

Spartanburg Housing Moving to Work (MTW) Plan



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I. Introduction

The Housing Authority of the City of Spartanburg, formally known as Spartanburg Housing, ranked among high performing agencies eligible to apply for the U. S. Department of Housing and Urban Development (HUD)'s Moving to Work (MTW) Demonstration Program. In total, there are currently 39 housing authorities in the United States that are authorized to operate as an MTW agency. In 2016, officials granted authorization that included an expansion of 100 additional agencies over seven years. The MTW expansion allows housing authorities to design and test innovative approaches that promotes self-sufficiency and caters to the design of strategic initiatives that addresses the needs of residents. Spartanburg Housing submitted a letter of interest to participant in the cohort #2 phase, if selected, our agency will evaluate implemented rent policies to increase resident self-sufficiency and reduce administrative burden. Through a vigorous assessment of our community needs, Spartanburg Housing developed a formally structured action plan, that would successfully implement the move to work demonstration program in the County of Spartanburg, SC. The following details are provided below.

II. Moving to Work Plan for Spartanburg

A. Vision for Spartanburg Housing

The Spartanburg community is composed of a population of roughly 320,000 residents. Being the 5th most populous county in South Carolina, our agency seeks to identify barriers that affects the quality of life, while promoting self-sufficiency opportunities for families. Through strategic partnerships, Spartanburg Housing will aid in fostering the counties efforts to move towards collective impact, while being a pillar of the community.

Spartanburg Housing is the fourth largest housing authority in South Carolina and serves over 6,500 people. The mission of Spartanburg Housing is to develop, manage, and provide diverse,

quality housing and programs to promote self-sufficiency. Our vision is to impact quality of life through housing by enhancing economic mobility for the families we serve, strengthening communities, and creating strategic partnerships. We offer services to low-income residents beyond lease and property management to address health, education, employment, and safety needs.

If granted the MTW authority, Spartanburg Housing will utilize the flexibilities to further our mission and vision to create more affordable housing options to enhance the housing continuum, address economic mobility and assist families with achieve self-sufficiency, and realize operational efficiencies that will enable to best utilize and leverage our resources. The five strategic priorities for Spartanburg Housing are: 1) Enhance Organizational and Operational Excellence, 2) Ensure Sound Financial Management for Long Term Sustainability, 3) Preserve and Develop the Housing Portfolio, 4) Engage in Strategic Partnerships and 5) Support and Develop Resident and Community Engagement.

Description of Experience and Skills: Below is the Spartanburg Housing team with primary responsibility for the administration of our local program.

Shaunté Evans, Chief Executive Officer, has over 20 years of experience as a housing professional. She has over 12 years of experience administering a MTW program while serving as the Executive VP of Administrative Operations at the Charlotte Housing Authority (now Inlivan). Shaunté helped create the structure for the MTW planning and reporting for all departments, resident and community engagement, establishing baselines and benchmarks, secured University of North Carolina Chapel to serve as a research partner, and served as the MTW liaison with HUD.

Jessica M. Holcomb, Chief Operating Officer, has over 9 years' experience at Spartanburg Housing where she has served in multiple capacities including Property Administrative Associate,

Property Asset Manager, Project Manager, Deputy Special Assistant and Deputy Director of Asset Management and Special Projects. Jessica supervises both the Asset Management and Housing Choice Voucher Departments and manages the Information Technology functions. Jessica completed PHADA's Executive Director Education Program in January 2018.

Tiffany Askew, Director of Leased Housing has worked in the housing industry for over 20 years. She currently manages the Housing Choice Voucher Program with a total of 1,715 vouchers, 367 Rental Assistance Demonstration vouchers, 273 Project Based Vouchers, and 190 Moderate Rehabilitation units. She also administers a Tenant Based Rental Assistance Program with funds totaling \$400,000 from Spartanburg County.

Cierra Fowler, Director of Resident Services and Community Engagement provides individuals we serve with resource information, referrals for services, on site community initiatives, and supports a team of service coordinators. Cierra has 10+ years in service and engagement coordination, community events, and case management. Cierra has experience in Corporate Fundraising and multiple organization initiatives. Cierra has coordinated with agencies within our community for job training, employment opportunities, educational resources, and employment screenings for individuals we serve.

Ashley Campbell, HCV Housing Specialist, assists with the daily operational duties surrounding the implementation of the Housing Choice Voucher Program. Ashley has over 5 years of experience advocating for adequate housing options for program participants. She has served as a committee member, strategizing with local partners to enhance the delivery of services within our community which has prompted the ability to assist families with obtaining necessary resources. Ashley has supported upper leadership in developing and implementing procedural changes necessary in the HCV Department.

Statement of Fair Housing

In March 2017, the City of Spartanburg, Spartanburg County, and the Spartanburg Housing Authority entered a collaborative partnership to prepare an Assessment of Fair Housing (AFH) Study. Spartanburg County's Community and Economic Development Department lead the effort in support of SHA and the City to select consultant Mosaic Community Planning, LLC to prepare the study. Over a course of nine months, the three partners gathered information from stakeholders, over 250 resident surveys, and six public meetings. The completed document, the Joint Analysis of Impediments to Fair Housing Choice was submitted to the U.S. Department of Housing and Urban Development – Fair Housing Division for review. The completed document provides the partners with six (6) impediments that should be addressed over the next 3-5 years.

1. Impediment #1: Lack of Geographic Diversity in Affordable Housing Choices
2. Impediment #2: Neighborhoods Need Placed-Based Community Investments
3. Impediment #3: Need for Continued and Expanded Fair Housing Activities
4. Impediment #4: Affordable Housing Planning Lacks Equity Focus
5. Impediment #5: Limited Housing Options for People With Disabilities
6. Impediment #6: Weak Jobs-Transit Connection

B. Future Community/Resident Engagement

Community engagement remains a top priority and presents the opportunity to stay actively engaged with stakeholders and the broader community. Spartanburg Housing will continue to maximize all communication methods among community partners, to ensure our dedication in delivering valuable services to families, hosting community events, and workshops. Our agency will continue to stay connected with the public through mass email delivery, social media tactics, via phone, and face-to-face interactions, if timing permits. Properly held sites meetings will serve

as an additional measure to share information and encourage feedback from the public. Spartanburg Housing has hosted Community Stakeholder meetings to discuss the work of the organization and will resume the meetings (in person or virtual) the first quarter of 2021. The plan is to host stakeholder meetings two to three times each year. Stakeholder meeting attendees includes, but is not limited to, residents, elected officials, staff from the City of Spartanburg, Spartanburg County, partner agencies, and local funders. We will increase engagement of HCV participants through the production of a newsletter and by other social media platforms.

We recognize families may have barriers that limit their ability toward employment. Our resident services department will continue to make referrals to local partners and agencies to address their basic needs toward a self-sufficiency standard in our community. Our agency currently provides the following workshops quarterly to those we serve: financial literacy, financial goal setting, developing a savings account, and gaining and maintaining employment. The MTW designation will allow Spartanburg Housing more flexibility and the ability to offer additional incentives with our sponsored events and workshops.

C. Operating and Inventory Information

Today, after over eighty years of service, Spartanburg Housing is a real estate owner and property management company that serves over 3,596 families under its various housing programs. (See Tables below) With approximately 40 employees, Spartanburg Housing contributes economically to the City of Spartanburg through our employment base and management and through the maintenance of our housing operations. The organization infuses over \$12 million dollars annually into the local economy directed toward the purchase of goods and services, payroll, rents to landlords, development of new housing, and through the payments in lieu of taxes.

Spartanburg Housing has successfully implemented two HOPE VI Revitalization Grants, each in excess of \$20 million. The organization has also successfully applied for, received and implemented many additional grants and programs including: Capital Fund Recovery Grant, ROSS FSS for Public Housing and HCV Section 8, ROSS Service Coordinator Grants, DOL YouthBuild Grants, DOL Faceforward grants, Elderly and Disabled Grants and many others.

Spartanburg Housing is designated as a High Performing Agency by the U.S. Department of Housing and Urban Development in the Section 8 (HCV) Program and Standard in the Public Housing Program.

Spartanburg Housing strives to assist in addressing the needs of low-income, very low-income, and extremely low-income families in the City of Spartanburg and Spartanburg County. We do this through the Asset Management Program, Housing Choice Voucher (HCV) Program, Mod Rehab Program, and other Affordable/Moderate Income Programs, HUD’s Rental Assistance Demonstration (RAD) program, and the Tenant Based Rental Assistance (TBRA) Program. Families served are within the maximum income limit of the 80% median family income for Spartanburg County. Rent payments are based on adjusted annual income.

Table 1

Spartanburg Housing Voucher and Unit Count		
Program	# of Units	# of Vouchers
Public Housing	527	
Housing Choice Voucher (HCV)		1,715
Mod Rehab		190
Mainstream Vouchers		150
Project Based Vouchers		273
Affordable/Moderate Income/HOME/Multifamily/PBRA	345	
RAD		367
Tenant Based Rental Assistance		24
VASH		5
Total	872	2,724

Table 2

Public Housing Properties					
Site	Location	Housing Type	Number of Units	Bedroom Sizes	% Elderly/Disabled
Archibald Rutledge	N. Church St.	Family	150	0-1	85%
Archibald Village	W. Centennial St.	Family	50	0-2	88%
Camp Croft Courts	Hanover Pl.	Family	96	1-3	54%
Cambridge Place	Brawley St.	Family	6	3	0%
Prince Hall	Prince Hall Ln.	Family	100	2-3	18%
Scattered Sites	Various	Family	15	3-4	37%
Southside Projects	Rev. Booker T. Sears St.; Caulder Ave.; Southport Ridge Dr.	Family	110	1-3	29%

D. Plan for Spartanburg Housing’s MTW Program

The following section describes the selected initiatives proposed for Spartanburg Housing’s local MTW Program. Each initiative developed for our agency seeks to promote cost effectiveness from an administrative perspective, enhances self-sufficiency opportunities for our families, and aids in creating more housing choices for program participant. In addition, our reasoning for implementing each selected initiative are outline, which contributes towards identifying and addressing the needs of our community.

Statutory Objective: Cost Effectiveness

Spartanburg Housing will focus on implementing initiatives that aid in reducing costs and achieving greater cost effectiveness.

Initiative 2021-1: Create an Alternative Utility Allowance Schedule (PH/HCV) HCV: The agency may create a utility schedule(s) for all HCV units based upon bedroom size, the unit location and/or the types of utilities paid by participant. The agency may establish a site-based utility allowance in PBV. **PH:** The agency may create a utility schedule(s) for all units.

Spartanburg Housing will follow all safe harbors related to this initiative to include reviewing allowances for a 10% change and not including items that are excluded from HUD regulations.

Initiative 2021-2: Modify Existing Deductions (PH/HCV): The agency will replace existing deduction(s) with a single standard deduction(s). Spartanburg Housing will follow all safe harbors related to this initiative to include conducting and impact analysis and implementing a hardship policy.

Initiative 2021-3: Alternative Inspection Schedule (HCV): The agency is authorized to establishing a local inspection schedule for all or a portion of its HCV units. Spartanburg Housing will follow all safe harbors to include inspecting units at least once every three years and not altering the inspection standards.

Initiative 2021-4: Eliminate Utility Reimbursement Payments (PH/HCV): The agency will eliminate utility reimbursement payments in the Public Housing/HCV programs when the utility allowance is greater than the total tenant payment. Residents receiving a utility reimbursement payment are grandfathered in for a designated number of months. No new instances of Utility Reimbursement Payments are allowed after identified timeframe or when a resident becomes employed. (whichever occurs first).

Initiative 2021-5: Modify Rent Reasonableness (HCV): The agency is authorized to develop a local process to determine rent reasonableness that differs from the currently mandated program requirements. Spartanburg Housing will perform rent reasonable determinations on Project Based Voucher units that it owns, manages, and/or controls.

Initiative 2021-6: Modify the Reexamination Schedule (PH/HCV): The agency is authorized to implement a reexamination program that differs from the reexamination program. Agencies must continue to determine the initial eligibility of the family in accordance with current

provisions. 1) Triennial recertifications will be completed for HCV and PH households where the head, co-head or spouse is elderly or over age 55 and disabled and the only source of income for the household is Social Security (SS) or Disability (SSI). 2) Wage earning families with 12 consecutive months of employment will recertify biannually. 3) Households who report zero income or are in between jobs will recertify annually.

Initiative 2021-7: Minimum Rent (PH/HCV): The agency is authorized to set a minimum rent that is higher than allowed under current statute and regulation. Spartanburg Housing will consider implementation of a gradual increase not to exceed \$125 per month. The agency will conduct an impact analysis and implement a hardship policy.

Initiative 2021-8: HQS Third-Party Requirement (HCV): The agency is authorized to perform HQS Inspections on PBV units that it owns, manages, and/or controls. Spartanburg Housing will establish and make available a quality assurance method to ensure an objective analysis and implement all Safe Harbors.

Statutory Objective: Self-Sufficiency

Spartanburg Housing, in collaboration with our community partners, will support families as they move towards self-sufficiency.

Economic Mobility: Spartanburg Housing would like to use MTW flexibility to help address economic mobility. The families we serve often have the fewest opportunities to move up the economic ladder. We will work with our community partners to provide more targeted education and workforce preparation and collaborate to help people move out of low opportunity areas.

Cliff Effect: Spartanburg Housing will work with the United Way of the Piedmont, and other partners, to determine how to address the Cliff Effect which impacts many of the families we serve. United Way of the Piedmont's Financial Stability Taskforce have identified the cliff effect as one

of the primary barriers to economic self-sufficiency in our community. The cliff effect occurs when a family begins to earn above the limits set by the state and becomes ineligible for subsidies on food, housing, childcare, and other benefits. However, the family's increased income from wages does not equal or exceed the loss in benefits, creating a significant gap in their basic needs budget.

Initiative 2021-7: Work Requirement: Spartanburg Housing will gradually implement a work requirement through employment, education, and job training totaling 15 hours per week.

Initiative 2021-8: Family Self Sufficiency (FSS): The agency will also include a MTW FSS program to encourage 5-year goals, escrow incentive, and supportive services. The agency will employ a case manager to assist with coordination of referrals, assessments, and services with identified community partners. If a participant is not employed. The case manager will specify the job training and/job search activities the participant must undertake to meet programs work requirements. The program will remain a voluntary program in accordance with the FSS program and individuals not in compliance will be terminated from the program. The agency will change the escrow process based on income.

Initiative 2021-9: FSS Agreement: Spartanburg Housing currently operates a Family Self Sufficiency program and will continue to operate as approved for the grant position. The MTW FSS will waive current contract of participation and create an internal agreement. The program will address and provide more incentives for low and moderate-income individuals who are often unable to escrow in our traditional program. This new escrow will allow more savings based on income to allow families an opportunity to be more self-sufficient.

Statutory Objective: Housing Choice

One of Spartanburg Housing's strategic priorities is to preserve and develop the housing portfolio. Our short-term goal is to develop 200 units by 2023. We will utilize the MTW funding flexibility

to create more housing opportunities to meet our goal and aid in decreasing the affordable need in Spartanburg. In addition, we plan to implement initiatives that will expand housing opportunities for families.

Initiative 2021-10: Local, Non-Traditional Activities-Housing Development Programs: The agency will establish programs that use MTW Funding to acquire, renovate and/or build affordable units for low-income families that are not public housing units. Spartanburg Housing will follow all safe harbors related to this initiative.

Initiative 2021-11: Landlord Incentives (HCV-Tenant-Based Assistance): Landlords may be eligible to receive a one-time monetary incentive upon the execution of a contract for new units. Leasing incentives are implemented to strengthen the partnership with community landlords and promote housing choices for program participants. Agencies may target incentive payments to landlords leasing properties in high opportunity neighborhoods or in areas located where vouchers are difficult to use as defined in an agency's Administrative Plan. Spartanburg Housing will follow all safe harbors related to this initiative to include not making payments that exceed one month of contract rent.

Initiative 2021-12: Initial Rent Burden (HCV): To increase housing options for residents, the agency will modify the existing 40% initial rent burden income cap for the HCV voucher program, prompting an increase of 45% to 50%.

Spartanburg County overall is a high-cost rental market, and specifically in areas of higher opportunity. The rent and utilities are often more than the established payment standards. This activity allows Housing Choice Voucher Program participants, when entering a new lease with a new landlord, the option to pay more than a higher percentage of their adjusted income on rent and utilities. This may help participants, especially those that decide to move because of the proposed

program changes, with the option to pay more for a unit than what was previously allowed and the ability to find housing in areas of de-concentration.

Spartanburg Housing will follow all safe harbors related to this initiative to include not allowing the family share at initial occupancy to exceed 60% of family's monthly income.

Initiative 2021-13: Payment Standard Increase: The agency may establish a payment standard up to 120% of the FMR to help move families to areas of higher opportunity. Spartanburg Housing will follow all safe harbors related to this initiative to include implementing an impact analysis and implementing a hardship policy. Establish the PMS at 120% will allow the families to locate housing in the more desirable areas of Spartanburg County.

E. Proposed Use of Funds

Spartanburg Housing requests authorization to use public housing and housing choice voucher funding flexibly to best meet the local need. We plan to use the funds in the following ways: 1) Leverage funding for developing or preserving affordable housing units, 2) Offset costs associated with research for the MTW program, 3) Workforce development and training, 4) Strategies related to addressing the Cliff Effect and Economic Mobility, 5) Provide supportive services, 6) Implement Landlord Incentives, 7) Increased Payment Standards, and 8) Non-traditional activities.

F. Evidence of Significant Partnerships

Spartanburg Housing continues to be a pillar in the community and believes in the importance of collaborative partnerships to achieve desired outcomes for the MTW program. Spartanburg County is one of our key partners in our efforts to provide housing solutions throughout Spartanburg County via the Tenant Based Rental Assistance (TBRA) program.

Our agency is an active partner of the United Way of the Piedmont's (UWP) Financial Stability Task Force and Opportunity Housing Collaborative. The goal of the Taskforce is to decrease the number of people in our community living below self-sufficiency by 10% by 2030. The Task Force

forms partnerships with local nonprofit and social service organizations, city and county governments, and corporate employers to implement solutions and leverage resources to address the root causes of our community's unmet needs, including financial literacy education, affordable housing, reliable transportation, workforce development opportunities, and mentors and coaches. To address local housing challenges, UWP convenes the Opportunity Housing Collaborative (OHC) focused on quality, affordable housing for lower-income residents. The OHC is currently developing a housing action plan to identify and implement specific housing strategies to address issues of affordability, accessibility, and equity.

Spartanburg Housing has coordinated efforts with the City of Spartanburg and SC Works of the Greater Upstate to assist with the implementation of our work program. The City of Spartanburg's Office of Equity and Inclusion will provide Life Skills and Soft Skills training for participants. Through assessments of individuals unemployed the case manager will be able to identify if an individual will be required for both trainings or only soft skills training to prepare for the workforce environment. If an individual has not worked in over a year, they will need to attend both trainings. If an individual loses a job more than twice not due to reduction in the workforce, they will also need to attend both trainings. The City of Spartanburg has received a grant to provide the needed courses and will allot several slots through our MTW program.

Spartanburg Housing currently has a Memorandum of Understanding agreement with SC Works of the Greater Upstate. Through this partnership the agency provides workshops on resume building, employment search, interviewing skills, and individual career counseling for Spartanburg Housing residents. We have an established referral form to better serve families and track success. Our hope with the work requirement implemented there will be an increase in participation to engage individuals in the benefits of improving their skills, allow them to gain

additional knowledge, and find paths that will be meet their needs. Our local agency currently has the Workforce Innovation and Opportunity Act (WIOA) which is designed to develop a skilled workforce that meets the needs of business and industry to compete in a global economy by helping jobseekers access training, education, and employment. They will assist in training, employment, and supportive services apart of our shared vision for MTW.

Our agency will continue to partner with the Spartanburg Academic Movement. The Spartanburg Academic movement focuses on cradle to career in our community through substantial student research for improved outcomes and success. We actively participate in the Out of School Time Collaborative (OST), this network was created to provide equitable high-quality afterschool and summer programming. We have an agreement as a partner in this collaborative with other great community partners to provide services to our youth. Spartanburg Housing recognizes the importance of out of school time programming for the youth and the entire family as we continue to promote work and self-sufficiency.

G. Rent Reform

A. Alternative Rent Policy Section and Rationale

Spartanburg Housing will implement MTW Test Rent #2 and will establish a stepped rent schedule over the six-year test study period. The rent for each step is set as 4% percentage of the FMR, adjusted by number of bedrooms. See Table 3 for the proposed schedule with 2021 FMR for each unit size. After year 1, each household automatically advances to the next step on an annual basis. Income reexaminations occur every three years to verify eligibility. At each step, the rent increases by 4% of the FMR (see Table 3).

Rents are increased annually (or, in the HCV program, the participant contribution increased) according to a fixed schedule of 4% of Fair Market Rent (FMR) by bedroom size. These increases

are unrelated to the income of the assisted household. The alternative rent schedule will be beneficial for the selected assisted households because it will allow the participants to be aware of the increase in the rental amount and be prepared to budget for the upcoming additional rent.

Table 3

Stepped Rent: 4% 2021 FMR							
Step	%FMR	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
		\$695	\$735	\$845	\$1,113	\$1,163	\$1,337
1	4%	\$27.80	\$29.40	\$33.80	\$44.52	\$46.52	\$53.48
2	8%	\$55.60	\$58.80	\$67.60	\$89.04	\$93.04	\$106.96
3	16%	\$111.20	\$117.60	\$135.20	\$178.08	\$186.08	\$213.92
4	20%	\$139.00	\$147.00	\$169.00	\$222.60	\$232.60	\$267.40
5	24%	\$166.80	\$176.40	\$202.80	\$267.12	\$279.12	\$320.88
6	28%	\$194.60	\$205.80	\$236.60	\$311.64	\$325.64	\$374.36

Spartanburg Housing seeks to give families the opportunity to obtain employment and become economically self-sufficient at a gradual pace to promote maintaining employment. By selecting the higher percentage of the stepped rent structure families will be placed at the higher schedule to promote growth and early rental payment responsibility. Spartanburg Housing may choose to review and update the size of the increase according to the most recent FMRs if it is determined that the rent increases are not large enough to maintain budget-neutrality

B. Alternative Rent Policy Description

The enrollment period for the alternative rent structure will begin after HUD approval and the alternate rent schedule will be implemented within one year. Once selected, Spartanburg Housing will complete the following tasks: finalize the rent policies, train staff, update software system, and any other needed items to fully implement the program. It is estimated that that completion of these tasks could take up to six to twelve months.

Eligible households will include resident/participants in both the public housing and HCV program, including existing, currently assisted households and new households admitted during

the alternate rent enrollment period. Households that are eligible to participant who meet the work requirement are residents/participants who are at least 18 years old, non-elderly and non-disabled whose only source of income is non-wages between the range of \$0-\$5,000.

Hardship Policy: The hardship policy will allow participants to request exemption from the step rent schedule for a period of 1 to 12 months based on review of the family circumstances. Spartanburg Housing will determine the duration of the hardship rent for each family, tailored to that family's circumstances. A household will receive a hardship if their rent burden exceeds 40% of their current/anticipated total annual gross income or for other circumstances as determined by the Spartanburg Housing. The hardship rent will equal 30% of the household's current/anticipated total annual gross income. The hardship can be renewed as needed.

C. Information Technology Plan

As a leading provider of software solutions to the PHA and Multi-Family industries, Yardi Systems will contribute to HUD's MTW Expansion Project efforts by providing an update to the current Spartanburg Housing modules. Yardi has been successfully providing MTW agencies with alternative rent and hardship solutions for several years. Their MTW clients include many of the nation's leading PHA's including Alaska Housing Partners, Boulder Housing Partners, Home Forward, San Bernardino Housing Authority, San Diego Housing Commission and San Mateo Housing Authority. Yardi is committed to the MTW Expansion project and have begun work to implement solutions for the Cohort 2 phase including Stepped Rents and Tiered Rents. As HUD has not yet clarified specifications for Cohort 2, they are unable to provide a definitive timeline for delivery of a Cohort 2 solution but have begun work on those pieces where clarity exists.

Appendix 1:

Moving to Work Certifications of Compliance

Certifications will be signed before plan submission.

Moving to Work Certifications of Compliance

CERTIFICATIONS OF COMPLIANCE

***U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING***

**Certifications of Compliance with HUD and Federal Requirements and Regulations:
Board Resolution to Accompany Application to the Moving to Work Demonstration Program**

Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the application to the Moving to Work (MTW) Demonstration Program for the PHA and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the application and implementation thereof:

- (1) The PHA will adhere to the MTW Operations Notice or successor notice and all requirements therein.
- (2) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure at least 75% of families assisted are very low-income as defined in Section 3(b)(2) of the 1937 Act throughout the PHA's participation in the MTW Demonstration Program.
- (3) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in establishing a reasonable rent policy that is designed to encourage employment and self-sufficiency.
- (4) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to assist substantially the same total number of eligible low-income families as would have been served absent MTW throughout the PHA's participation in the MTW Demonstration Program.
- (5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program throughout the PHA's participation in the MTW Demonstration Program.
- (6) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.
- (7) The PHA published a notice that a hearing would be held, that the application and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the application by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the application and invited public comment.
- (8) The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the application by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the application.

- (9) The PHA certifies that the Board of Commissioners 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).
- (10) The PHA certifies that it will carry out its application in conformity with: Title VI of the Civil Rights Act of 1964 (42 USC 2000d-2000d-4); the Fair Housing Act (42 USC 3601-19); Section 504 of the Rehabilitation Act of 1973 (29 USC 794); Title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.); all regulations implementing these authorities; other applicable Federal, State, and local civil rights laws; and that it 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.
- (11) The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2).
- (12) The application is consistent with the applicable Comprehensive Plan (or any plan incorporating such provisions of the Comprehensive Plan) for the jurisdiction in which the PHA is located.
- (13) The application certifies that according to the appropriate State or local officials that the application is consistent with the applicable Consolidated Plan, which incorporates a fair housing strategy that reflects the jurisdiction's AFH or Analysis of Impediments to Fair Housing Choice (AI), as applicable, and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
- (14) The PHA complies 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.
- (15) The PHA complies with the Violence Against Women Act and its implementing regulations at 24 C.F.R. Part 5, Subpart L and Parts 960 and 966.
- (16) The PHA complies with the Architectural Barriers Act of 1968 and its implementing regulations at 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (17) The PHA complies 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.
- (18) The PHA complies with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (19) The PHA complies 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 and implementing regulations at 49 CFR Part 24.
- (20) The PHA complies 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.
- (21) The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (22) The 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 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.
- (23) 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.
- (24) The PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.

- (25) The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (26) The PHA will comply with the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards at 2 CFR Part 200.
- (27) The application and all attachments are available at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

PHA NAME

PHA NUMBER/HA CODE

/we, the undersigned, certify under penalty of perjury that the information provided above, as well as any information provided in the accompaniment herewith, is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. § 3729, 3802).

NAME OF AUTHORIZED OFFICIAL *

TITLE

SIGNATURE

DATE

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

Appendix 2:

Public Process Documentation

*Public process documentation will be added before
plan submission.*

Appendix 3:

Required Standard Forms

1. Certification of Consistency with the Consolidated Plan (form HUD-2991)
2. Certification of Payments (form HUD-50071)
3. Disclosure of Lobbying Activities (SF-LLL)

Certifications will be signed before plan submission.

Appendix 4:

Other Supporting Documentation

Supporting documentation will be added before plan submission.