Explanatory Note to Public Reviewers of the Proposed Moving to Work Supplement Fillable Form

The Moving to Work (MTW) Supplement collects information about policies implemented by MTW expansion agencies. MTW agencies use it to communicate their plans with residents and community stakeholders through required public comment processes, and HUD uses the information collected to monitor and evaluate the MTW demonstration program. MTW agencies will submit the MTW Supplement to HUD annually, and amend as needed. HUD plans to make the MTW Supplement into a fillable form so as to reduce respondent burden and make the information collected more useful to HUD. When the MTW Supplement is available through the fillable form, it will include skip patterns¹ that prompt the user to populate only the sections relevant to what they are currently implementing. It will also include screening questions that will ask which waivers and associated activities they are currently implementing, plan to implement in the upcoming year, or will be discontinued in the submission year. The MTW Agency will be able to print the information from the MTW Supplement in a reader-friendly format in order to inform the public of its plans for the upcoming year. The purposes of the MTW Supplement are two-fold: it reports to HUD what is happening at the local level in a way that the Department can monitor and evaluate; and, more importantly, it informs the public about what the agency is planning and gives the public the ability to provide comment.

The MTW Supplement asks for information about each of the MTW Waivers and associated activities that are made possible by the MTW Operations Notice, Safe Harbor Waivers and Agency-Specific Waivers, and a few other types of information. MTW agencies will fill in information/data through a fillable form and the information collected will be stored in a database so that it can be analyzed by HUD. The approved forms will be posted to the MTW website for viewing by the public. For instance, it will be simple to find out how many MTW agencies and which MTW agencies are implementing each type of activity. It will also simplify reporting for the MTW agency since information will carry over year-to-year in the fillable form so that information that does not change from year to year will be pre-populated, thereby reducing respondent burden.

This document lists the sections of the MTW Supplement and then presents the proposed questions to be included in the MTW Supplement for MTW agencies to answer annually. Throughout the online version, there will be a dropdown menu option that makes it clear as to which activities an agency is permitted to do within the safe harbors of the MTW Operations Notice, Appendix I, MTW Waivers.

Sections of the MTW Supplement:

- A. PHA Information
- B. Narrative
- C. MTW Waivers and Associated MTW Activities
- D. Safe Harbor Waivers
- E. Agency-Specific Waivers
- F. Public Housing Operating Subsidy Grant Reporting
- G. MTW Statutory Requirements
- H. Public Comments
- I. Evaluations
- J. MTW Certifications of Compliance

Information to be Collected for MTW Activities

There are many MTW activities, subject to limitations as outlined in the MTW Operations Notice, that an MTW agency may implement. Each MTW agency will likely only engage in a subset of these MTW activities. The MTW Supplement will first ask MTW agencies to identify which MTW activities they are proposing to implement and which of those MTW activities they are already implementing. MTW agencies will subsequently be asked to provide information only about the MTW activities they are proposing to implement or are already implementing. This feature will reduce respondent burden. MTW waivers have associated MTW activities. MTW agencies are also able to combine MTW activities into their own initiatives.

MTW agencies will be asked for specific information about each MTW activity they are proposing to implement or are already implementing. There are six types of questions that could be asked about each MTW activity. The exact mix of questions will depend partly upon the MTW activity and partly upon the requirements for that MTW activity listed in the MTW Operations Notice. The six types of questions are:

- (1) Core—questions applicable to most MTW activities
- (2) Custom—questions specific to an individual MTW activity
- (3) Safe Harbor Waiver—questions asked when the MTW activity requires a Safe Harbor Waiver
- (4) Hardship Policy—questions asked when the MTW Operations Notice requires a hardship policy for the MTW activity
- (5) Impact Analysis—questions asked when the MTW Operations Notice requires an impact analysis for the MTW activity
- (6) Agency-Specific Waiver—questions asked when the MTW activity requires an Agency-Specific Waiver

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¹ A skip pattern is a question or series of questions associated with a conditional response.

Questions

The questions are presented below by type, beginning with the core questions. In the final online version of the MTW Supplement, the relevant questions from each type will be asked together in relation to each MTW activity the MTW agency is proposing to implement or is already implementing. The final online version of the MTW Supplement will be set up to allow for different versions of the same MTW activity—for instance, a different minimum rent for the non-elderly/non-disabled than for the elderly/disabled. The final online version of the MTW Supplement will also be able to autofill items with information from previous years. This feature will reduce respondent burden.

Table 1, at the end of this document, lists the MTW activities and indicates which types of questions need to be asked about each one.

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

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.
- 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: Vacaville Housing Authority PHA Code: CA125 MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): 07/01/2024 PHA Program Type: Public Housing (PH) only Housing Choice Voucher (HCV) only Combined MTW Cohort Number: 4 MTW Supplement Submission Type: Annual Submission Amended Annual Submission |
| В. | Narrative. |
| | MTW Supplement Narrative. The Vacaville Housing Authority (VHA) exists to serve our community's housing needs using all resources available. Participation in the Department of Housing and Urban Development's (HUD) Moving-to-Work (MTW) demonstration will provide VHA with the ability to make best use of existing program funds to assist the City of Vacaville's very low- and low-income residents to obtain safe, decent, and affordable housing. Participation in the MTW demonstration supports VHA's goal to provide affordable housing opportunities through creative partnerships with public and private collaborators. Participation in the MTW demonstration also expands VHA's ability to provide participants with opportunities to achieve self-sufficiency through the Family Self-Sufficiency Program. VHA will be able to utilize the benefits of the Moving-to-Work (MTW) program to meet the three statutory objectives of the MTW Demonstration Program in the following ways: •Cost Effectiveness – Reduce overall administrative costs by streamlining administrative activities associated with conducting annual recertifications and verification of participant assets. •Self-Sufficiency – Expand current partnerships and develop new public and private partnerships that will help families to move toward self-sufficiency. •Housing Choice - Increase housing choice for program participants by assigning project-based vouchers to shared housing units, increasing initial rent burden limits and creating a landlord incentive program that encourages owner participation in the Section 8 program. |

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

C. MTW Waivers and Associated Activities.

C.1 Tenant Rent Policies Not currently implemented

C.2 Payment Standards and Rent Reasonableness Not currently implemented

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. | VHA will conduct a reexamination once every three years (triennial) for all families in which at least 90% of income is from a fixed source. |
| 3.c., 3.d Self-Certification of Assets (PH & HCV) | Input options and instructions |

| 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. | \$ \$50,000 |

C.4 Landlord Leasing Incentives

| 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? | ✓ To all units [No follow-up questions] Certain types of units only [if checked, there are follow up questions]: What types of units does this policy apply to? Accessible units Units in particular types of areas or neighborhoods [if checked]: Please describe these areas briefly: [Text box] Units/landlords new to the HCV program Other [if checked]: Please describe briefly [Text box] |
| What is the maximum payment that can be made to a landlord under this policy? | \$2,500 |
| How many payments were issued under this policy in the most recently completed PHA fiscal year? | _0 [number of payments] |
| What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year? | \$ Not applicable. New Policy. |

C.5 Housing Quality Standards (HQS)

| •• | Expires: 03/31/2024 |
|--|---|
| 5.a Pre-Qualifying Unit Inspections (HCV) | Input options and instructions |
| How long is the pre-inspection valid for? | 90 [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 | Not currently implemented |
| landlord under this policy? How many penalty payments were charged under this policy in | Francis I Market Production |
| the most recently completed PHA fiscal year? | [number] Not applicable |
| 5.c Third-Party Requirement (HCV) | Input options and instructions |
| Please explain or upload a description of the quality assurance method. | Not currently implemented |
| 5.d Alternative Inspection Schedule (HCV) | Not currently implemented |
| C.7 Term-Limited Assistance Not Currently Implemen | nted |
| C.8 Increase Elderly Age Not currently implemented | |
| C.9 Project-Based Voucher Program Flexibilities (PBV) Not | currently implemented |
| C.10 Family Self-Sufficiency Program with MTW Flexibility | (Traditional) Not currently implemented |
| C.11 MTW Self-Sufficiency Program Not currently implement | nted |
| C.12 Work Requirement Not currently implemented | |
| C.13 Public Housing as an Incentive for Economic Progress A | Not currently implemented |

| C.14 | Moving On Policy Not currently implemented |
|------|--|
| C.15 | Acquisition without Prior HUD Approval Not currently implemented |
| | |
| C.16 | Deconcentration of Poverty in Public Housing Policy Not currently implemented |
| | |
| C.17 | Local, Non-Traditional (LNT) Activities Not currently implemented |
| | |
| D. | Safe Harbor Waivers. |
| D.1 | 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 |

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.

Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?

✓ No

Yes [If yes, upload required information in a-g above for each Safe Harbor Waiver request]

E. Agency-Specific Waivers.

E.1 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.

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.

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.

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. Not applicable. The VHA does not own Public Housing units.
- G. MTW Statutory Requirements. Not currently implemented

| G.2 | Establishing Reasonable Rent Policy. Not currently implemented |
|-----|---|
| G.3 | Substantially the Same (STS) – Local, Non-Traditional. Not currently implemented |
| G.4 | Comparable Mix (by Family Size) – Local, Non-Traditional. Not currently implemented |

G.5 Housing Quality Standards. Not currently implemented

a brief description of the focus of the evaluation.

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.

| H.1 | | Input options and instructions |
|--------|--|--|
| | | |
| Please | provide copy of all comments received by the public, | Upload Attachment |
| Reside | ent Advisory Board, and tenant associations. | See Exhibit A |
| | attach a narrative describing the MTW agency's analysis | Upload Attachment |
| of the | comments and any decisions made based on these | See Exhibit A |
| comm | ents. | |
| If app | licable, was an additional public hearing held for an | Yes |
| Agend | y-Specific Waiver and/or Safe Harbor waiver? | No |
| | | ✓ N/A |
| I | Evaluations. | |
| I.1 | Please list any ongoing and completed evaluations of the N | MTW agency's MTW policies, that the PHA is aware of, including |

| Question | Input options and instructions |
|---|--|
| Does the PHA have an agency-sponsored evaluation? | Yes/No [If Yes]: Please complete the table below. NO |

the information requested in the table below. In the box "title and short description," please write the title of the evaluation and

| 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 (DD/MM/YYYY), 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.

| Vacaville Housing Authority | 125 |
|--|---|
| MTW PHA NAME | MTW PHA NUMBER/HA CODE |
| I hereby certify that all the information stated herein, as well herewith, is true and accurate. Warning: HUD will prosecute criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; | false claims and statements. Conviction may result in |
| Emily Cantu | Executive Director |
| | |
| NAME OF AUTHORIZED OFFICIAL | TITLE |

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.