

PHA Name : Solano County

PHA Code : CA131

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

PHA Program Type: Housing Choice Voucher (HCV) only

MTW Cohort Number: 1

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Solano County Housing Authority (SCHA) 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 provides the SCHA with the ability to make the best use of existing program funds to assist the City of Dixon, City of Rio Vista, and the unincorporated areas of Solano County's very low- and low-income residents to obtain safe, decent, and affordable housing. Participation in the MTW demonstration supports the SCHA's goal to provide affordable housing opportunities through creative partnerships with public and private collaborators. Participation in the MTW demonstration also expands the SCHA's ability to provide participants with opportunities to achieve self-sufficiency. The SCHA is able to utilize the benefits of the Moving-to-Work (MTW) to meet the three statutory objectives of the MTW Demonstration Program in the following ways:

Cost-Effectiveness -

Reexaminations: SCHA is transitioned to require reexaminations every 36 months for families in which at least 90 percent of income is from a fixed source. The reexamination process can be cumbersome for persons who are elderly and/or disabled families that may have sight, hearing, cognitive, and/or mobility, etc. issues, or other families in which at least 90% of their income is from a fixed source. This burden can be removed as these families have few, if any, changes in household income and/or composition from year to year. Changing required reexaminations for these families from every 12 months to every 36 months will also reduce the administrative burden for the SCHA.

Self-Certification of Assets: The SCHA has increased the value of family assets and anticipated asset income, when applicable. The SCHA accepts the family's self-certification from \$5,000 or less to \$50,000 or less. All assets valued over \$50,000 will continue to require 3rd party verification.

Self-Sufficiency -

Funding flexibility and streamlining administrative processes allow the SCHA to expand resources and staff assistance provided to program participants during the housing search process. Activities may include expanded briefing topics/activities such as warm referrals to rental and/or utility deposit assistance, developing a rental profile, practicing completing rental applications, and/or reviewing credit/rental history.

Housing Choice -

Tenant Rent Policies: The SCHA increased the 40 percent affordability cap to 50 percent at initial lease-up in order to increase housing choice for low-income households. This has increased low-income families' ability to secure housing in low-poverty concentration and areas of opportunity.

Landlord Leasing Incentives: By combining the activities available under the Landlord Leasing Incentives category, the SCHA had planned to launch its Landlord Partnership Program (LPP) in Fiscal year 2022-2023. Due to staffing challenges involving limited capacity, the SCHA was unable to implement as planned. The SCHA plans on implementing in March 2024. The LPP is aimed at expanding rental opportunities for families holding housing choice vouchers by making landlord participation in the program more attractive. The LPP provides financial incentives to landlords who rent to housing choice voucher participants in the form of vacancy payments, damage claims funds, and additional lease-up incentives to landlords with new units. **Housing Quality Standards:** In conjunction with the LPP, the SCHA will conduct pre-qualifying unit inspections for landlords that are willing to participate in the program but have not yet identified an eligible tenant. Conducting pre-qualifying inspections supports the recruitment of new landlords and units as well as retaining existing units within the portfolio of available housing. The SCHA was unable to implement as planned in Fiscal year 2022-2023 due to limited staff capacity and plans to implement in March 2024.

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	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Currently Implementing
q. Imputed Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
u. Standard Deductions (HCV)	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)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Will implement March 2024
b. Damage Claims (HCV-Tenant-based Assistance)	Will implement March 2024
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Will implement March 2024
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	
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
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)	Currently Implementing
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.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented

d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	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)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

C. MTW Activities Plan that Solano County Plans to Implement in the Submission Year or Is Currently Implementing

1.o. - Initial Rent Burden (HCV)
In October 2022, the Solano County Housing Authority (SCHA) increased the 40 percent affordability cap to 50 percent at initial lease-up in order to increase housing choice for low-income households. SCHA anticipates that this will increase low-income families' ability to secure housing in low-poverty concentration and areas of opportunity.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
During the last fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. SCHA data analysis confirms that 6% of participants (14 total) were able to locate housing by utilizing the increased initial rent burden from 40% to 50%.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Solano County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Maximum income-based rent percentage 50.00%

3.b. - Alternative Reexamination Schedule for Households (HCV)
In November 2022, the SCHA transitioned to conducting reexaminations at least every 36 months for families in which at least 90 percent of income is from a fixed source. The reexamination process can be cumbersome for persons who are elderly and/or disabled families that may have sight, hearing, cognitive, and/or mobility, etc. issues, or other families in which at least 90% of their income is from a fixed source. This burden can be

removed as these families have few, if any, changes in household income and/or composition from year to year. Changing required reexaminations for these families from every 12 months to every 36 months will reduce the administrative burden for the SCHA.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
During the last fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. SCHA data analysis confirms that annuals for 33% of participants (80 total) were moved to triennials.
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Solano County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Recertification Schedule is Once every three years
Household may request 2 or more interim recertifications per year.
Households will be able to submit interim recertification requests to the Housing Authority between annual reexaminations.

3.d. - Self-Certification of Assets (HCV)
In October 2022, the Solano County Housing Authority (SCHA) increased the value of family assets and anticipated asset income, when applicable. The SCHA accepts the family's self-certification of income from assets of \$50,000 or less. All assets valued over \$50,000 will continue to require third-party verification.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
During the last fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. A total 2 % (4 participants) had assets over \$50,000
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Solano County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The dollar threshold for the self-certification of assets is \$50,000.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)
Originally planned to implement in October 2022, The Solano County Housing Authority (SCHA) planned on launching its Landlord Participation Program (LPP) Fiscal Year 2023-2024. Due to staff shortage, SCHA was unable to implement has planned. SCHA plans to implement March 2024. This includes vacancy loss payments to incentivize a landlord's continued participation in the HCV program. The SCHA will make additional payments to the landlord for SCHA related lease-up delays to encourage landlord continued participation.

This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
During the last fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA consulted with HUD and other MTW agencies to develop its Landlord Participation Program. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. As the activity has not been implemented yet, the SCHA does not yet have the data on how the changes have impacted program participants.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Solano County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to To all units
The types of units policy applies to:
Maximum payment to the landlord is \$ Payments to the Landlord would not exceed the equivalent of one months contract rent.
0 payments were issued under this policy in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

4.b. - Damage Claims (HCV-Tenant-based Assistance)
Originally planned to implement October 2022, and postponed to attempt implementation in Fiscal Year 2023-2024, the Solano County Housing Authority (SCHA) planned on launching its Landlord Participation Program (LPP) to incentivize a landlord's continued participation in the HCV program. Due to staff shortage, SCHA was unable to implement. SCHA plans on implementing March 2024. If a current tenant leaves damages to a unit beyond normal wear and tear, the SCHA may process a damage claim to the landlord.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
During the last fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA consulted with HUD and other MTW agencies to develop its Landlord Participation Program. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. As the activity has not been implemented yet, the SCHA does not yet have the data on how the changes have impacted program participants.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Solano County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to To all units
The types of units policy applies to:
Maximum payment to the landlord is \$The amount of damage claims must not exceed the lesser of the cost of repairs or two months of contract rent.
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)
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The Solano County Housing Authority (SCHA) plans on launching its Landlord Participation Program (LPP) March 2024 to incentivize new landlords to join the HCV program. Implementation was delayed due to staffing changes and limited staff capacity. The SCHA will provide lease-up incentive payments to landlords that place units that have not been assisted in the previous 12 months on the program.

This MTW activity serves the following statutory objectives:
Housing choice

This MTW activity serves the following statutory objectives:
Increased expenditures

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

During the last fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA consulted with HUD and other local MTW agencies on current best practices for landlord incentive programs. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. As the activity has not yet been implemented, the SCHA does not yet have the data on how the changes have impacted program participants. Implementation was delayed due to staffing changes and limited staff capacity.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Solano County MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

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

The types of units policy applies to:

Maximum payment to the landlord is \$Payments to the landlord must be equal to no more than one month of the contract rent..

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

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

5.a. - Pre-Qualifying Unit Inspections (HCV)

Originally planned to implement in October 2022 and postponed to Fiscal Year 2023-24, the Solano County Housing Authority (SCHA) plans on offering in March 2024, pre-qualifying unit inspections (also known as a pre-inspection) on vacant units that are ready for occupancy, by request. Implementation was delayed due to staffing changes and limited staff capacity.

This MTW activity serves the following statutory objectives:
Housing choice

This MTW activity serves the following statutory objectives:
Neutral (no cost implications)

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

During the last fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. As the activity has not yet been implemented, the SCHA does not yet have the data on how the changes have impacted program participants.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Solano County MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

The pre-inspection is valid for 90 days.

9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)

In July 2022, the SCHA implemented its Project-Based Voucher (PBV) program which included allowing shared housing as a housing type eligible under the PBV program. Allowing shared housing as an eligible PBV housing type will increase housing options for homeless Veterans in the SCHA jurisdiction.

<p>This MTW activity serves the following statutory objectives: Housing choice</p>
<p>This MTW activity serves the following statutory objectives: Increased expenditures</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households</p>
<p>During the last fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. As the activity was implemented within the final quarter of the program year, the SCHA does not yet have the data on how the changes have impacted program participants.</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Solano County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.</p>
<p>The MTW agency anticipates 0 number of shared housing units in the fiscal year.</p>
<p>The MTW agency assisted 6 number of shared housing units in the most recently completed PHA fiscal year.</p>
<p>The MTW agency anticipates 0 number of manufactured housing units in the fiscal year.</p>
<p>The MTW agency assisted 0 number of manufactured housing units in the most recently completed PHA fiscal year.</p>

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

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

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	0

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

G.2	Establishing Reasonable Rent Policy.

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	# of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	# of unit months

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	
	Occupied Number of Local, Non-Traditional units by

Family Size:	Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

H.	Public Comment
Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.	

I.	Evaluations.

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 (), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

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).

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

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