services to AAHC residents.

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

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.

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
Siller Terrace	1962	16	1474-1484 Liberty, 1540-1582 Siller, & 528 Virginia
Summation			

AAHC FISCAL YEAR 2024 ANNUAL PLAN

Annual Plan Attachment

Section B.1 Annual Plan Element Proposed Changes FY24

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 FY23, the following administrative policies were adopted by the AAHC Board

Admission and Continued Occupancy Plan

13 -OVER-INCOME FAMILIES

For Public Housing residents, AAHC will terminate the tenancies of families who exceed the over-income (OI) limit for at least two consecutive years (24 consecutive months). The family will be considered public housing families and must be offered the option of paying an income-based rent or a flat rent at their next annual reexamination.

Administrative Plan Policies

6: INCOME AND SUBSIDY DETERMINATIONS

AAHC will exclude the Guaranteed Income to Grow Ann Arbor (GIG A2) monthly stipend from the calculation of annual income. GIG A2 is a two-year guaranteed income pilot program that provides monthly payments of \$528 to 100 entrepreneurs with low and very low incomes in Ann Arbor. Guaranteed Income is applicable to Ann Arbor entrepreneur, small business owner, gig worker, or someone with a side job. GIG A2 Arbor would provide \$528 a month for 24 months to support participants well-being, economic stability, or business growth.

The EID is available only to families that are eligible for and participating on the program as of December 31, 2023, or before; no new families may be added on or after January 1, 2024. If a family is receiving the EID prior to or on the effective date of the HOTMA final rule, they are entitled to the full amount of the benefit for a full 24-month period. The policies below are applicable only to such families. The EID will sunset on January 1, 2026, and the PHA policies below will no longer be applicable as of that date or when the last qualifying family exhausts their exclusion period, whichever is sooner.

7 VERIFICATIONS:

In compliance with Section J.1 of Notice PIH 2023-27, AAHC will begin having families sign the new HUD-9886-A. The new form refers to the family’s ability to revoke consent with respect to the PHA’s ability to access financial records from financial institutions, unless the PHA establishes policies that revocation of consent will result in a denial of admission or termination of assistance. AAHC has established a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance for participating families.

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In compliance with Section J.4 of Notice PIH 2023-27, AAHC will use income determinations from other means-tested federal public assistance programs to verify annual income.

Section J.5 of Notice PIH 2023-27 contains updated guidance for Level 4 documentation (Written Third-Party Verification) to include an original or authentic document generated by a third-party source dated within 120 days of the date received by AAHC, rather than 60 days as is currently required.

In accordance with Section J.5 of Notice PIH 2023-27, AAHC may accept a statement dated within the appropriate benefit year for fixed income sources.

Section J.6 of Notice PIH 2023-27, HUD adjust what HUD considers acceptable documentation of SSN under 24 CFR 5.216(g)(1). AAHC may accept a self-certification and a third-party document (such as a bank statement, utility or cell phone bill, or benefit letter) with the applicant's name printed on it to satisfy the SSN disclosure requirement if AAHC has exhausted all other attempts to obtain the required documentation. If verifying an individual's SSN using this method, AAHC will document why the other SSN documentation was not available.

15: SPECIAL HOUSING TYPES: SECTION VII: HOMEOWNERSHIP

Participants of the homeownership program, receive homeownership assistance payments in lieu of assistance with monthly rent. The AAHC must adopt policies for determining the amount of homeownership expenses that will be allowed within the voucher payment, in accordance with HUD requirements. Staff recommend the board approval the AAHC to amend the policy to include a monthly allowance of \$300 for major repairs and replacements.

16 - VOLUNTARY USE OF SMALL AREA FMRS

AAHC will voluntarily adopt the use of SAFMRs. We will utilize the SAFMRs for both the tenant-based voucher program and the project-based voucher program for the following zip codes: 48103, 48104, 48105, 48109, 48111, 48174, 48187, and 48188, no later than July 1, 2024. The payment standard is 110% of the SAFMR.

17 – PROJECT BASED VOUCHER

If a PHA plans to exceed the cap on the number of units in a project that may have PBV attached for non-elderly families (i.e., the greater of 25 dwelling units or 25 percent of the dwelling units in any project), the Administrative Plan must describe the types of services offered to families for a project to qualify for the exception and to the extent to which such services will be provided. The current Administrative Plan now lists the types of services that may be offered to qualify.

In accordance with PIH Notice 2017-21 states that: "The PBV statute defines project as a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land. This definition was unchanged by HOTMA. PHAs have discretion to define a project within the parameters of the statutory definition. AAHC defines a project as a single building, or as multiple contiguous buildings, or as multiple buildings on contiguous parcels of land."

Related to the definition of a suitable location to include areas that have a high-student population. One of HUD's definitions of a suitable area is one with a poverty level of less than 20%, with some exceptions as described below. Ann Arbor, like other communities with a large population of students in higher education, appear to have high poverty census tracts. All the areas with high poverty census tracts in Ann Arbor are census tracts with high student populations, who self-report their income and are

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considered temporarily in poverty, and who live in high-cost housing. AAHC revised its definition of suitable location to include a project located in a high-poverty census tract where more than 50% of residents are post-secondary students (college students).

TEMPORARY POLICY SUPPLEMENT: EMERGENCY HOUSING VOUCHER (EHV)

AAHC has amended the Administrative Plan to include the new service fee activities to allow payment for rental arrears, storage expenses, or lock change fees, housing mobility services to encourage move to high opportunity neighborhoods, incentives to owners with accessible units who lease to disabled households, support to families to fulfill their obligations under EHV, and household items such as furniture, toiletries, and cleaning supplies.

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Financial Resources:

2024 Planned Financial Sources and Uses		
Federal Sources:	Planned (Est.)	Planned Uses
Moving to Work Housing Choice Voucher Housing Assistance Payments (HAP) & Admin Fees	18,922,000	HCV and PBV HAP & Admin Expenses
EHV/VASH/FUP Housing Choice Voucher Housing Assistance Payments (HAP)	2,510,000	EHV/FUP/VASH HAP
EHP/VASH/FUP Admin Fees	248,000	EHV/FUP/VASH Admin Expenses
Mainstream Voucher Program Housing Assistance Payments (HAP)	1,600,000	HAP Expenses
Mainstream Voucher Admin Fees	130,000	Administrative Expenses
Family Self Sufficiency	232,293	Family Self Sufficiency program
Other (Fraud Recovery)	79,400	Voucher Programs and Central Office
Capital Funds & Operating Funds for Turnkey III	435	Garden Circle (MI064000100)
Non-federal sources (list below)		
City of Ann Arbor General Fund	160,000	Voucher Administration, Central Office, Affordable Housing Development, Tenant Services, and Administrative Expenses
Affordable Housing Millage	14,421,482	Tenant Services and Administrative Expenses
Mental Health Millage Rebate	1,292,616	Tenant Services and Administrative Expenses
Ann Arbor Downtown Development Authority	331,704	Development of City-Owned Properties in DDA District
Other Revenue	4,038,627	Tenant Services and Administrative Expenses & Affordable Housing Development
Total resources	43,966,557	

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Section B.2 and C.1 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 for the MTW Landlord Incentives Cohort. 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 30% 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 Section 18 Repositioning: 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 under the Public Housing 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., including the current resident. The AAHC will dispose of the property through the Section 18 Demo/Dispo repositioning process. as a small PHA. The property will be sold for \$1 to the Ann Arbor Housing Development Corporation, a Michigan non-profit created by the AAHC. Under the Section 18 process, the existing resident must be re-screened for eligibility under the Voucher Program to qualify for a tenant protection voucher. The AAHC will offer the current resident the option to continue living at Garden with a project-based voucher or move with a tenant-based voucher, if qualified. A Section 18 application will be submitted to the SAC by April 2024 and the property will be sold to the AAHDC as soon as HUD approves the transaction. Staff held several meetings with the resident between March 2023 and November 2023. If there are any public housing funds in the fund balance after deducting the reasonable and necessary costs of disposition, the fund balance will be returned to HUD.

Faircloth to RAD: the AAHC has 3 additional units under the Faircloth regulations that can be developed under the RAD conversion process. The AAHC will close out its public housing program after Garden is sold.

New Development: 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 understand the priorities of the community and to start discussing site concepts. The properties are in various stages of development as described below.

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The City of Ann Arbor passed an affordable housing millage for 1 mil for 20 years, which will raise about \$7 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.

AAHC has begun renovating Garden Circle, the only property not converted under the Rental Assistance Demonstration. Renovations will include rehabilitation of the kitchen and bathroom, addition of a second bathroom, and extensive repair to the basement of the three-bedroom single-family dwelling.

b. AAHC acquired Siller Terrace, a 16-unit two and three-bedroom garden style apartment located in Ann Arbor. The property although, not restricted to a special population such as veterans, seniors, or homeless households; units are restriction to household at 60% AMI or less. Any existing over-income tenants will be grand fathered in, but all new tenants must meet the income-restrictions.

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:

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- 121 E. Catherine: Site plan approved for a 63-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.
- 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 (123 W Summit): Lot was split so that the buildable portion is separate from the portion in the floodway.
- 404 N Ashley: on hold until building is vacated
- 353 S Main: Public sewer line extended to site to support future development
- 309 S. Ashley: no activity to report
- Platt/Springbrook: no activity to report

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 FY25.

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

a. Addition of PBV Units:

- i. 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.
- ii. 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.
- iii. The AAHC issued a Project-Based Voucher RFP on October 18, 2023 for up to 50 vouchers. The AAHC conditionally approved 25 unit that will be under Housing Assistance Contract no later than January 1, 2027.

- 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

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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.

- 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 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)

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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; 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 EHV participants. Activities such as housing search assistance, assistance with security

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deposit, utility deposit, rental application, holding fees, and other related uses are intended to prevent and respond to housing instability.

Additional Vouchers

AAHC received 22 new voucher increments from HUD; 16 in October 2022, and 6 in August 2023. 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-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 October 18, 2023

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), Arin Yu (AAHC), Terrance Heiligh (AAHC), Alacia Upthegrove, and Sherry Ragay.

DISCUSSION:

2072 Garden Circle Section 28 Demolition/Disposition

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.

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The Ann Arbor Housing Commission discussed the Final Rule implementing Sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) regulation changes for future adoption, with the Resident Advisory Board:

Section 102: Income Reviews

Fewer Interim Reexaminations: HOTMA creates a 10% adjusted income increase/decrease threshold for conducting Interim Reexaminations, and in most cases requires that increases in earned income are not processed until the next Annual Reexamination, allowing families to keep more of their earnings before receiving a rent increase. The new requirements should lead to fewer Interim Reexaminations overall, alleviating burden for both participants and PHAs.

Streamlined Verifications: Several provisions will streamline the verification process for housing providers.

Adults Only Need to Sign Consent Form Once: HOTMA revises the required consent form that all adult household members sign, allowing them to sign the form only once instead of annually.

Use of Income Determinations from Other Programs: HOTMA allows PHAs to use income determinations made under other federal benefits programs for reexaminations.

Review of EIV Not Required at Interim Reexamination: HOTMA eliminates the requirement for PHAs to use EIV to verify tenant employment and income information during an interim reexamination, significantly reducing administrative burden.

Increased Standard Deduction for Elderly/Disabled Households: HOTMA increases standard deductions for families with a head, co-head, or spouse who is elderly or a person with a disability.

Additional Income Exclusions: The rule codifies additional income and asset exclusions, including:

- Amounts received from Medicaid or other state/local programs meant to keep a family member with a disability living at home
- Veterans' aide and attendant care
- Distributions of principal from non-revocable trusts, including Special Needs Trusts.

Threshold for Claiming Medical/Disability Expenses Increased: HOTMA increases the allowance for unreimbursed health and medical care expenses from 3% of annual income to 10%, phased-in over two years.

Higher Threshold for Imputing Asset Income: HOTMA raises the imputed asset threshold from \$5,000 to \$50,000, incentivizing families to build wealth without imputing income on those assets.

Hardship Relief: HOTMA provides hardship relief for expense deductions, lessening the impact of the increased threshold for medical expenses. HOTMA permits PHAs to grant hardship relief

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to families unable to pay rent because of unanticipated medical/disability expenses and families who are no longer eligible for the childcare expense deduction.

Section 103: Public Housing Income Limit

Public Housing Income Limitation: HOTMA imposes continued program participation limits for families exceeding the statutory income limitation in the Public Housing *program, also known as the “over-income” provision.

Section 104: Asset Limits

Asset Limitation: HOTMA imposes a \$100,000 asset limit for eligibility and continued assistance. Families are also ineligible for assistance if they own real property suitable for occupancy. PHAs have the option of delaying enforcement/termination for up to six months if the family is over the asset threshold at the time of annual reexamination.

Exclusion of Retirement and Educational Savings Accounts: Retirement accounts and educational savings accounts will not be considered a net family asset. This is a major benefit to families, incentivizing savings for important life milestones and opportunities. This will also provide significant administrative relief to PHAs by allowing them to stop verifying and calculating these assets altogether.

Self-Certification of Assets under \$50,000: HOTMA allows self-certification of net assets if estimated to be at or below \$50,000. This will be a time-savings for families and lower administrative burden for PHAs recertifying income.

Cross-Cutting

Adjustments for Inflation: Deductions and the asset limitation will be adjusted for inflation annually, ensuring that deductions do not lose value over time and that families are able to build more wealth without losing program assistance. The current deduction amounts have never been adjusted.

Resident Advisory Board Discussion: None

OTHER RESIDENT INPUT:

Upthegrove: Mentioned that increase the voucher subsidy would be helpful to program participants. She mentions that she needs a six-bedroom house and that there very little housing options available to participants. Asked if her voucher amount would increase because she’s adding another member to the household?

Response: Voucher are issued for one bedroom for every two people in the household. You caseworker can provide specific detail regarding your household.

Ragay: Asked what is the average wait on the programs waiting list?

Response: The average wait is 4 to 6 years for our Affordable Housing or Housing Choice Voucher waiting list.

Ragay: Mentioned that her son has applied for the waiting list. He is currently homeless and needs his own place.

Response: please contact AAHC staff for a more detailed response.

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Section B.7 Public Meeting:

The Public Meeting held on January 10, 2024

This public meeting focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program Supplemental Plan, Hardship Policy, Rent Reform, Agency Specific Waivers, and Safe Harbor.

ATTENDEES: Weneshia Brand (AAHC), Sharice Miller (AAHC), Katrisha Kelly (AAHC), Misty Hendershot (AAHC), Diao Almasser, Jacqueline Lewis, Maureen Kennedy, Bruce Wilcox, Toya Pace (Avalon Housing), Penny Ryder, Ty'esha Gilbert, Nicole Harris, Muyah Graham, Tammy Weatherspoon, Adonis Sweatt, K, Lewis, Kali Muhammad, and Ally Silas.

DISCUSSION:

MTW agencies must work closely with their residents and stakeholders when developing the Agency-Specific Waivers; therefore, similar to submitting Safe Harbor Waivers, when submitting an Agency-Specific Waiver, the MTW agency must not only follow the PHA Plan public process requirements, but it must also have an additional public meeting to specifically discuss the Agency-Specific Waivers.

The Ann Arbor Housing Commission discussed implementing several MTW activities to establish a reasonable rent policy. The following MTW activities were proposed for implement effective no later than January 1, 2025. Minimum Rent at \$130 except for elderly and disabled households. Tenant Payment as a Modified Percentage of Income. We propose to change the total tenant payment (TTP) from 30% of adjusted median income to 15% of adjusted median income. Setting the TTP at 15% is below the allowable maximum of 32% as stated in the Operations Notice. We will request a safe harbor to include elderly and disabled households to benefit from this activity.

In addition, we propose to eliminate Utility Reimbursements payment when the utility allowance is greater than the total tenant payment. The agency proposed to eliminate deductions for \$480 dependent, and \$400 elderly, and disabled deductions for households that are not elderly or disabled. We proposed to implement MTW activity Alternative Income Inclusions/Exclusions to exclude wages for household members between the age 18-23. We will request a safe harbor to include elderly and disabled households to benefit from this activity.

Also, we propose to establish a Payment Standard based on the Small Area Fair Market Rent where allowed and establish grouped zip code when applicable. The payment standard will be between 80% and 150% of the SAFMR. AAHC will also establish a Payment Standard between 80% and 120% of the Fair Market Rent for all other areas. Lastly, we propose to establish an Alternative Reexamination Schedule for households on a biennial (every two years) basis. Households are allowed at least one interim adjustment per year at the request of the household if the gross income has decreased 10% or more. AAHC will complete an impact analysis that is required for all MTW activities. We will establish a hardship policy required for all applicable MTW activities.

Resident Advisory Board Discussion: None

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OTHER RESIDENT INPUT:

Ryder: asked why 48108 is not included in the SAMFR and why we don't service Belleville?

Response:

- 48108 is already at the affordable income level.
- We don't service Belleville due to 6 other agencies already servicing them.
- The higher subsidy at would apply next recert.

Kennedy: asked is the deduction applied to each household member?

Response:

- A household will receive a deduction for each qualifying household member

Lewis: why would they want to eliminate the disability deduction?

Response:

- Eliminating deductions streamlines the recertification process
- Reduces administrative burden

Silas: how many clients pay the minimum rent or \$0- \$50 as their tenant portion of rent?

Response:

- Less than 10% of program participants pay the minimum rent or less.

Pace: could AAHC make utility reimbursement payments to the utility provider instead of to the tenant?

Response:

- Regulations allows AAHC to make payment to utility provider however the PHA must determine a percentage to pay for each utility type.
- AAHC has researched these options and determined the administrative burden is beyond our capacity to manage.

Kennedy: asked how often are participants required to complete the annual recertification?

Response:

- Currently, participants are required to recertify once a year.
- We are proposing to require household to recertify once every two years
- Participants are invited to complete their annual recertifications at least 120 days prior to the annual recertification date.

Kennedy: how would that impact a change or if a family wants to move?

Response:

- Families are allowed to report reductions in income or changes in household composition.
- You must contact your Occupancy Specialist to receive instructions to relocate.

Gilbert: if a participant become employed, does the tenant portion of rent increase?

Response:

- In some circumstances, the tenant portion of rent may increase however it is based on the amount of income and other factors. Please contact your Occupancy Specialist for more assistance.

Lewis: how do you determine what percentage of a building will receive project-based vouchers.

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Response:

- It is determined by the need of the community, the availability of funding and vouchers, and a request for proposal process.

Wilcox: if the minimum rent is increased to \$130 and the utility reimbursement is eliminated how would this impact those households who are zero income?

Response:

- We anticipate those households would be impacted having to seek resources to pay rent or utilities.
- We also anticipate that a reduction in tenant rent payment as a modified percentage of income being reduced from 30% to 15% will encourage household to increase their income and pay less of their income towards rent and utilities.
- AAHC has implemented a minimum rent hardship policy for those who are impacted.
- Elderly and disabled households would be exempt from the \$130 minimum rent.

Ryder: asked if IRA's considered an asset or income?

Response:

- An IRA is considered an asset. When an IRA is withdrawn it may be considered income.

Ryder: mentioned that AAHC staff should meet with participants in person to stress the benefits of any program changes.

Response:

- We ensure that we communicate our policies, programs, meetings, and events with participants by multiple means of communication such as public meetings, in person, by phone, email, mail, and social media.

Section B.7 Public Meeting:

AAHC Rise Hope Partner Meeting held on January 11, 2024

ATTENDEES: Weneshia Brand (AAHC), Sharon Lapidés (WHA), Rhonda Weathers (SOS) Rick Ward (A Brighter Way), Daniel Kelly (SAWC), Aaron Sukanuma (Washtenaw County Sheriff Dept)

This public meeting focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program Supplemental Plan, HOTMA, Hardship Policy, Rent Reform, Agency Specific Waivers, and Safe Harbor. The Ann Arbor Housing Commission discussed implementing several MTW activities to establish a reasonable rent policy. The MTW activities were proposed for implementation effective no later than January 1, 2025.

Lapidés: Inquired if the HOTMA regulations and MTW activities are applied to all housing authorities?

Response: the HOTMA regulation changes are applicable to all PHAs with HCV and Public Housing programs. Some HOTMA regulations are optional to PHA's, however each PHA is required to implement the new regulations no later than January 1, 2025. MTW activities are specific to agencies designated as MTW. All proposed MTW activities are specific to the Ann Arbor Housing Commission.

AAHC FISCAL YEAR 2024 ANNUAL PLAN

Section B.7 Public Meeting:

AAHC Board Meeting held on March 20, 2024

ATTENDEES: Thierry Batalonga, Deanna Boer, Dr. Stephen Daniels, Patricia Jenkins, Matthew Weber, Heather Seyfarth, Jennifer Hall, Arin Yu, and Dharma Akmon

This public meeting focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program Supplemental Plan, HOTMA, Hardship Policy, Rent Reform, Agency Specific Waivers, and Safe Harbor. The Ann Arbor Housing Commission discussed implementing several MTW activities to establish a reasonable rent policy. The MTW activities were proposed for implement effective no later than July 1, 2025. The MTW activities described included: Payment Standard based on SAFMR, Rent Reform, Minimum Rent, Utility Allowance, Alternative Reexamination, Allowable Deductions, Tenant Payment as a Modified Percentage of Income, Income Inclusion/Exclusions.

The following HOTMA changes were described and suggested for immediate implementation: Self-certification of assets up to \$50,000, revised HUD form 9886-A, use income determinations from other means-tested federal public assistance programs to verify annual income, Level 4 documentation (Written Third-Party Verification) to include an original or authentic document generated by a third-party source dated within 120 days of the date received by AAHC, rather than 60 days as is currently required, accept a statement dated within the appropriate benefit year for fixed income sources, and acceptable documentation of SSN. All other HOTMA changes will be adopted in accordance with HUD guidance no later than January 1, 2025, upon completion of HUD system HIP, updated HUD form 50058, and the AAHC's property management software Yardi.

Boer: Inquired if by implementing biennial reexaminations will tenants sign a lease agreement biennially as well?

Response: The tenant lease and biennial reexaminations are two separate documents initiated by two separate authorities (owner and PHA), to initiate two separate activities. The owner (landlord) authorizes renewal of the lease as related to a household's tenancy. Whereas, the reexamination is initiated by the PHA (AAHC) to determine continued eligibility of assistance. As result, the owner will dictate the lease terms and may not be in coordination with the biennial reexamination.

Jenkins: Mentioned that reducing the tenant payment as a modified percentage of income from 30% AMI to 15% AMI is significant and likely to benefit several households.

Batalonga: Inquired of increasing the minimum rent from \$50 to \$130 and it's impact on extremely low income and zero income households.

Hall: Expressed that the minimum rent activity warrants more conversation with program participants and local nonprofits. Hall inquired how many households would be impacted.

Response: Data shows around 17% of households may be impacted by increasing the minimum rent. AAHC will ensure to communicate to current program participants of this policy change by mail, email, website, and flyer. AAHC plans to continue to hold public meetings with participants to discuss this topic and other policy changes for the next 12 months prior to implement any MTW activities. Participant will be informed how this change may impact them, what steps to take if they experience hardship, and AAHC will continue to work with community providers to coordinate support services as needed.

AAHC FISCAL YEAR 2024 ANNUAL PLAN

Weber: Inquired about household income calculations, what percentage of participants are non-compliant. What measures will be taken if a household is found non-compliant.

Response: It is estimated that less than 10% of participants have un-reported or under reported household income. AAHC continues to utilize systems such as EIV to identify income discrepancies. We expect that excluding wages of household members between ages 18-23 will significantly reduce the number of income discrepancies. AAHC will take action to recover housing assistance overpayments.

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 7/1/2024 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

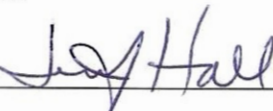
I hereby certify that all the statement above, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Executive Director:

Jennifer Hall

Name of Acting Board Chairperson: Deanna Boer

Signature



Date 3/21/2024

Signature



Date 3/21/24

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 2024/2025 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 tenants 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:  03/05/2024	Date: 03/05/2024

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 X 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 7/1/2024, 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 of Board Chair

Signature

Jennifer Hall

Date 3/21/24

Lenna Boer, Date 3/21/24

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.

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.

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. [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. [Text box]</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>Yes/No [If Yes]: NO 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. [Text box]</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>Yes/No/Already provided YES [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 YES [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? [Text box] NO
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?	<input type="text" value="0"/> [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 YES [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 YES [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.	[Text box] N/A
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] N/A

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.	[Text box] N/A
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 [Text box] Stepped rent schedule [Upload document] N/A

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.		N/A	
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 [Text box]	
1.e., 1.f. - Minimum Rent (PH & HCV)		Input options and instructions	
How much is the minimum rent or minimum Total Tenant Payment (TTP)?		\$ <u> N/A</u> [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)?		<u> N/A</u> %	
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.		[Text box] N/A	
1.k., 1.l. - Fixed Rents/Subsidy (PH & HCV)		Input options and instructions	
Describe the method used to establish the fixed rents.		[Text box] N/A	
How many households are currently subject to this policy?		[Text box] N/A	

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.] N/A	
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?		<u> N/A</u> %	
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?		___ N/A [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) ___ Dependent allowance ___ Unreimbursed childcare costs ___ 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?		[Text Box] N/A
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.		[Text box] AAHC applied both grouped and PS by zip within the range of 80-120% of the SAFMR
2.b. - Payment Standards – Fair Market Rents (HCV)		Input options and instructions
Please explain the payment standards by FMR.		[Text box] PS are set at 120% of 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.		[Text box] N/A
2.d. - Rent Reasonableness – Third-Party Requirement (HCV)		Input options and instructions
Please explain or upload a description of the quality assurance method.		[Text box] and [Upload file] options
Please explain or upload a description of the rent reasonableness determination method.		[Text box] and [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) ___ Once every two years ___ Once every three years ___ 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.		[Text box]
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?	[Text box] UP TO TWO MONTHS CONTRACT RENT LESS SEC. DEP
How many payments were issued under this policy in the most recently completed PHA fiscal year?	<u>31</u> [number of payments]
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	\$ <u>26908</u>

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?	<u> </u> [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?	[Text box]
How many penalty payments were charged under this policy in the most recently completed PHA fiscal year?	<u> </u> [number]
5.c. - Third-Party Requirement (HCV)	Input options and instructions
Please explain or upload a description of the quality assurance method.	[Text box] and [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?	<u> </u> [number of months]
How is the tenant contribution established for this program?	[Text box]
How many households do you expect to serve in this program in the Fiscal Year?	<u> </u> [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?	[Text box]
Please list any partner organizations and briefly note the services that each provides.	[Text box]

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.]
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9.c. - Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement (HCV)	[No custom questions for this activity.]
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9.d. - Alternative PBV Selection Process (HCV)	[No custom questions for this activity.]
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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.]
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9.g. - Increase PBV Rent to Owner (HCV)	[No custom questions for this activity.]
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9.h. - Limit Portability for PBV Units (HCV)	[No custom questions for this activity.]
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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.]
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?	[Text box] N/A

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. [Text box]
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?	[Text box] N/A

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. [Text box] N/A
What counts as “work” under this the work requirement MTW activity?	[Text box]
How will the MTW agency monitor compliance with the work requirement MTW activity?	[Text box]
What supportive services are offered to support households to comply with the work requirement?	[Text box]
How does the agency address noncompliance with the work requirement policy?	[Text box]
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? [Text box]

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
N/A		

17.b. - Service Provision	Input options and instructions
What types of services is the MTW agency providing?	[Text box]
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				
<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 				

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				
<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 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 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	#
49%-30% Area Median Income	#
Below 30% Area Median Income	#
Total Local, Non-Traditional Households	#

*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 timeline. [Text box] NO

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	#
2 Person	#
3 Person	#
4 Person	#
5 Person	#
6+ Person	#
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
Please attach a narrative describing the MTW agency’s analysis of the comments and any decisions made based on these comments.	Upload Attachment
If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
If yes, please attach the comments received along with the MTW agency’s description of how comments were considered.	Upload Attachment MTW SUPPLEMENT PLAN PUBLIC COMMENT

I	Evaluations.
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

Question	Input options and instructions
Does the PHA have an agency-sponsored evaluation?	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 (07/01/2024 ___), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

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).

Deanna Beer
NAME OF AUTHORIZED OFFICIAL

ACTING BOARD CHAIR
TITLE

Deanna Beer
SIGNATURE

03/20/2024
DATE

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

PHA Name : Ann Arbor Housing Commission

PHA Code : MI064

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2024

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

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

C. MTW Activities Plan that Ann Arbor Housing Commission Plans to Implement in the Submission Year or Is Currently Implementing

2.a. - Payment Standards- Small Area Fair Market Rents (HCV)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>Adopt and implement a reasonable policy to establish payment standards based upon Small Area Fair Market Rents (SAFMR). AAHC seeks to increase housing opportunity for program participants. This MTW activity contributes to the AAHC seeks to improve relationship with landlords, ensure our efforts matches those of the local market, recruit and retain landlord participation, apply measure to offset rent burdens, and encourage move to high opportunity areas.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>After establishing payment standards using SAFMR, participants residing in high opportunity areas have increased. In addition, rent burden decreased for those participants who previously lived in those low poverty areas.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the hardship policy apply to more than this MTW activity?</p> <p>Yes</p>
<p>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p> <p>2.b. - Payment Standards- Fair Market Rents (HCV)</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p> <p>No</p>
<p>How many hardship requests have been received associated with this activity in the past year?</p> <p>No hardship were requested in the most recent fiscal year.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

2.b. - Payment Standards- Fair Market Rents (HCV)

Please explain the payment standards by ZIP code or "grouped" ZIP codes:

AAHC established payment standards based upon the SAFMR for the following ZIP codes: 48103, 48104, 48105, 48109, 48111, 48174, 48187, and 48188.

2.b. - Payment Standards- Fair Market Rents (HCV)

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

Our agency established payment standards based upon 120% of the Fair Market Rents (FMR). The MTW activity will reduce rent burden of current participants and increase housing opportunities. Our agency intends to utilize this MTW activity to match local rental markets in an effort to retain and recruit landlord participation in the HCV program.

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

Cost effectiveness; Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

Our agency has retained several landlords and reduced rent burden after implementing this activity.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

Please explain the payment standards by FMR:

The payment standard is set at 120% of the FMR within the PHA jurisdiction of Washtenaw and Monroe Counties; including those designated areas where the payment standard would be lower if the agency established a payment

standard based on the SAFMR.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)

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

AAHC offers incentives to participating landlords by providing vacancy payments to the owner. Our goals is to retain and increase the number of landlords it is working with and expand into new neighborhoods. We intend to address specific landlord issues such as, reluctance to join the HCV Program due to delays in leasing and costly repairs, in a effort to build and improve partnership between the landlord and PHA.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

Currently assisted households only

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all tenant-based units

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

Since implementing this activity the number of inquires from new owners have increased. In addition, current owners are less incline to end their participation in the HCV program.

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

No

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

To all units

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

Payments made to the landlord must be equal to no more than one month of the contract rent.

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

1

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

\$1,800

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

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

AAHC encourage landlord participation by providing for compensation payments to the owner when the HCV participant causes damage to the unit. Our goals is to retain and increase the number of landlords we're working with and expand into new neighborhoods. We intend to address specific landlord issues such as, reluctance to join the HCV Program due to delays in leasing, costly repairs, in a effort to build and improve partnership between the landlord and PHA.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

Currently assisted households only

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity applies to all current tenant based voucher participants and project-based voucher participants.

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

Since the agency has implemented this MTW activity we have retained several landlords who participant in the HCV program.

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

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for

example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?

To all units

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

The amount of damage claims must not exceed the lesser of the cost of repairs or two months of contract rent. In implementing this activity, the participant'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.

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

31

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

\$26,908

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

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

AAHC provides incentive payments such as security deposit, application fees, and signing bonus to participating landlords. Incentive payments are used in order to recruit new landlords to join the HCV program. By implement this activity we intend to increase housing choice for program participants.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity is available to both tenant-based and project-based participants.

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

Since implementation of this MTW activity, AAHC has initiated HAP contracts with new owners.

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

No

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

To all units

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

Payments made to the landlord must be equal to no more than one month of the contract rent.

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

40

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

\$19,230

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

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

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
2023	\$7,683	\$7,683	\$0	2023-06-30

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	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	Total Local, Non-Traditional Households	0

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

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

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.
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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.

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

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

I.	Evaluations.
	No known evaluations.

SAFMR AND FMR Payment Standard Impact Analysis Fiscal Year 2024/2025

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 Occupancy Specialist 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>Has any change in the amount of time families wait for assistance: No</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>Termination rate of families: Decreased</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. We expect to increase our number of HCV units following implementation, and therefore similarly expect our utilization rate to increase.</p> <p>Has utilization rate increase since last fiscal year: Yes</p>

Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice;
<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>
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 very low-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.</p> <p>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.</p> <p>At least 75% of all new admission are very low income: Yes Assisted households are a comparable mix of household by family size: Yes</p>
Impact on the rate of hardship requests and the number granted and denied as a result of this activity; and
<p>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.</p> <p># of Hardship Request: 0 # Denied: 0 # Granted:0</p>
Across the other factors above, the impact on protected classes (and any associated disparate impact).
<p>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.</p>

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 October 18, 2023
Moving To Work Supplement Plan - Ann Arbor Housing Commission

On October 18, 2023, 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. Two (2) non-AAHC staff attended the meeting. The meeting was facilitated by AAHC Deputy Director Weneschia 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 eliminating utility reimbursement, increase minimum rent, eliminate allowable deductions, exclude wages for household members age 18-23, increase payment standard using SAFMR and FMR, alternative reexamination schedule, and setting total tenant payment at 15%.

As a result of poor attendance of the October meeting, we held three additional public meetings (see Public Comment Notes) to obtain resident and public input. 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.

Residents and community members raised important questions about the possible hardship's tenants would experience upon implementation of an increased minimum rent and eliminating utility reimbursements. AAHC will hold more tenant meetings over the next few months to bring awareness and prepare residents about the changes and develop a plan to assist those who may experience a hardship.

We continue to attend and host public meetings and events to inform participants, partners, and owners of the HCV program policies and efforts. Data shows that non-voluntary terminations have decreased since implementation of MTW landlord incentives. On average new admissions lease within 60 days of voucher issuance and landlord participation has increased slightly.