

## **PUBLIC HEARING NOTICE**

### **SIGNIFICANT AMENDMENT TO HOUSING CONNECT'S PUBLIC HOUSING AGENCY (PHA) 2022-2023 ANNUAL PLAN**

**PUBLIC HEARING – MONDAY, JANUARY 9, 2023, AT 10:00 A.M.  
(VIRTUAL)**

An amendment to the Mixed Finance, Modernization or Development section of Housing Connect's 2022-2023 Public Housing Agency (PHA) plan will be made.

A draft of the significant amendment to Housing Connect's PHA Plan for 2022-2023 is provided on Page 3 of this document, along with the rest of the Plan which was approved by HUD on October 4, 2022, and is now available for review and public comment. The draft may also be reviewed during normal business hours at the Housing Connect main office, 3595 South Main Street, Salt Lake City, Utah 84115.

A public hearing for the significant amendment to the 2022-2023 PHA Annual Plan will be held on Monday, January 9, 2023, at 10:00 a.m. All comments must be submitted by 3:00 p.m. on Thursday, January 5, 2023 via e-mail to [janice@housingconnect.org](mailto:janice@housingconnect.org) or in writing to:

Janice Kimball, Chief Executive Officer  
Housing Connect  
3595 S. Main Street  
Salt Lake City, Utah 84115

Due to health concerns, the public hearing will be held virtually. Please find below information for accessing the meeting:

Topic: Public Hearing - Significant Amendment to Housing Connect's 2022-2023 PHA Plan  
Time: Jan 9, 2023 10:00 AM Mountain Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/85128845330?pwd=WXpROFRFCNEwyU25waE9uTHNGZVU0Zz09>

Meeting ID: 851 2884 5330

Passcode: 203933

One tap mobile

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+17193594580,,85128845330#,,,\*203933# US

Dial by your location

+1 669 900 9128 US (San Jose)

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+1 346 248 7799 US (Houston)

+1 669 444 9171 US

+1 689 278 1000 US

+1 301 715 8592 US (Washington DC)

+1 305 224 1968 US

+1 309 205 3325 US

+1 312 626 6799 US (Chicago)

+1 360 209 5623 US

+1 386 347 5053 US

+1 507 473 4847 US  
+1 564 217 2000 US  
+1 646 558 8656 US (New York)  
+1 646 931 3860 US

Meeting ID: 851 2884 5330  
Passcode: 203933

Find your local number: <https://us02web.zoom.us/j/85128845330>

Contact Janice Kimball at (801) 284-4423 for further information.

November 21, 2022

**SIGNIFICANT AMENDMENT:**

The following amendment will be made to Housing Connect's 2022-2023 Public Housing Agency (PHA) Annual Plan **(this is an amendment to the Mixed Finance, Modernization or Development section of 2022-2023 PHA Plan for Housing Connect)**:

Housing Connect intends to use funds for the disposition of Granger UT003000004E through the HUD Section 18 demolition/disposition due to the high level of capital needs. Housing Connect has received 9% LIHTC and will significantly rehab the property. No clients will be displaced.

Housing Connect will apply for tenant protection vouchers. Granger apartments are 24 units of family public housing located in West Valley City.

# U. S. Department of Housing and Urban Development

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Office of Public Housing

Region VIII, Denver  
1670 Broadway Street  
Denver, Colorado 80202-4801

Phone: 303-672-5372  
Fax: 303-672-5065  
Web: [www.hud.gov](http://www.hud.gov)

October 4, 2022

## **VIA Electronic Mail**

Ms. Janice Kimball  
Executive Director  
Housing Connect  
3595 South Main Street  
Salt Lake City, UT 84115  
[jjkimball@hacsl.org](mailto:jjkimball@hacsl.org)

Re: PHA Plan Significant Amendment Approval

Dear Ms. Kimball:

This letter is to inform you that the Housing Connect's (HC) Annual PHA Plan Significant Amendment for the Fiscal Year 7/01/2022 – 6/30/2023 is approved. The Plan approved is version two. This approval of the Plan submission does not constitute an endorsement of the strategies and policies outlined in the Plan. In providing assistance to families under programs covered by this Plan, HC will comply with the rules, standards, and policies established in its approved PHA Plan, as provided in 24 CFR Part 903 and other applicable regulations.

HC's Plan and all required attachments and documents must be made available for review and inspection at the PHA office during normal business hours.

Should you have any questions or if we may be of further assistance, please contact Bob Koenen, Portfolio Management Specialist, at [bob.e.koenen@hud.gov](mailto:bob.e.koenen@hud.gov) or 303-672-5238.

Sincerely,

10/4/2022

X

A handwritten signature in blue ink, appearing to read "C. Smith", is written over a horizontal line.

Christine Smith Dreier  
Division Director  
Signed by: CHRISTINE SMITH-DREIER





## RESOLUTION #1068

### SIGNIFICANT AMENDMENT TO THE 2022-2023 ANNUAL PUBLIC HOUSING AGENCY (PHA) PLAN

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WHEREAS, the Housing Connect Board of Commissioners approved the 2022-2023 annual agency Public Housing Agency (PHA) plan ("the Annual Plan") on March 16, 2022, as well as the Moving To Work (MTW) Supplement on May 18, 2022;

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) has informed Housing Connect that it needs to amend the Annual Plan to include the MTW Supplement as a "Significant Amendment" to the Annual Plan;

WHEREAS, the inclusion of a Significant Amendment into the Annual Plan requires a full 45-day review process (which includes posting a notice and a review period; a public hearing; approval of the Significant Amendment by Housing Connect's Resident Advisory Board and the Board of Commissioners); and

WHEREAS, a public hearing (after a notice had been posted and the public had been given an opportunity to review the Significant Amendment) was held on Thursday, September 8, 2022, in order to obtain public comments, and the Resident Advisory Board approved the 2022-2023 the Significant Amend at its September 14, 2022 meeting;

NOW, THEREFORE, Be It Resolved by the Commissioners of Housing Connect as follows:

Section 1. That the Significant Amendment to the Housing Connect 2022-2023 Annual PHA Plan be approved;

Section 2. That this resolution become effective immediately.

Dated this 21<sup>st</sup> day of September, 2022.

DocuSigned by:

*Spencer Moffat*

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Spencer Moffat, Chair

DocuSigned by:

*Andre Bartlome*

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Andre Bartlome, Board Treasurer



The Mission of the RAB is to represent the interests of the residents receiving rent assistance from Housing Connect. The goal is to assist Housing Connect staff and Board of Commissioners to maintain and improve the quality of life for all residents.

The Mission of Housing Connect is to provide and develop quality affordable housing opportunities for individuals and families while promoting self-sufficiency, empowerment, and neighborhood revitalization.



**Housing Connect  
Resident Advisory Board  
Meeting Minutes  
September 14, 2022**

Board Members Present:

Mary Ann Ericksen - Chair  
Kathy Larsen - Vice Chair  
Jamie Ramos - Treasurer  
Gwen White  
Carl Schettler  
Royal Miller

Board Members Not Present:

Fotu Taeoalli

Housing Connect Staff Present:

Braidee Kolendrianos  
Janice Kimball  
Marni Timmerman  
Ilez Brady

Welcome

Mary Ann welcomed RAB Members and Housing Connect Staff.

Reading of the RAB Mission

Jamie read the Resident Advisory Board Mission.

Minutes Review

Mary Ann referenced the minutes from the May 2022 RAB meeting and asked for any comments, questions, or changes. Royal motioned to approve the minutes, Jamie seconded the motion. Board approval was unanimous.

Housing Connect Update



Ilez reviewed the summary of the updates to the Housing Choice Voucher Administrative Plan. She asked RAB members for any questions regarding the updates. There were no questions.

Marni reviewed the summary of changes regarding the Moving To Work waivers to the ADMIN & ACOP Plans. She asked RAB members for any questions regarding the updates. There were no questions.

Jamie motioned to approve the HCV Administrative Plan changes and Royal seconded the motion. Board approval was unanimous.

Royal motioned to approve the ACOP Plan changes and Carl seconded the motion Board approval was unanimous.

#### Budget Review

Jamie reviewed the RAB budget up to date for FY2023. Jamie asked for any questions from the RAB, there were no questions. Royal motioned to approve the budget, Mary Ann seconded the motion. Approval was unanimous.

#### Moving To Work

Marni reviewed the Significant Amendment to the FY 22-23 Annual Plan regarding the Moving to Work Supplement. Marni asked for any questions from the RAB, there were no questions. Carl motioned to approve the Significant Amendment. Royal seconded the motion. Approval was unanimous.

#### BOC Report

Gwen reported that the BOC discussed the construction has begun at New City Plaza as well as the application for LITCH was approved for Granger Apartments in West Valley City. The BOC approved Public Housing and Housing Choice Voucher write offs.

Gwen will report to the BOC the RAB approved the updates to the HCV Admin Plan and ACOP Plan as well as the Supplement to the Annual Plan for FY22-23. Gwen will also report the RAB added a new member, Fotu Taeoalli, a representative of the Hub of Opportunity.

#### Property Reports

Kathy and Gwen reported issues with a resident's AC unit at Kelly Benson, Braidee will pass the message along to Property Management and the Regional Property Manager. Carl reported that some tenants are complaining about the construction at New City Plaza, but staff is doing a good job at navigating the concerns. He also suggested staff of Housing Connect / Kier Construction consider exploring solutions for the issues with TV broadcasting in NCP.

Royal reported Bodhi only has one working elevator due to a delay in getting parts.

#### Other

The RAB discussed inviting the BOC members to the November RAB meeting. Braidee will connect with Mary Ann to discuss preparing the highlights of the year.

#### Next Meeting



The next meeting will be on Wednesday, November 9, 2022. Royal motioned to adjourn, Jamie seconded the motion.





**MINUTES OF THE PUBLIC HEARING  
FOR THE SIGNIFICANT AMENDMENT  
TO HOUSING CONNECT'S ANNUAL PHA PLAN  
(JULY 1, 2022 – JUNE 30, 2023)**

**Thursday, September 8, 2022, 9:00 a.m.**

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**HOUSING CONNECT:**

Janice Kimball – Chief Executive Officer  
Marni Timmerman – Moving To Work Director  
Dan Pincock – Executive Administrator

**PUBLIC:**

(none)

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The Public Hearing for Significant Amendment to Housing Connect's Annual PHA Plan for 2022-2023 commenced at 9:00 a.m. on Thursday, September 8, 2022. The hearing was held in person at the Housing Connect (main office) Board Room, and it was held virtually, as well.

Housing Connect Chief Executive Officer Janice Kimball, Moving To Work Director Marni Timmerman, and Executive Administrator Dan Pincock were in attendance.

No members of the public attended the hearing. Housing Connect did not receive any written or other comments about the Significant Amendment from the public.

Respectfully submitted,

Dan Pincock  
Executive Administrator



# Housing Connect



## Annual PHA Plan

July 1, 2022—June 30, 2023

# Executive Summary

## Housing Connect

July 1, 2022—June 30, 2023

Housing Connect's Annual Plan sets goals and objectives that work towards fulfilling our mission and improving the lives of the people we serve. This comprehensive approach is consistent with and supports:

- Department of Housing and Urban Development's (HUD) Home, Together: The Federal Strategic Plan to Prevent and End Homelessness.
- HUD's System Performance Measures.
- Salt Lake Valley Coalition to End Homelessness efforts.
- The State of Utah's Strategic Plan on Homelessness.
- Salt Lake County's The Future We Choose: A Partnership for greater Salt Lake.

### Agency Overview

The Salt Lake County Commissioners formed the Housing Authority of the County of Salt Lake (doing business as Housing Connect) in 1970. We are a tax-exempt, municipal corporation, governed by a seven-member Board nominated by the Salt Lake County Mayor and confirmed by the County Council. Board members serve a four-year term with an option for a reappointment. Our funding comes primarily from rents we collect and subsidies from the federal government.

### Housing Connect Board of Commissioners

**Spencer Moffat, Chair**

**Phil Bernal, Vice Chair**

**Kat Johnson**

**Wendy Leonelli**

**Erin Litvack**

**Christine Nguyen**

**Gwen White**

**Boyer Corp.**

**(ret.) Higher Education Administrator**

**Community Solutions**

**Zions Bank Corporation**

**Salt Lake County Government**

**State of Utah**

**Resident Advisory Board**

Housing Connect's annual revenue exceeds \$50 million. Housing Connect staff includes 130 employees, with an average job longevity of 4.9 years.

Our mission is to connect people and communities to quality affordable housing opportunities while promoting self-sufficiency and neighborhood revitalization. The health and wellbeing of our residents and neighborhoods are at the core of our work. Our staff and programs are grounded in these fundamental beliefs and values:

- We believe that housing is a basic right and a foundation for success in life. We all benefit when our citizens have a safe place to call home.
- While housing is a foundation, it is not enough to simply have a roof over one's head. We provide our residents with excellent programs for their individual growth and welfare.
- We create communities that are safe and peaceful. Our residents are part of their neighborhood and society as a whole. We are proud of the communities we help create and the housing we build and manage.



- We believe that people should be able to choose the housing that best meets their individual needs, and that those needs evolve and change. We work hard to appreciate and support our residents throughout the evolution of their life circumstances.
- We deserve the public's support and confidence for the resources they entrust in our agency. We understand that resources are finite and that our programs and services must be energy efficient, sustainable, and economically viable.
- We respect and celebrate the whole person, whether resident or employee. Our work culture responds to individual needs and the benefit of the whole. We are fair. We listen to everyone associated with our efforts.

Housing Connect is an award-winning agency with numerous recognitions from the National Association of Housing and Redevelopment Officials (NAHRO), the Department of Housing and Urban Development, and others. Since the inception in 1990 of the performance measurements by HUD's Public Housing Assessment System (PHAS and SEMAP), Housing Connect has received High Performer status for over 25 years.

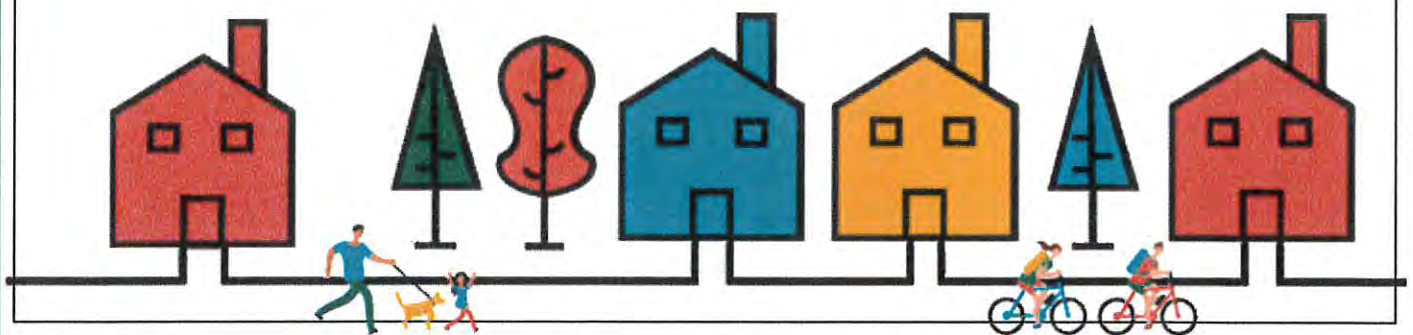
Housing Connect is a service oriented housing authority that assists low income individuals, families, elderly, and individuals with physical or mental disabilities. Housing Connect has constructed or acquired 416 public housing units serving over 1,300 individuals and families in Salt Lake County. Housing Connect additionally owns and operates 597 Tax Credit Properties serving special needs populations that face many barriers to housing such as being formerly homeless, older adults with disabilities and individuals with refugee status.

Housing Connect also provides housing assistance to 3,028 households through the Section 8 Housing Choice Voucher program and 689 additional households through other rental assistance programs for a total of 3,717 households. These programs serve low income and special needs populations including Veterans, persons living with HIV/AIDS, youth aging out of foster care, non-elderly disabled, formerly homeless, and individuals with refugee status.

Housing Connect has adopted the Social Determinants of Health as a core framework to focus current and future activities, initiatives, and housing development efforts. The agency's six priority determinants are: Housing Stability, Financial Health, Food Quality & Stability, Education Connection, Health Access & Connection, and Community Connection. Collectively, the priority determinants identify the holistic impact Housing Connect seeks to make for those served.

#### **2020-2025 Agency Goals:**

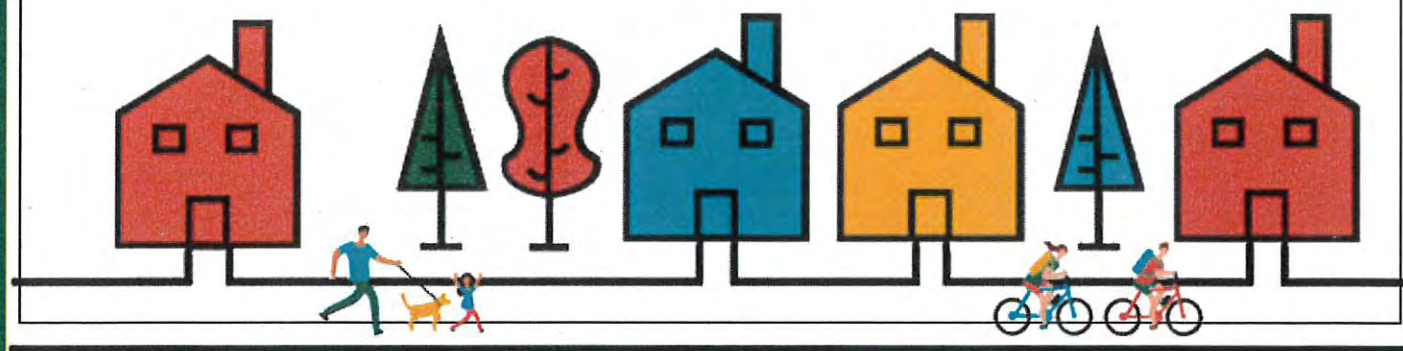
- Maintain high performer status with HUD subsidized Housing Programs
- Increase Affordable Housing physical units by 350
- Increase Affordable Rental Subsidies by 300 units





- Diversify funding
- Reposition and secure long-term viability of Public Housing properties
- Enhance and grow supportive services that maintain housing assistance and promote well-being

In May 2021, Housing Connect was selected for Moving to Work (MTW) status. The MTW demonstration program will provide Housing Connect with the unique opportunity to design and test innovative, locally designed housing and self-sufficiency strategies for low-income families. Housing Connect is pleased to be an industry leader and in the elite group of housing authorities in the nation. We are excited to implement policies that will address local need and increase cost effectiveness, self-sufficiency, and housing choice.

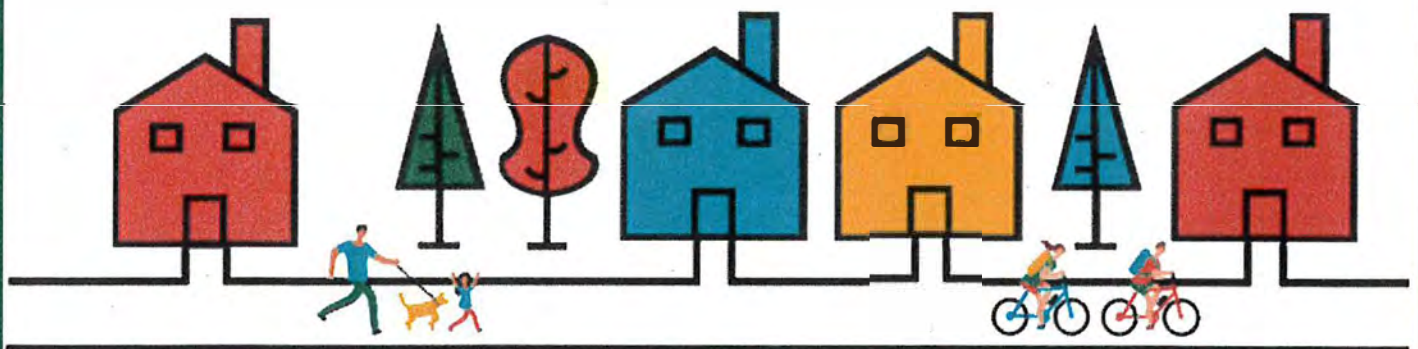


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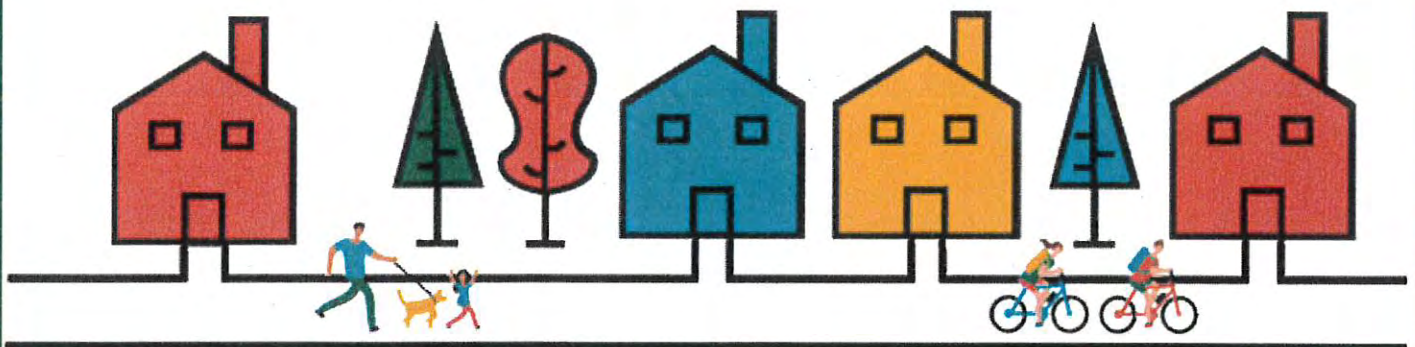
July 1, 2022—June 30, 2023

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Housing Connect UT003 FORM HUD-50075-HP



# 5-Year and Annual PHA Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

OMB No. 2577-0226  
Expires  
XX/XX/XXXX

**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

**Applicability.** Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

## Definitions.

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

<b>A.</b>	<b>PHA Information.</b>																										
A.1	<p>PHA Name: <u>Housing Connect</u> PHA Code: <u>UT003</u></p> <p>PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performer</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>July 1, 2021</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>381</u> Number of Housing Choice Vouchers (HCVs) <u>2797</u></p> <p>Total Combined <u>3,178</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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		PH	HCV																								
Lead PHA:																											
<b>B.</b>	<b>Annual Plan Elements</b>																										



# 5-Year and Annual PHA Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

OMB No. 2577-0226  
Expires  
XX/XX/XXXX

## B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA Plan** submission?

Y N

- ☒ ☐ Statement of Housing Needs and Strategy for Addressing Housing Needs.
- ☒ ☐ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- ☒ ☐ Financial Resources.
- ☐ ☒ Rent Determination.
- ☐ ☒ Homeownership Programs.
- ☒ ☐ Safety and Crime Prevention.
- ☐ ☒ Pet Policy.
- ☐ ☒ Substantial Deviation.
- ☐ ☒ Significant Amendment/Modification.

(b) The PHA must submit its Deconcentration Policy for Field Office Review.

(c) If the PHA answered yes for any element, describe the revisions for each element below:

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA's public housing and Section 8 tenant-based assistance waiting lists. [24 CFR §903.7\(a\)\(1\)](#) and [24 CFR §903.12\(b\)](#). Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA's public housing and Section 8 tenant-based assistance waiting lists. [24 CFR §903.7\(a\)\(2\)\(ii\)](#) and [24 CFR §903.12\(b\)](#).

See Attachment 1

**Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions.** Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to [24 CFR §903.2\(b\)\(2\)](#) for developments not subject to deconcentration of poverty and income mixing requirements. [24 CFR §903.7\(b\)](#) Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. [24 CFR §903.7\(b\)](#) A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. [24 CFR §903.7\(b\)](#) Describe the unit assignment policies for public housing. [24 CFR §903.7\(b\)](#)

See Public Housing Admissions and Continued Occupancy at [www.housingconnect.org](http://www.housingconnect.org) for the Deconcentration Policy (chapter 4.) Regarding eligibility, selection, admission and unit assignment please see chapters 3, 4 & 5.

Tenant selection for Public Housing is based on income and date and time of the application. Housing Connect maintains site-based waiting lists for Public Housing County High Rise and Valley Fair Village. No changes to family sites are being considered at this time. Public Housing will offer a preference to families who are seeking to transfer from Housing Connect's Housing Choice Voucher Program, Project Based Voucher Program or other covered housing program operated by the PHA for displacement by:

**5-Year and Annual  
PHA Plan**

**U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing**

**OMB No. 2577-0226  
Expires  
XX/XX/XXXX**

Domestic violence, dating violence, sexual assault or stalking under VAWA – to verify qualification for this preference Housing Connect will follow documentation requirements as outlined in the ACOP section 16-VII.D.

Hate crimes - to verify qualification for this preference Housing Connect will require certification by a law enforcement agency or other reliable information.

Inaccessibility of a unit and/or to accommodate a disability under a request for reasonable accommodation - to verify qualification for this preference Housing Connect will require certification by a healthcare professional.

Relocation - a relocation preference will be extended to individuals who reside in units owned by Housing Connect are subject to relocation for demolition, disposition, or extensive rehab.

Housing Connect's Board of Commissioners may invoke a preference for families displaced by a Gubernatorial or Presidentially declared disaster under terms and for a duration chosen by the Board when such preference is invoked.

Tenant selection for the Section 8 Tenant-Based Rental Assistance is based on income and the date and time of application. A separate waiting list is maintained for each property receiving Project-Based Vouchers.

Housing Connect's Housing Choice Voucher program has established an annual move-on preference for up to 30 households that are on a permanent supportive housing program. These vouchers are intended for households that need ongoing rental assistance, but no longer need intensive supportive services to maintain their housing stability.

Regarding eligibility, selection and admissions, see Chapters 3, 4 and 5; a separate waiting list is maintained for each property receiving project-based vouchers. The Project Based Voucher waiting lists each have specific preferences that include limiting preference to individuals referred by partnering organizations. These are outlined in the Section 8 Administrative plan, Chapter 17. A waitlist preference will be extended to individuals who reside in units owned by Housing Connect are subject to relocation for demolition, disposition, or extensive rehab. In regards to the RAD PBV conversion of the Highrise, a preference will be given for elderly families with the exception of ADA/504 units which will have an elderly/non-elderly disabled selection preference.

The waiting list for Section 8 has been closed since March 31, 2021. The waiting list for Public Housing opened April 10, 2017 and remains open at this time. The waiting list for Valley Fair Village opened effective July 20, 2015 and remains open at this time. The waiting list for the County High Rise closed October 30, 2020.

**Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903 7(c))

# 5-Year and Annual PHA Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

OMB No. 2577-0226  
Expires  
XX/XX/XXXX

Source	Amount	Planned Use
Public Housing Operating Fund	1,526,305	General Operations PH
Public Housing Capital Fund	490,327	See CDF plan
Housing Choice Voucher Assistance	28,148,782	Rental Assistance
Resident Opportunity & Self Sufficiency	312,635	Family Self-Sufficiency/ROSS Public Housing
HOME/State/County Funding	6,415,763	Rental Assistance
HOPWA	575,617	Rental Assistance
Continuum of Care	4,114,726	Rental Assistance
Temporary Assistance for Needy Families	307,478	Parent Education
Public Housing Dwelling Rent	1,184,414	General Operations PH
Management Income	287,473	General Administrative Operations
Other Dwelling Rent	2,522,517	Operations and Non-Subsidized Units
HCV Fraud Recovery	90,862	HCV Administrative Operations
Interest Income	64,112	General Administrative Operations
Other Revenue	4,291,790	General Administrative Operations
<b>TOTAL:</b>	<b>50,332,801</b>	

**Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

Housing Connect has been awarded a Moving to Work (MTW) PHA under Expansion Cohort 2 and will be participating in a rent reform study with HUD with an anticipated start date of **October 2022**. All details of the rent study including rent determination will be outlined and approved by HUD in our MTW Supplement to this plan. Any changes to rent determination would then be reflected in updated versions of our ACOP &



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**Admin Plans.** Until then, see Public Housing Admissions and Continued Occupancy Policies (ACOP) on Rent Determination. No changes in how rents are determined. For HCV, please see the Section 8 Administrative Plan (Admin), Chapter 6, Income and Subsidy Determinations. No changes in how rents are determined.

**Homeownership Programs.** A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. ([24 CFR §903.7\(k\)](#) and 24 CFR §903.12(b)).

Housing Connect's Resident Services Department offers programs to housing authority residents that encourage and promote self-sufficiency and upward mobility. The programs, Family Self-Sufficiency Program (FSS), and ROSS Service Coordinator Program provide opportunities for employment counseling, home-ownership counseling and opportunities to become self-sufficient.

Housing Connect does have policies in place to operate the homeownership option to assist a family residing in a home purchased and owned by one or more members of the family in conjunction with the HCV program but have not implemented it at this time.

**Safety and Crime Prevention (VAWA).** A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. ([24 CFR §903.7\(m\)\(5\)](#))

Housing Connect provides a comprehensive array of services. We have a contract with the Unified Police Department of Greater Salt Lake to provide additional on-site Community Policing at our Public Housing Communities. We also have a contract with the West Valley Police Department to provide services at Valley Fair Village.

Housing Connect ensures that all Public Housing residents, Section 8 Housing Choice Voucher program residents and Landlords, and other housing program residents are notified about their rights and of their obligation under VAWA. We offer many choices regarding housing options such as moving, removal of the perpetrator and providing referrals to an outside agency that can offer help to the families. It is our policy to maintain the highest standard of confidentiality while making every opportunity available to victims so that they may feel safe and maintain housing.

**Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. ([24 CFR §903.7\(n\)](#))

See Public Housing Admissions and Continued Occupancy Policies at [www.housingconnect.org](http://www.housingconnect.org).

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

Housing Connect defines significant amendment or deviation/ modification to the Annual Plan as any change or additional provision adopted by Housing Connect that may impact the final outcome identified in the Annual Plan.

Also the Substantial Deviation definition of the PHA Plan will exclude the following Items:

- A. Changes to the Capital Fund Budget produced as a result of each approved RAD or Disposition Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;



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- B. Changes to the construction and rehabilitation plan for each approved RAD conversion;
- C. Changes to the financing structure for each approved RAD or Disposition conversion;
- D. Changes to the Relocation Plan and processes for each approved RAD or Disposition conversion.
- E. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance

**Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define 'significant amendment/modification', HUD will consider the following to be 'significant amendments or modifications': a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency public housing CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan); or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: [Notice PIH 1999-51 \(24 CFR §903.7\(r\)\(2\)\(i\)\)](#)

Housing Connect defines a significant amendment or deviation/ modification to the Annual Plan as any change or additional provision adopted by Housing Connect that may impact the final outcome identified in the Annual Plan.

## B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y N

- ☒ Hope VI or Choice Neighborhoods.
- ☒ Mixed Finance Modernization or Development.
- ☒ Demolition and/or Disposition.
- ☒ Conversion of Public Housing to Tenant Based Assistance.
- ☒ Conversion of Public Housing to Project-Based Assistance under RAD.
- ☒ Project Based Vouchers.
- ☒ Units with Approved Vacancies for Modernization.
- ☐ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.

### B.2 New Activities:

**Hope VI.** 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

N/A

**Mixed Finance Modernization or Development.** 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)



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<p>UT003000004-F-Hunter Hollow, which was recently converted through RAD, underwent a major renovation. It achieved substantial completion in late calendar year 2021.</p> <p>The remaining units within our project sites (UT003000002A-Valley Fair Village, UT003000003-Harmony Park, Union Plaza and Erin Meadows and UT003000004E-Granger are expected to be modernized as needed. Some of the modernization is anticipated to address ADA accessibility. UT003000003-B Sunset Gardens, which recently was awarded an allocation of 9% Low Income Housing Tax Credits and we have submitted a Section 18 Demolition/Disposition application. UT003000001-High Rise has been awarded 4% tax credits and will convert through RAD/Section 18 blend. Major renovations are anticipated to commence in early 2022, with work continuing into 2024.</p> <p>Housing Connect will use financing sources when available to supplement our modernization activities. Housing Connect continues to explore funding opportunities for its existing Public Housing units such as RAD, Project-Basing Section 8 using MTW flexibilities, leveraging future portfolio opportunities under the Rental Assistance Demonstration, the Special Application Center, or other potential financing structures not presently known as of submission of Housing Connect's PHA Plan.</p> <p><b>Demolition and/or Disposition.</b> Describe any public housing projects owned by the PHA and subject to ACCs (including name, project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: <a href="http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm">http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm</a>. (24 CFR §903.7(h))</p> <p>Housing Connect has applied for Section 18 Demolition/Disposition for 24 units within Project Number UT003000003 known as Sunset Gardens. Sunset Gardens is located at 380 East 7200 South in Midvale, Utah 84047 and includes 8 - two bedroom units and 16 - three bedroom units. Unit #'s are as follows: 577, 578, 579, 581, 2556, 585, 587, 588, 590, 592, 593, 594, 596, 598, 599, 601, 603, 604, 606, 608, 610, 611, 613, and 614. The timetable for completion of the new project under 9% tax credits is anticipated to be December 2023. The existing units will be disposed of and demolished and the new units will be constructed, owned and managed by a subsidiary of Housing Connect. Our current waiting list reflects a need for one bedroom units for non-elderly, non-disabled individuals. Through the construction of a larger affordable LIHTC project, Housing Connect intends to add 63 - one bedroom units, replace all 8 - two bedroom units as well as add an additional 15 - two bedroom units. There will be 3 - three bedroom units. Families currently residing in 3 bedroom units will be able to receive an appropriately sized voucher or a replacement public housing unit. Housing Connect intends to apply for Tenant Protection Vouchers.</p> <p>Housing Connect has been approved for a RAD/Section 18 Demolition/Disposition blend for 149 units within Project Number UT003000001 known as The County Highrise. The County Highrise is located at 1966/1992 South 200 East, Salt Lake City, Utah 84115 and includes 149 - one bedroom units. Twenty of the units are accessible. Unit #'s are as follows: 81,82,83,84,85,86,87,88,89,90,91,92,93,94,95,96,97,98,99,100,101,102,103,104,105,106,107,108,109,110,111,112,113,114,115,116,117,118,119,120,121,122,123,124,125,126,127,128, 129,130,131,132,133,134,135,136,137,138,139,140,141,142,143,144,145,146,147,148,149,150,151,152,153,154,155,156,157,158,159,160,161,162,166,168,169,171,172,173,174,175,177,178,179,180,182,183,184,185,187,188,190,192,193,195,197,198,200,202,203,206,208,209,211,212,214,216,217,219,221,223,225,226,227,228,230,231,233,234,236,238,239,241,242,244,245,246,249,250,252,254,256,258,260,262,264,267,269,271,272. The timetable for completion of the new project under 4% tax credits is anticipated to be</p>
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late 2023, with the renovation of the adjacent property, which is currently owned by the Housing Authority of Salt Lake City completed in 2024. For additional detail please see attachment 2.

Housing Connect will also evaluate disposition for Granger, UT003000004E; Harmony Park, UT0030000003; Union, UT0030000003; Erin Meadows, UT0030000003 using MTW flexibilities.

Housing Connect intends to use funds from the disposition of Public Housing to support RAD and new acquisition activities to provide affordable housing opportunities.

**Conversion of Public Housing to Tenant Based Assistance.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(i))

Housing Connect will evaluate the need and feasibility for conversion to Tenant Based Assistance and likely by way of Section 18 or Section 22:

1 Highrise	UT0030000001	149	4% Low Income Housing Tax Credit allocation awarded RAD/ Section 18 (40-60% as new regulations allow.)
2 Sunset	UT0030000003B	24	met obsolescence, awarded 9% tax credits, awarded tenant replacement vouchers, relocation has commenced in anticipation of redevelopment of the site in 2022.
3 Valley Fair Village	UT0030000002A	100	This property is located in West Valley City center. The city is not supportive of redeveloping this property. Therefore we will put significant Capital Fund and disposition proceeds to address capital needs.
4 Granger	UT0030000004E	24	This property is located in West Valley City and the zoning does not support redevelopment. We plan to work with a consultant to develop a plan to renovate the property. We will evaluate 4% bonds, Low Income Housing Tax Credits, project-basing units, using conventional debt and other financing mechanisms.
4 Harmony Park	UT0030000003	20	We plan to work with a consultant to develop a plan to renovate the property. We will evaluate 4% bonds, Low Income Housing Tax Credits, project-basing units, using conventional debt and other financing mechanisms.
5 Union	UT0030000003	30	We plan to work with a consultant to develop a plan to renovate the property. We will evaluate 4% bonds, Low Income Housing Tax Credits, project-basing units, using conventional debt and other financing mechanisms.
6 Erin Meadows	UT0030000003	34	We plan to work with a consultant to develop a plan to renovate the property. We will evaluate

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4% bonds, Low Income Housing Tax Credits,  
project-basing units, using conventional debt  
and other financing mechanisms.

**Conversion of Public Housing to Project-Based Assistance under RAD.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to project-based assistance under RAD. See additional guidance on HUD's website at: [Notice PIH 2019-23](#)

Housing Connect returned the CHAPs in consultation with the HUD RAD office will continue to evaluate the feasibility and most suitable conversion for each of the following properties:

1	Valley Fair Village	UT003000002A	100
2	Granger	UT003000004E	24
3	Harmony Park	UT0030000003	20
4	Union	UT0030000003	30
5	Erin Meadows	UT0030000003	34

Housing Connect will convert to Project Based Vouchers and/or Project Based Rental Assistance under the guidelines of PIH Notice 2019-23 REV-4 and any successor Notices. Upon conversion to Project Based Vouchers and/or Project Based Rental Assistance, Housing Connect will adopt the resident rights, participation, waiting list and grievance procedures under the guidelines listed in PIH Notice 2019-23 REV-4, the respective sections and PIH Notices available at time of conversion. Housing Connect will also adopt site based waiting lists; with respect to the Highrise, Housing Connect will adopt a selection preference for elderly households. Housing Connect will ensure that the RAD conversions comply with all applicable site selection and neighborhood reviews standards and that all appropriate procedures have been followed. Housing Connect certifies that it is currently compliant with all fair housing and civil rights requirements, including those imposed by any remedial orders or agreements, namely the 2003 voluntary compliance agreement (504 audit).

Furthermore, Housing Connect, as the owner of the County Highrise, and the Housing Authority of Salt Lake City, is working toward the conversion of the County Highrise that will merge what is currently 2 separate Public Housing properties with 2 separate CHAPS into 1 Public Housing property and 1 CHAP. Housing Connect through an affiliate, will serve as the general partner of a new owner entity known as New City Plaza. Housing Connect will acquire the Housing Authority of Salt Lake City's interest and will be the contract administrator for all of the units under the housing assistance payment contract. Housing Connect anticipates completion of this in the first quarter of 2022, with extensive renovation proceeding into 2024.

Additionally, Housing Connect certifies that it is currently compliant with all fair housing and civil rights requirements, including those imposed by any remedial orders or agreements, namely the 2003 voluntary compliance agreement (504 audit).

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing housing authorities including Housing Connect with access to private sources of capital to repair and



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preserve its affordable housing assets. The following Projects have achieved the following within calendar year 2021:

1. Obtained approval for RAD/Section 18 (40-60%)
  - a. Highrise UT003000001 as part of 4% LIHTC Renovation
2. Anticipated to be evaluated for demolition
  - a. Sunset Gardens UT003000004B as part of 9% LIHTC Section 18 Demolition

Please note that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Housing Connect may also borrow funds to address their capital needs.

**Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers. ([24 CFR §983.57\(b\)\(1\)](#)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

Housing Connect's Board of Commissioners has approved policies allowing Housing Connect to project-base up to 20% of the program or up to 535 vouchers. To date, 261 vouchers have been project-based. This does not include 25 VASH project-based vouchers, 114 RAD-Project-Based Vouchers and 28 Project-Based Vouchers from Public Housing disposition. Housing Connect would also like to exercise it's 10% option under HOTMA to provide an additional 226 project-based vouchers. (Housing Connect's 25 VASH project-based vouchers, 114 RAD-Project-Based Vouchers and 28 Project Based Vouchers from Public Housing disposition are excluded from the 10% or 20% cap.)

Housing Connect plans to continue to project base vouchers to support development of affordable housing for extremely low-income households. Twenty-four PBV will be placed at Sunset Gardens.

**Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

Housing Connect requests and receives approval from the local field office prior to placing any unit(s) into modernization status. Requests are made when a contract for modernization work has been awarded.

**Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

Based on guidance from The Housing Opportunity Through Modernization Act of 2016 (HOTMA), Housing Connect would like to reserve the right to transfer up to 20 percent of our Operating Funds to our Capital Funds. (See B.1 Financial Resources)

### B.3 Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

#### 2021-2025 Agency Goals

- Maintain high performer status with HUD subsidized Housing Programs
  - Received High Performer status in Housing Choice Voucher program with 100% SEMAP score.
  - Received High Performer status in Public Housing program at 90%.

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	<ul style="list-style-type: none"> <li>• Increase Affordable Housing physical units by 350 <ul style="list-style-type: none"> <li>◦ Increased 157 at the HUB in fiscal year 2020-2021</li> </ul> </li> <li>• Increase Affordable Rental Subsidies by 300 units <ul style="list-style-type: none"> <li>◦ Increased 368 total subsidies outlined below: <ul style="list-style-type: none"> <li>■ 72 FUP - FY21</li> <li>■ 111 Mainstream - FY21</li> <li>■ 10 VASH - FY21</li> <li>■ 10 HOPWA - FY21</li> <li>■ 9 HARP - FY21</li> <li>■ 25 Behavioral Health PBV - FY21</li> <li>■ 131 Emergency Housing Vouchers - FY22</li> </ul> </li> </ul> </li> <li>• Diversify funding <ul style="list-style-type: none"> <li>◦ Over the last 15 years, we have increased our non HUD funding from 11% of total funding in 2005 to 36% funding in 2021. Our goal is to continue to diversify our funding further in the next several years. We will do this by increasing funding in the State of Utah, Salt Lake County, and other local government funding, as well as increasing the number of properties serving low income households and thus increasing tenant rent income.</li> </ul> </li> <li>• Reposition and secure long-term viability of Public Housing properties <ul style="list-style-type: none"> <li>◦ Housing Connect received 9% LIHTC to redevelop Sunset Gardens. We've received approval for Section 18 and plan to utilize Tenant Protection Vouchers. Goal is to begin construction by mid 2022.</li> <li>◦ Hunter Hollow has converted through RAD and has been fully renovated.</li> <li>◦ Highrise is progressing.</li> </ul> </li> <li>• Enhance and grow supportive services that maintain housing assistance and promote well-being <ul style="list-style-type: none"> <li>◦ Housing Connect officially adopted the Social Determinants of Health (SDoH) framework and has focussed efforts in two key areas: Housing Stability and Education Access. For both, Housing Connect secured funding to support activities that make a direct impact in these two areas. In 2021, Housing Connect hired a part time SDoH Coordinator, 1 FTE Housing Stability Specialist, and 1 FTE Education Liaison.</li> </ul> </li> </ul>
<b>B.4.</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> X <input type="checkbox"/></p> <p>(b) If yes, please describe: HUD did not require the annual SEMAP reporting requirement. Housing Connect did not perform the SEMAP nor any other internal review of Section 8 tenant files and calculations. This finding has been resolved and an internal process set up to review tenant files and calculations.</p>
	<b>Other Document and/or Certification Requirements.</b>
<b>C.1</b>	<p><b>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</b></p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

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C.2	<p><b>Civil Rights Certification.</b></p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y   N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.4	<p><b>Certification by State or Local Officials.</b></p> <p><u>Form HUD 50077-SL</u>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
D	<p><b>Statement of Capital Improvements.</b> Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
D.1	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>Housing Connect's Five Year Plan for the Fiscal years beginning July 1, 2020, through June 30, 2025, was submitted August 31, 2020.</p>



# **Attachment 1:**

## **Statement of Housing Needs**





## INTRODUCTION

The State of Utah, and Salt Lake County in particular, face an affordable housing crisis. From 2010 - 2020, Utah has led the country in population growth as a result of high birth rates and employment opportunities. This growth generated an increased demand for housing. Housing development has always been limited on the Wasatch Front due to the geographic constraints of the Oquirrh Mountains and Great Salt Lake to the west and the Wasatch Mountains to the east. The growing demand for additional housing coupled with the geographic limitations is causing building costs and home values to increase beyond most households' means.<sup>1</sup>

There are over 119,000 renters in Salt Lake County and two-thirds of those renters are classified as low-income, with income below 80% of Area Median Income.<sup>2</sup> This population is disproportionately impacted by the housing shortage. This report will explore the compounding factors contributing to the housing crisis in more detail and demonstrate how the Housing Authority of the County of Salt Lake dba Housing Connect plans to address the need for low-income residents of Salt Lake County.

## AFFORDABLE HOUSING GAP

The affordable housing gap in Salt Lake County is significant and disproportionately impacts the households with the lowest incomes. This gap is the difference between the number of households in need of housing and the number of units that are affordable and available for rent.<sup>3</sup> For households earning 50% or more of the Area Median Income (AMI) in Utah, there is sufficient affordable housing. For households below 50% of AMI, however, there is a 40,725 unit deficit.<sup>4</sup> This means that for every 100 households with income below 50% of AMI, there are only 58 affordable units available. For households below 30% of AMI, the situation is even worse, with only 31 of every 100 units qualifying as affordable.<sup>5</sup>

The demand for housing has resulted in rapidly increasing housing costs. According to the SLCo Consolidated Plan, 2020, housing prices have risen by 119% since 2000 and gross median rent has increased by 97%. While the cost of housing continues to increase, income has not kept pace. Over the last 10 years, rents have increased 5% annually while wages have only increased by 3% each year. Between 2020-2021, rents increased 10%.<sup>6</sup>

In addition to the current housing gap, Salt Lake County was growing more rapidly than housing units were being built for a period of 7 years. The community received a positive sign in 2018, when the number of new units began to exceed the number of new households, indicating that we will begin to see the housing gap closing.<sup>7</sup> This trend has continued through 2021. In the recent Garner Business Review article, "What Rapidly Rising Prices Mean for Housing Affordability", James Wood et. al provide a comprehensive summary of the compounding factors that have resulted in fewer units being developed. Because demand for commercial and residential development is high, the cost for labor and supplies has also increased. In addition, the need for skilled laborers has increased as more developments are underway. Although this is a benefit for the workers, it also results in higher per unit costs for developments, restricting the number of units that can be set aside for low-income households. Additionally, land is expensive. Land in high opportunity areas<sup>8</sup>, where poverty rates are low and school

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<sup>1</sup> James Wood, Dejan Eskic, D.j. Benway, "What Rapidly Rising Prices Mean for Housing Affordability"(Gardner Business Review,2018) 17-18

<sup>2</sup> American Community Survey 2015-2019

<sup>3</sup> The US Department of Housing and Urban Development (HUD) considers housing affordable when no more than 30% of the household income is allocated towards rent/mortgage.

<sup>4</sup> US Department of Housing and Urban Development Comprehensive Housing Affordability Strategy, 2011-2015

<sup>5</sup> State of Utah Affordable Housing Assessment (2020)

<sup>6</sup> James Wood, Dejan Eskic, D.j. Benway, "The State of the State's Housing Market" (Gardner Policy Institute, 2021), 10

<sup>7</sup> Ivory Boyer 2019 Year End Construction report

<sup>8</sup> US Department of Housing and Urban Development (HUD) has issued several definitions for high opportunity areas. This statement references the FHFA's Duty to Serve definition which identifies a high opportunity area as either an area designated by HUD as "Difficult Development Area" where development costs are high compared to AMI, or an area designated by the state or local Qualified Allocation Plan as a high opportunity area. To qualify under either definition, poverty rates must fall below 10%.

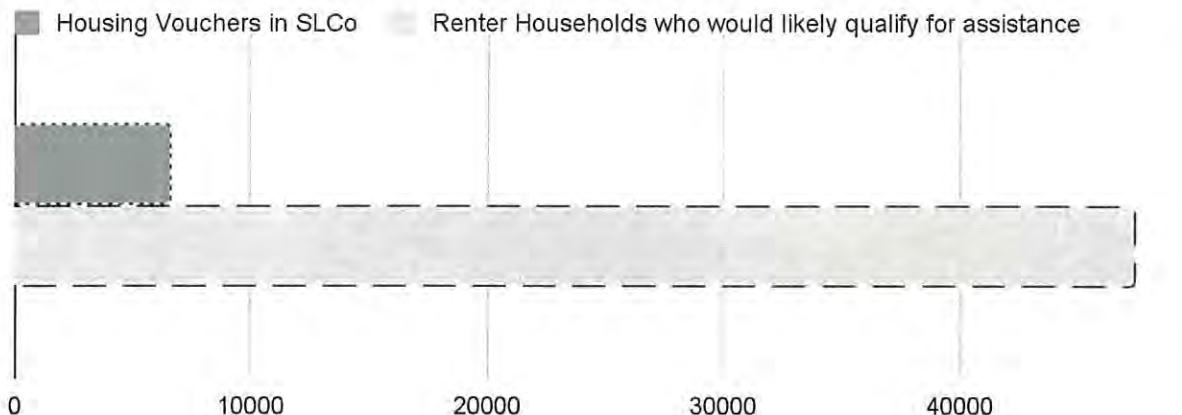
performance is high, is even more expensive. Many communities have zoning laws that restrict the use of land to prevent multi-family developments. Developers interested in providing affordable housing are outbid by high end apartment developers or are prevented from building due to NIMBYism (Not in my backyard).

While these compounding factors remain the case, the housing gap will continue to exist. Salt Lake County will continue to face low vacancy rates and an extremely competitive housing market. In fall 2021, rental vacancy rates in Salt Lake County fell below 2%, while 5% is generally considered a balanced market.<sup>9</sup>

### NEED FOR AFFORDABLE HOUSING OPTIONS

For the select few low-income households who are fortunate enough to secure a Housing Choice voucher in Salt Lake County, housing is affordable. However, the demand for housing vouchers greatly outpaces the supply. Across the three housing authorities serving Salt Lake County, there are 6,584 Housing Choice vouchers.<sup>10</sup> Meanwhile, there are over 47,000 renters who would likely qualify for assistance. The Salt Lake Centralized Waiting List for Housing Choice Vouchers used by Housing Connect and the Housing Authority of Salt Lake City was recently open for 14 months, from January 2020 - March 2021. As of December 2021, there are currently 6,559 households waiting for rental assistance. Housing Connect operates 3,028 Housing Choice Vouchers, including Special Purpose Vouchers, and an additional 689 vouchers through federal, state and local partnerships. There is a need for additional rental subsidies to support low-income households, and Housing Connect seeks all opportunities to offer additional Housing Choice and other rental assistance vouchers.

## Housing Choice Vouchers in SLCo & Low Income Renter Households who pay > 30% of income to rent



### Need for Units Designated for Low-Income Households

Even among those who receive a rental subsidy, access to quality, affordable housing is limited by low vacancy rates. Low vacancy rates indicate that when a household is looking for an apartment, there are few to choose from. The landlord has a pool of applicants from which to select their next tenant. When vacancy rates are low, landlords often charge additional fees during the application phase such as application fees, holding fees, and larger deposits. For low-income households, these fees can be significant obstacles that prevent them from applying. Any additional barriers to housing that a household may have such as poor credit, history of eviction, debt owed to landlords, or criminal history, most of

<sup>9</sup> James Wood, Dejan Eskic, D.j. Benway, "The State of the State's Housing Market" (Gardner Policy Institute, 2021), 10

<sup>10</sup> Including specialty vouchers, HUD Housing Choice Voucher (HCV) Data Dashboard

([https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/hcv/dashboard](https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/dashboard), data current as of September 2021)



which disproportionately impact low-income renters, make securing a home even harder. After being issued a voucher, 21% of households are never able to secure a unit and lease up.

Project Based Vouchers and other structures that allow units to be set aside for low-income households help to secure units for households with the highest barriers to housing. Housing Connect operates 402 Project Based Voucher units set aside through new developments, RAD conversions and community partnerships. Additional sustainable units need to be set aside for households with the highest barriers to housing in order to put affordable housing in reach for all households in our community.

### **Public Housing**

The traditional HUD model of Public Housing is used in communities to address the challenge of finding and securing units. Public Housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Housing Connect operates 391 Public Housing units. Presently, 173 of those units are going through either a RAD conversion or Section 18, leaving 218 Public Housing units available. Like Housing Choice Vouchers, these units are also in high demand. The waitlist for Public Housing units is currently open and there are 4,877 households on the list.

Public Housing has become increasingly difficult to sustain over the past 20 years. The capital needs to sustain the aging units continue to increase while the resources to maintain them decrease. Using the RAD demonstration program and Section 18, Housing Connect is addressing some of the required present and future capital needs. There is a long term pattern of underfunding Public Housing, which continues to leave significant capital needs unmet. Capital funding has decreased by over \$200,000 over the past 20 years while Public Housing units continue to age and capital needs continue to grow. Although we work on preserving the critically needed housing stock provided by Public Housing, our capital needs exceed available funding. In 2017, the Housing Authority contracted a Green Physical Needs Assessment (GPNA) which provided a comprehensive evaluation of the current and future needs of the agency's Public Housing over the next 20 years. This study identified over \$14.5MM in capital needs for our remaining 218 Public Housing units at an average of \$66,701 per unit to be completed over the next 20 years.

The Department of Housing and Urban Development (HUD) recognizes the challenges with sustainability of Public Housing. To address this, HUD has introduced voluntary programs to provide housing authorities with the tools to transition public housing units out of public housing while maintaining the incredibly valuable affordable units within the community. Rental Assistance Demonstration (RAD) is one of those tools. RAD provides housing authorities with access to funding to make needed improvements to the properties. The RAD program is also a way for housing authorities to convert their public housing units to Housing Choice Voucher contracts so that the rent will continue to be affordable for residents. In 2018, Housing Connect submitted five applications for this new program and is assessing the viability of RAD. In 2020, three Public Housing properties transitioned to RAD and in 2021 one property transitioned to RAD. Since the original application, the agency has pulled several properties back off of the RAD/CHAP waiting list, because conversion is not currently financially feasible. These will be reassessed for reapplication using MTW flexibilities. In addition, Housing Connect has disposed of 127 units of scattered site Public Housing. There is a need for a long-term sustainability plan to maintain Public Housing.

### **VULNERABLE POPULATIONS**

Defining the vulnerable populations as they relate to affordable housing can be difficult because the reasons and characteristics of vulnerability are so varied. It is also critical, however, to identify the populations who need to be considered when affordable housing decisions are made. This section will outline those groups that Housing Connect considers when making decisions related to affordable housing.

#### **Low-Income Households**

The affordable housing gap disproportionately impacts low-income households. The Housing Gap becomes apparent when households earn less than 50% of Area Median Income (AMI). Therefore, Housing Connect identifies very-low (50% of AMI) and extremely-low (30% of AMI) income households as a vulnerable population.

Area Median Income for a Family of 4		
Area Median Income	50% of AMI	30% of AMI
\$92,200	\$46,100	\$27,650

HUD defines Cost Burden as a household paying more than 30% of gross income to rent/mortgage. If a household is paying over 50% of gross income to rent/mortgage, HUD considers this to be a Severe Cost Burden. Renters earning less than 50% of AMI experience severe cost burden at an alarming rate. In Salt Lake County, a renter earning less than 50% of AMI has a 49% chance of being severely cost burdened. At 30% of AMI, 63% of households pay more than 50% of their income toward rent. The chart below demonstrates the impact of cost burden on a household earning 30% of AMI in Salt Lake County.

A Family of	With annual earnings of <sup>11</sup>	Can afford a monthly rent of <sup>12</sup>	In Salt Lake County, their apartment will cost <sup>13</sup>	Cost Burden
1	\$19,400	\$485	Studio - \$924	\$439
2	\$22,150	\$554	One Bedroom - \$1,112	\$558
3	\$24,900	\$623	Two Bedroom - \$1,327	\$704
4	\$27,650	\$691	Three Bedroom - \$1,843	\$1152

Housing Connect targets affordable housing resources toward those most in need in the community. The average annual income of Housing Choice Voucher holders is \$13,650 and the average annual income of Public Housing residents is \$11,000. Of the residents served by Housing Connect 83% have Extremely Low Income, earning less than 30% of AMI. An additional 13% are Very Low Income, with income falling below 50% of AMI.<sup>14</sup> In addition, Housing Connect considers the Vulnerable Populations outlined in the Salt Lake County Analysis of Impediments when considering changes to affordable housing options.

### Homeless Households

Housing Connect supports the U.S. Department of Housing and Urban Development's (HUD) efforts to end homelessness, and identifies homeless households as a vulnerable population. In support of HUD's goal to end homelessness, Housing Connect seeks opportunities to end homelessness among specific populations of homeless households including chronically homeless individuals and families, homeless families, youth and children, and homeless veterans.

### Protected Classes

Housing Connect also identifies three protected classes who have been identified as Vulnerable Populations in the Salt Lake County Analysis of Impediments (2014)<sup>15</sup>.

#### Large Family Sizes

Although familial status is a protected class, discrimination against families looking for rental units is still a major concern. Familial status is the second highest reported class of discrimination in Utah. In Salt Lake County, large households, those with five or more family members represent 14% of all rental households. This population is disproportionately renters and they face unique challenges in securing a rental unit. Additionally, large families with children seek out rental units that are in safe areas with good

<sup>11</sup> 2021 HUD Income Extremely Low Income Limits Salt Lake County Annual Income

<sup>12</sup> Monthly Affordable Housing Guideline (30% of Monthly Income)

<sup>13</sup> FY 2022 Salt Lake County Fair Market Rate (FMR)

<sup>14</sup> HACSL database, December 2018 Data for HCV & HCV Waitlist and PH & PH waitlist residents

<sup>15</sup> Statistics included below regarding the vulnerable populations are from the "Salt Lake County: Analysis of Impediments," (2014) unless otherwise cited.

school districts, meaning that this population has area-specific housing preferences that result in increased competition and higher prices on the open market.

The scarcity and competition large households face in securing a housing unit often means that unit availability dictates where the family will live instead of other factors such as quality of life, proximity to work and schools, or neighborhood safety. This is especially true of families with Housing Choice vouchers. The restrictions placed on families requiring 5+ bedroom units is illustrated by the uneven population distribution of large families. Less than 10% of large renter families live in South Jordan, Riverton, Herriman, Bluffdale, and Draper, despite over 15% of the Salt Lake County population residing in these areas. Large renter families are underrepresented in these areas as a product of rental unit scarcity and landlords reluctant to rent to families with lots of children. On the contrary, nearly half of all large family renters live in Salt Lake City, West Valley Central, South Salt Lake, and Taylorsville, while only 38.67% of the county's population resides in these areas. The overrepresentation of large renter families in these areas is a product of how the distribution of rental units restricts the options of large families. Additionally, large families have an increased risk of severe cost burden at 37%, as opposed to 25% of all households. This population faces disproportionate barriers to housing and is more vulnerable to increased market competition.

#### Disabled and Elderly

Like many metropolitan areas, Salt Lake County faces an oncoming demographic shift as the baby boomer generation enters retirement. Although Salt Lake City is comprised of a smaller percent of seniors than the national average, 10% seniors compared to 15.6% nationwide,<sup>16</sup> demographic projections show a state-wide increase in the elderly population, incurring a new demand for housing suitable for aging residents.<sup>17</sup> The historically low elderly population means that Salt Lake City has a shortage of housing conducive to the latter stages of life, which will be required if elderly population increases as the projections show. The principles of Life Cycle Housing acknowledge that people have different housing needs at different stages of their lives. The lack of housing for an aging population means that many elderly residents will face the difficult decision of either contending with housing that doesn't fit their needs or uprooting themselves from their community to seek out more suitable housing.

One of the most common housing needs among the elderly is a unit conducive to mobility limitations. The required mobility accommodation can range from a unit without stairs to a Type A unit, suitable for a wheelchair. The 2010 census shows that 8% of the Salt Lake County population is disabled; however, seniors experience disabilities at a much higher rate, comprising 37% of all people with a disability. There are an estimated 5600 renters with ambulatory disabilities in Salt Lake County, contributing to a demand for units specially outfitted to meet Type A accessibility standards for wheelchair access. While the Fair Housing Act standard is sufficient for many renters, there is an additional need for Type A standard units, and the demand far outstrips the supply. It is projected that 1800 residents of Salt Lake County require a wheelchair, while the supply of units that can accommodate a wheelchair has largely remained stagnant since 2003. Currently there are estimated 285 Type A units in Salt Lake County and their geographic distribution is severely limited. Half of all Type A units are in Salt Lake city, and the remaining units are concentrated around South Salt Lake, Murray, Midvale, West Valley Central, Taylorsville, and Kerns. The inadequate distribution of Type A units restricts the ability of the elderly to age in place and limits their options for fair housing. Currently, 2,800 disabled residents are severely cost burdened, very low-income, and receiving no rental assistance.

#### Minority Households

Housing Connect strongly condemns racism and bigotry in every form. As an agency we believe in fairness, equity, and inclusion for every person. It pains us to know that these basic decencies are denied to people because of the color of their skin. We are committed to fighting against racial inequity and injustice in the important housing work that we do.

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<sup>16</sup> US Census 2010

<sup>17</sup> "Growing SLC: A Five Year Housing Plan 2018-2022," (2017), 36

Salt Lake County is undergoing rapid population expansion and 52% of the population growth between 2010-2020 is driven by minority populations<sup>18</sup>. Minority growth in Salt Lake County has been trending upwards since 2000. The growing minority population is disproportionately distributed in lower opportunity areas such as Kearns, Magna, Midvale, Salt Lake City River District, South Salt Lake, Taylorsville, and West Valley Central. These areas hold 35% of the total population, but 58% of the minority population.

The increasingly competitive housing market is more likely to benefit white households and hinder minority households. Only 29.6% of white households in Salt Lake County rent. The high rates of homeownership among white households means this population will benefit from increased home equity as the housing market rises. However, minorities rent at higher rates than whites with 52.4% of minority households renting housing units. Among renters, minorities are more likely to experience severe cost burden than whites. Only 19.8% of white renters are severely cost burdened, as compared to 32.4% of minority renters. Therefore, minorities will bear the brunt of rising rental prices as demand outpaces supply and an increasingly competitive rental market squeezes low-income minorities out of high opportunity areas.

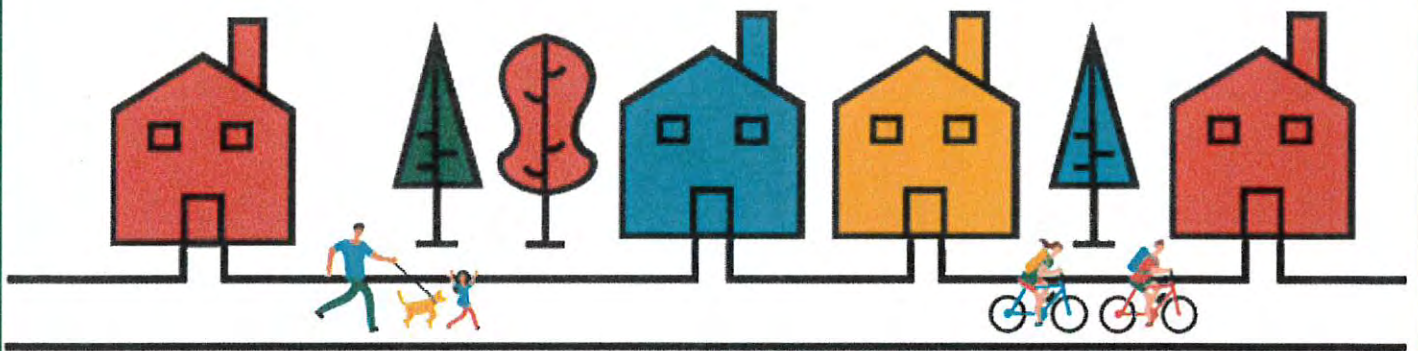
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<sup>18</sup> "Fact Sheet: First Insights - 2020 Census Race and Hispanic or Latino Origin in Utah" Kem C Gardner Policy Institute, August 2021



## **Attachment 2:**

# **Rental Assistance Demonstration (RAD)**



**The Housing Authority of the County of Salt Lake**  
**d/b/a Housing Connect (“Housing Connect”)**

**Attachment [2] – Rental Assistance Demonstration (RAD)**

Housing Connect was a successful applicant in the Rental Assistance Demonstration (“RAD”). As a result, Housing Connect’s 2021-2022 Annual Plan previously considered only the RAD conversion of County High Rise (“**Highrise**”) one hundred forty-nine (149) public housing units under the guidelines of PIH Notice 2019-23, REV-4 and any successor notices. However, since the U.S. Department of Housing and Urban Development’s (“**HUD**”) introduction of the RAD/Section 18 Construction blend (the “**Blend**”) in PIH Notice 2021-07, Housing Connect has adjusted the planned RAD conversion for Highrise. The Blend offers greater options for a portion of the RAD converting project to be “disposed” of through Section 18 of the U.S. Housing Act of 1937 (“**Section 18**”). The benefits of the blend authority, specifically the addition of Section 18, include the issuance of Tenant-Protection Vouchers for disposed units with subsidy required to be project-based at the development up to fair market rent amounts instead of the lower RAD contract rents. All units proposed for removal via Section 18 and RAD must comprise a project, as defined in RAD Notice (PIH Notice 2019-23/ H Notice 2019-09) equating to a single transaction or phase.

This attachment includes a RAD conversion pursuant to Blend authority. Housing Connect, through an affiliate, will serve as the general partner of a new owner entity known as New City Plaza, LLC (the “**Partnership**”). The Partnership will be the owner of a project comprised of two buildings situated on a single parcel of 3.16 acres. The first building, City Plaza, contains one hundred sixty-six (166) one-bedroom units and one (1) two-bedroom unit and is currently under an annual contributions contract (“**ACC**”) with the Housing Authority of Salt Lake City (“**HASLC**”); the second building, Highrise, contains one hundred thirty-two (132) one-bedroom units and is currently under an ACC with Housing Connect. HASLC and Housing Connect currently own the buildings as tenants in common. Simultaneously with the conversion of City Plaza and Highrise under RAD and Section 18, HASLC will convey its interest in the converting property to Housing Connect. The converted property will be known



as New City Plaza. Housing Connect will be the contract administrator for all units under a housing assistance payment contract (“**HAP Contract**”) with HUD, and Housing Connect will provide onsite property management, to comprise a portion of the total project units. The Section 18 conversion includes the disposition of up to 60% of the total project units and the remaining 40% to transfer out of public housing through RAD. This equates to 120 RAD Project Based Vouchers (“**PBV**”) and 179 Section 18 Tenant Protection Vouchers.

To facilitate the uniform treatment of residents, households living in either RAD PBV units or “Section 18” non-RAD PBV units at New City Plaza Apartments will be entitled to the same residents rights, participation, waiting list and grievance procedures listed within per Notice H-2019-09, PIH 2019-23 (the RAD Notice), and Joint Housing Notice H 2016-17/PIH 2016-17. Housing Connect maintains the certification that the proposed RAD/Section 18 Conversion will comply with all applicable site and neighborhood standards, and the site will be in full compliance with applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations. Review will be completed for accessibility for persons with disabilities and the design of any proposed improvements will be consistent with applicable accessibility standards under the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and the regulations in the American with Disabilities Act.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Housing Connect with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, Housing Connect’s Capital Fund Budget will be reduced by the pro rata share of public housing developments converted as part of the Demonstration, and that Housing Connect may also borrow funds to address their capital needs.

Below, please find specific information related to the Public Housing Development(s) selected for RAD:

## Development #1

Name of Public Housing Development: <u>City Plaza Apartments/County Highrise</u>	PIC Development ID: <u>UT004000402/UT003000001</u>	Conversion type (i.e., PBV or PBRA): <u>RAD_PBV Section 18 TPV Blend</u>	Transfer of Assistance: <u>149 County Highrise units transferring to HC HAP Contracts</u>
Total Units: <u>150/149</u>	Pre- RAD Unit Type (i.e., Family, Senior, etc.): <u>Combined: 143 Senior, 156 Mixed Designation</u>	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): <u>299 Senior</u>	Capital Fund allocation of Development: <u>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) n/a</u>
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
One Bedroom	298	298	The HAP Contracts to be administered by HC with Property Management by a Housing Connect non-profit
Two Bedroom	1	1	
<u>(If performing a Transfer of Assistance, explain how transferring waiting list):</u>	Highrise holds a designated waiting list Pre-RAD. This waiting list will be combined with the existing City Plaza Apartments waiting list by time and date order.		
	There will be no change in number of units per bedroom type, no De Minimis Reduction, and no unit reconfigurations. Project includes issuance of 4% tax credit, FHA 221 (d)(4) debt.		
<u>Evidence of Consultation with residents</u>	Meetings were initially held in 2018 and 2019 with most recent resident meetings held in June 24, 2021 and August 19, 2021.		
<u>Description of PHA's proposed future use of the development</u>	Existing PH units are being converted to project based vouchers and tenant protection vouchers. Residential configuration of City Plaza has no change, while County Highrise is to transition to Senior from mixed designation.		
<u>Relocation Plan</u>	Relocation plans are within the building phases of approximately 70 units in stacks per phase on a 24-month schedule. The majority of residents will move once with moving assistance provided (first resident phase may have to move twice.) Relocation specialist has been procured and in planning with the contractor and partnership owners.		

## PBV Resident Rights and Participation

- No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility

requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement.

**2. Right to Return.** City Plaza Residents have the full right to stay at the property with relocation within the building in phases, blocks of 70 units per phase over a 24-month period.

**3. Renewal of Lease.** Since publication of the PIH Notice 2012-32 Rev 3, the regulations under 24 CFR § 983.257(b)(3) have been amended requiring Project Owners to renew all leases upon lease expiration, unless cause exists. MTW agencies may not alter this requirement.

**4. Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3(definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion. The method described below explains the set percentage-based phase-in the owner must follow according to the phase-in period established. For purposes of this section "standard TTP" refers to the UP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from public housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

Three Year Phase-in:

Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion — 33% of difference between most recently paid TTP or flat rent and the standard TTP



Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR — 66% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and all subsequent re-certifications — Full standard TTP

Five Year Phase-in:

Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion — 20% of difference between most recently paid TTP or flat rent and the standard TTP

Year 2: Year 2 AR and any IR prior to Year 3 AR — 40% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and any IR prior to Year 4 AR — 60% of difference between most recently paid TTP and the standard TTP

Year 4: Year 4 AR and any IR prior to Year 5 AR — 80% of difference between most recently paid TTP and the standard TTP

Year 5: AR and all subsequent re-certifications — Full standard TTP

*Please Note:* In either the three-year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies may not alter this requirement.

Housing Connect has elected to follow the Three-Year Phase-in Plan.

**Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.**

Public housing residents that are current FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any remaining PH FSS funds, to serve those FSS participants who live in units converted by RAD. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the FY15 Appropriations Act), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that there are certain FSS requirements (e.g. escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100. Further, upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

**Housing Connect has no FSS participants in the current Public Housing program and all units are Senior/Disabled. Eligible participants may enroll in FSS following entry into the PBV program. Housing Connect currently has a ROSS coordinator at Highrise, which is funded through a ROSS grant. The ROSS grant will be transferred to other public housing developments and the service coordinator at Highrise will be funded through the operating budget.**

**Resident Participation and Funding.** In accordance with Attachment 1B, residents of Covered Projects with converted PBV assistance will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

**Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

**Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:

- a. A reasonable period of time, but not to exceed 30 days:
  - i. if the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or

- ii. In the event of any drug-related or violent criminal activity or any felony conviction;
- b. 14 days in the case of nonpayment of rent; and
- c. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

**Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional procedural rights to comply with section 6 of the Act. For issues related to tenancy and termination of assistance, PBV program rules require the Project Owner to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

- a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
  - i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
  - ii. For any additional hearings required under RAD, the Project Owner will perform the hearing.
- b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
- c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- d. The Project Owner provides opportunity for an informal hearing before an eviction.



Pursuant to current PBV program rules requirements, the above procedures are found in Chapter 17 of Housing Connect's HCV Administrative Plan.

**Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion e.g., due to loss of employment; tenants that move into the property following conversion, etc.,) is covered by this waiver.

#### **Jobs Plus.**

**When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may only select an occupied unit to be included under the PBV HAP Contract if the unit's occupants are eligible for housing assistance payments (24 CFR §983.53(d)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR§983.258). Since the rent limitation under this Section of the Notice may often result in a family's TTP equaling or exceeding the gross rent for the unit, for current residents (i.e. residents living in the public housing property prior to conversion), HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds than the Gross Rent. Further, HUD is establishing the alternative requirement that the rent to owner for the unit equal the family's TTP until such time that the family is eligible for a housing assistance payment. HUD is waiving as necessary to implement this alternative provision, the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR 983.301 as modified by Section 1.6.B.5 of this Notice. In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. Assistance may subsequently be

reinstated if the tenant becomes eligible for assistance. The PHA is required to process these individuals through the Form- 50058 submodule in PIC.

Following conversion, 24 CFR §983.53(d) applies, and any new families referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP Contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has vacated the property; and, if the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP Contract in accordance with 24 CFR §983.207 or, where "floating" units have been permitted, Section 1.6.B.10 of this Notice.

**Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR 983.259 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR 983.259 is waived. MTW agencies may not modify this requirement.

#### PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
2. **Additional Monitoring Requirement.** The PHA's Board must approve the operating budget for the Covered Project annually in accordance with HUD requirements.
3. **Bacon Act and Section 3** of the Housing and Urban Development Act of 1968 (Section 3). This section has been moved to 1.4.A.13 and 1.4.A.14.
4. **Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program wide, or site-based waiting list from which residents for the Covered Project will be admitted. These

provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies.

- i. Transferring an existing site-based waiting list to a new site-based waiting list. If the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the waitlist of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list.
- ii. Informing applicants on the site-based waiting list on how to apply for a PBV program-wide or HCV program-wide waiting list.

Informing applicants on a public housing community-wide waiting list on how to apply for a voucher-wide, PBV program-wide, or site-based waiting list. If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the converted project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency's public housing community-wide waiting list who wish to be placed onto the newly established site-based waiting list must be done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR §8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies.



To implement this provision, HUD is specifying alternative requirements for 24 CFR §983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR §983.251(c).

Housing Connect currently maintains site based Public Housing wait lists and will convert from Public Housing.

Site Based to PBV Site Based waiting list. There will be no change to placement, a straight conversion. All those currently on the wait list will be notified of the transition within the requirements for effective communication.

City Plaza/ County Highrise currently maintain individual site-based waiting list for the respective properties. The two waiting lists will be merged with date and time priority to create one site-based waiting list for the New City Plaza, LLC.

5. **Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
6. **Agreement Waiver.** This section has been moved to 1.6.(B)(7).
7. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of permanent debt during the HAP Contract term, to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

**Administrative Fees for Public Housing Conversions during Transition Period.** For the remainder of the Calendar Year in which the HAP Contract is effective (i.e. "transition period"), RAD PBV projects will be funded with public housing funds. For example, if the project's assistance converts effective July 1, 2015, the public housing Annual Contributions Contract (ACC) between the PHA and HUD will be amended to reflect the number of units under HAP Contract, but will be for zero dollars, and the RAD PBV contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time.

For fiscal years 2014 and 2015, PHAs operating HCV program received administrative fees for units under a HAP Contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect

immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR § 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the Section 8 ACC will be amended to include Section 8 funding that corresponds to the units covered by the Section 8 ACC. At that time, the regular Section 8 administrative fee funding provisions will apply.

**Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing an alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD.

The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan. To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) and 24 CFR part 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD. MTW agencies may not alter this requirement.

**Reserve for Replacement.** The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected

requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account covered under a General Depository Agreement (HUD-51999) or similar instrument, as approved by HUD, where funds will be held by the Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines and as directed by HUD.

#### **Significant Amendment Definition**

As part of the Rental Assistance Demonstration (RAD), Housing Connect is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- d. Changes to the financing structure for each approved RAD conversion.



# Other Documents

## Housing Connect

July 1, 2022—June 30, 2023

C.1/C.2 HUD 50077 ST HCV HP

C.3 RAB COMMENTS/MINUTES/APPROVAL

C.4 HUD 50077 STATE OR LOCAL OFFICIALS

C.5 HUD 50075.2 CAPITAL FUND PROGRAM



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

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 02/29/2016

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including  
Required Civil Rights Certifications**

*Acting on behalf of the Board of Commissioners of the 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 \_\_\_ 5-Year and/or X Annual PHA Plan for the PHA fiscal year beginning July 1, 2022, hereinafter referred to as "the Plan", 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 Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. 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.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of the County of Salt Lake  
 (dba Housing Connect)  
 PHA Name

UT003  
 PHA Number/HA Code

☒ Annual PHA Plan for Fiscal Year 2022-23

☐ 5-Year PHA Plan for Fiscal Years 20\_\_ - 20\_\_

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

Name of Authorized Official

Title

Spencer Moffat

Chair, Housing Connect Board of Commissioners

Signature

Date

March 16, 2022





The Mission of the RAB is to represent the interests of the residents receiving rent assistance from Housing Connect. The goal is to assist Housing Connect staff and Board of Commissioners to maintain and improve the quality of life for all residents.

The Mission of Housing Connect is to provide and develop quality affordable housing opportunities for individuals and families while promoting self-sufficiency, empowerment, and neighborhood revitalization.



**Housing Connect  
Resident Advisory Board  
Meeting Minutes  
March 9, 2022**

Board Members Present:

Mary Ann Ericksen - Chair  
Kathy Larsen - Vice Chair  
Jamie Ramos  
Gwen White  
Carl Schettler  
Royal Miller

Housing Connect Staff Present:

Braidee Kolendrianos  
Russell Opatz  
Marni Timmerman

Board Members Not Present:

Welcome

Mary Ann welcomed RAB Members and Housing Connect Staff.

Reading of the RAB Mission

Jamie read the Resident Advisory Board Mission.

Minutes Review

Mary Ann referenced the minutes from the January 2022 RAB meeting and asked for any comments, questions, or changes. RAB members need more time to review the minutes and plan to approve via email.

Annual Plan Review

Marni provided an update regarding the Annual Plan for FY 2023. She went over the proposed changes to the plan. She noted that the RAB members will need to hold a vote via email to approve the Annual Plan for FY 2023. This change is due to new language





needing to be added to the Plan regarding the New City Plaza acquisition. Marni then presented the Significant Amendment to the Annual Plan FY 2022. This Amendment explains Housing Connect will be purchasing the building next to the High Rise from the City Housing Authority. Jamie asked if this purchase will displace any families. Marni explained that no families will be displaced, but people are being moved to have their units remodeled. The main change is that Housing Connect will be the sole owner of the New City Plaza. Jamie asked if the RAD to Project Based Vouchers would impact those currently waiting on the waitlist for housing. Marni and Russell explained that it is a transition from one type of housing to another, meaning the waitlist will not be affected. Carl proposed to approve the Significant Amendment to the Annual Plan FY 2022. Gwen seconded the motion. Board approval was unanimous.

**Insert:**

On Friday, March 11, 2022, the Resident Advisory Board received via email the updated Annual Plan FY 2023 including appropriate language regarding the acquisition of the whole building to become New City Plaza.

Votes of Approval received via email:

Gwen White  
Jamie Ramos  
Kathy Larsen  
Carl Schettler  
Mary Ann Ericksen

Housing Connect Update

Marni shared the proposed Moving to Work Waivers Housing Connect will be submitting to HUD for approval. She asked for questions from RAB members regarding the proposed Waivers. Gwen asked they do outreach regarding FSS. Russell explained through referral, emails, flyers, website, etc., but all eligible clients for FSS are usually the same population as those eligible for Moving to Work Rent Reform. Marni reviewed the timeline and process of implementation. Marni noted she will need a vote of approval on the proposed Waivers in a future meeting.

Russell provided an SDOH update and noted Housing Connect services programs are beginning to track outcomes related to the SDOH categories.

Budget Review

Jamie reviewed the RAB budget up to date. Jamie asked for any questions from the RAB, there were no questions. Gwen and Russell discussed ideas for use of the extra funds. Braidee proposed meeting with RAB leadership (Mary Ann, Kathy, and Jamie) to discuss the use of funds. Royal motioned to approve the budget, Gwen seconded the motion. Approval was unanimous.

Board Recruitment

Mary Ann suggested recruiting from BBA, GMM, and VFV. April 13 will be the interviews of potential members, Mary Ann and Kathy will represent the RAB during the interviews.

Other

Braidee noted the NAHRO conference will be held in St. George from April 20-22, 2022.





Kathy, Jamie, and Carl were registered for the NAHRO conference. Braidee noted the Apartment Association Trade Show will be held in Sandy on April 26<sup>th</sup>. Mary Ann, Kathy, Carl, and maybe Jamie would like to attend.

Next Meeting

The next meeting will be held on Wednesday, May 11, 2022. We will evaluate whether to hold in person or via Zoom. Royal motioned to adjourn, Kathy seconded the motion.





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

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

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

I, Michael R. Gallegos, the Director of Housing and Community Development, Salt Lake County  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan for fiscal years \_\_\_\_\_ and/or Annual PHA Plan for fiscal  
year 2022-2023 of the Housing Authority of the County of Salt Lake (dba Housing Connect) is consistent with the  
*PHA Name*

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

Salt Lake County

*Local Jurisdiction Name*

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or  
State Consolidated Plan.

In alignment with the Salt Lake County Consolidated Plan, Housing Connect's PHA Plan outlines goals to increase units  
of affordable housing in the community, including units for households experiencing homelessness, elderly households,  
and households with special needs and to increase tenant based rental assistance. Housing Connect serves low income  
and special needs populations including Veterans, persons living with HIV/AIDS, youth aging out of foster care, non-  
elderly disabled, formerly homeless, and individuals with refugee status in alignment with the populations identified in  
the Salt Lake County AI who face additional barriers to stable housing.

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:

Michael R. Gallegos

Title:

Director of Housing and Community Development, Salt Lake County

Signature:



Date:

March 25, 2022

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

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

Capital Fund Program - Five-Year Action Plan

Status: Draft

Approval Date:

Approved By:

<b>Part I: Summary</b>						
<b>PHA Name :</b> Housing Authority of the County of Salt Lake		<b>Locality (City/County &amp; State)</b>				
<b>PHA Number:</b> UT003		<input checked="" type="checkbox"/> <b>Original 5-Year Plan</b> <input type="checkbox"/> <b>Revised 5-Year Plan (Revision No:            )</b>				
<b>A.</b>	<b>Development Number and Name</b>	<b>Work Statement for Year 1    2021</b>	<b>Work Statement for Year 2    2022</b>	<b>Work Statement for Year 3    2023</b>	<b>Work Statement for Year 4    2024</b>	<b>Work Statement for Year 5    2025</b>
	VALLEY FAIR VILLAGE (UT003000002)	\$441,290.00	\$278,987.00	\$278,987.00	\$278,987.00	\$278,987.00
	ERIN MEADOWS (UT003000003)	\$311,937.00	\$667,435.00	\$684,145.00	\$684,145.00	\$684,145.00
	MAGNA, ACADEMY PARK AND HUNTER (UT003000004)	\$25,000.00	\$25,000.00	\$25,000.00	\$25,000.00	\$25,000.00
	AUTHORITY-WIDE	\$413,902.00	\$430,612.00	\$413,902.00	\$413,902.00	\$413,902.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
02/28/2022

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2021				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	VALLEY FAIR VILLAGE (UT003000002)			\$441,290.00
ID0064	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water Lines/Mains)	Physical Improvements to Dwellings		\$441,290.00
	ERIN MEADOWS (UT003000003)			\$311,937.00
ID0068	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping,Dwelling	Physical improvements to dwellings		\$165,000.00



Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2021				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Site Work (1480)-Water Lines/Mains,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Stairwells - Fire Escapes,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting)			
ID0096	Relocation Costs(Contract Administration (1480)-Relocation)	Relocation Costs-Sunset Gardens		\$146,937.00
	MAGNA, ACADEMY PARK AND HUNTER (UT003000004)			\$25,000.00
ID0072	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Storm Drainage,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water	Physical Improvements to Dwellings		\$25,000.00

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2021				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$413,902.00
ID0080	Management Improvements(Management Improvement (1408)-System Improvements,Management Improvement (1408)-Staff Training)	Improvements to Central Office IT systems & Training activities		\$10,000.00
ID0084	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration of Capital Fund		\$134,634.00
ID0088	Operations(Operations (1406))	Operations Costs		\$269,268.00
	Subtotal of Estimated Cost			\$1,192,129.00

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 2 2022				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	VALLEY FAIR VILLAGE (UT003000002)			\$278,987.00
ID0065	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water Lines/Mains)	Physical Improvements to Dwellings		\$278,987.00
	ERIN MEADOWS (UT003000003)			\$667,435.00
ID0069	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Stairwells - Fire Escapes,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-	Physical improvements to dwellings		\$512,435.00



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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 2 2022				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Unit-Interior (1480)-Flooring (non routine), Dwelling Unit-Interior (1480)-Interior Doors, Dwelling Unit-Interior (1480)-Interior Painting (non routine), Dwelling Unit-Interior (1480)-Kitchen Cabinets, Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets, Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Other, Dwelling Unit-Interior (1480)-Plumbing, Dwelling Unit-Interior (1480)-Tubs and Showers, Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving, Dwelling Unit-Site Work (1480)-Curb and Gutter, Dwelling Unit-Site Work (1480)-Fencing, Dwelling Unit-Site Work (1480)-Landscape, Dwelling Unit-Site Work (1480)-Lighting, Dwelling Unit-Site Work (1480)-Parking, Dwelling Unit-Site Work (1480)-Pedestrian paving, Dwelling Unit-Site Work (1480)-Seal Coat, Dwelling Unit-Site Work (1480)-Striping, Dwelling			
ID0097	Demolition(Dwelling Unit - Demolition (1480))	Demolition-Sunset Gardens		\$155,000.00
	MAGNA, ACADEMY PARK AND HUNTER (UT003000004)			\$25,000.00
ID0073	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc, Dwelling Unit-Exterior (1480)-Carports -Surface Garage, Dwelling Unit-Exterior (1480)-Exterior Doors, Dwelling Unit-Exterior (1480)-Exterior Lighting, Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking, Dwelling Unit-Exterior (1480)-Gutters - Downspouts, Dwelling Unit-Exterior (1480)-Other, Dwelling Unit-Exterior (1480)-Roofs, Dwelling Unit-Exterior (1480)-Siding, Dwelling Unit-Exterior (1480)-Soffits, Dwelling Unit-Exterior (1480)-Windows, Dwelling Unit-Interior (1480)-Appliances, Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks, Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical), Dwelling Unit-Interior (1480)-Commodes, Dwelling Unit-Interior (1480)-Electrical, Dwelling Unit-Interior (1480)-Flooring (non routine), Dwelling Unit-Interior (1480)-Interior Doors, Dwelling Unit-Interior (1480)-Interior Painting (non routine), Dwelling Unit-Interior (1480)-Kitchen Cabinets, Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets, Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Other, Dwelling Unit-Interior (1480)-Plumbing, Dwelling Unit-Interior (1480)-Tubs and Showers, Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving, Dwelling Unit-Site Work (1480)-Curb and Gutter, Dwelling Unit-Site Work (1480)-Fencing, Dwelling Unit-Site Work (1480)-Landscape, Dwelling Unit-Site Work (1480)-Lighting, Dwelling Unit-Site Work (1480)-Parking, Dwelling Unit-Site Work (1480)-Seal Coat, Dwelling Unit-Site Work (1480)-Storm Drainage, Dwelling Unit-Site Work (1480)-Striping, Dwelling Unit-Site Work (1480)-Water	Physical Improvements to Dwellings		\$25,000.00

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2577-0274  
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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year      2                                  2022				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$430,612.00
ID0081	Management Improvements(Management Improvement (1408)-System Improvements,Management Improvement (1408)-Staff Training)	Improvements to Central Office IT systems & Training activities		\$10,000.00
ID0085	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration of Capital Fund		\$140,203.00
ID0089	Operations(Operations (1406))	Operations Costs		\$280,407.00
ID0098	RAD-CFP(RAD (1503))	RAD-CFP		\$1.00
ID0099	RAD-Investment Activity(RAD Investment Activity (1504))	RAD-Investment Activity		\$1.00
	Subtotal of Estimated Cost			\$1,402,034.00

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U.S. Department of Housing and Urban Development  
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2577-0274  
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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 3 2023				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	VALLEY FAIR VILLAGE (UT003000002)			\$278,987.00
ID0066	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water Lines/Mains)	Physical Improvements to Dwellings		\$278,987.00
	ERIN MEADOWS (UT003000003)			\$684,145.00
ID0070	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Stairwells - Fire Escapes,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-	Physical improvements to dwellings		\$684,145.00



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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 3 2023				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Unit-Interior (1480)-Flooring (non routine), Dwelling Unit-Interior (1480)-Interior Doors, Dwelling Unit-Interior (1480)-Interior Painting (non routine), Dwelling Unit-Interior (1480)-Kitchen Cabinets, Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets, Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Other, Dwelling Unit-Interior (1480)-Plumbing, Dwelling Unit-Interior (1480)-Tubs and Showers, Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving, Dwelling Unit-Site Work (1480)-Curb and Gutter, Dwelling Unit-Site Work (1480)-Fencing, Dwelling Unit-Site Work (1480)-Landscape, Dwelling Unit-Site Work (1480)-Lighting, Dwelling Unit-Site Work (1480)-Parking, Dwelling Unit-Site Work (1480)-Pedestrian paving, Dwelling Unit-Site Work (1480)-Seal Coat, Dwelling Unit-Site Work (1480)-Striping, Dwelling MAGNA, ACADEMY PARK AND HUNTER (UT003000004)			\$25,000.00
ID0074	Physical Improvements including Force Account (Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc, Dwelling Unit-Exterior (1480)-Carports -Surface Garage, Dwelling Unit-Exterior (1480)-Exterior Doors, Dwelling Unit-Exterior (1480)-Exterior Lighting, Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking, Dwelling Unit-Exterior (1480)-Gutters - Downspouts, Dwelling Unit-Exterior (1480)-Other, Dwelling Unit-Exterior (1480)-Roofs, Dwelling Unit-Exterior (1480)-Siding, Dwelling Unit-Exterior (1480)-Soffits, Dwelling Unit-Exterior (1480)-Windows, Dwelling Unit-Interior (1480)-Appliances, Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks, Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical), Dwelling Unit-Interior (1480)-Commodes, Dwelling Unit-Interior (1480)-Electrical, Dwelling Unit-Interior (1480)-Flooring (non routine), Dwelling Unit-Interior (1480)-Interior Doors, Dwelling Unit-Interior (1480)-Interior Painting (non routine), Dwelling Unit-Interior (1480)-Kitchen Cabinets, Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets, Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Other, Dwelling Unit-Interior (1480)-Plumbing, Dwelling Unit-Interior (1480)-Tubs and Showers, Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving, Dwelling Unit-Site Work (1480)-Curb and Gutter, Dwelling Unit-Site Work (1480)-Fencing, Dwelling Unit-Site Work (1480)-Landscape, Dwelling Unit-Site Work (1480)-Lighting, Dwelling Unit-Site Work (1480)-Parking, Dwelling Unit-Site Work (1480)-Seal Coat, Dwelling Unit-Site Work (1480)-Storm Drainage, Dwelling Unit-Site Work (1480)-Striping, Dwelling Unit-Site Work (1480)-Water AUTHORITY-WIDE (NAWASD)	Physical Improvements to Dwellings		\$25,000.00
				\$413,902.00

Form HUD-50075.2(4/2008)

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 4 2024				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	ERIN MEADOWS (UT003000003)			\$684,145.00
ID0071	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Stairwells - Fire Escapes,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping,Dwelling	Physical improvements to dwellings		\$684,145.00
	AUTHORITY-WIDE (NAWASD)			\$413,902.00
ID0083	Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	Improvements to Central Office IT systems & Training activities		\$10,000.00

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 4 2024				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0087	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration of Capital Fund		\$134,634.00
ID0091	Operations(Operations (1406))	Operations Costs		\$269,268.00
	VALLEY FAIR VILLAGE (UT003000002)			\$278,987.00
ID0103	Copy of Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-	Physical Improvements to Dwellings		\$278,987.00
	MAGNA, ACADEMY PARK AND HUNTER (UT003000004)			\$25,000.00



Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
02/28/2022

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 4 2024				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0104	Copy of Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Storm Drainage,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water Lines/Mains,Dwelling Unit-Site Work (1480)-	Physical Improvements to Dwellings		\$25,000.00
	Subtotal of Estimated Cost			\$1,402,034.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
02/28/2022

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 5 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	VALLEY FAIR VILLAGE (UT003000002)			\$278,987.00
ID0067	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water Lines/Mains)	Physical Improvements to Dwellings		\$278,987.00
	MAGNA, ACADEMY PARK AND HUNTER (UT003000004)			\$25,000.00
ID0075	Physical Improvements including Force Account(Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Storm Drainage,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water Lines/Mains,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-	Physical Improvements to Dwellings		\$25,000.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
02/28/2022

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 5 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors)			
	AUTHORITY-WIDE (NAWASD)			\$413,902.00
ID0100	Operations(Operations (1406))	Operations		\$269,268.00
ID0101	Management Improvement(Management Improvement (1408)-Empowerment Activities,Management Improvement (1408)-Equal Opportunity,Management Improvement (1408)-Other,Management Improvement (1408)-RMC Costs,Management Improvement (1408)-Security Improvements (not police or guard-non-physical),Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	Management Improvement		\$10,000.00
ID0102	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration		\$134,634.00
	ERIN MEADOWS (UT003000003)			\$684,145.00
ID0105	Copy of Physical Improvements including Force Account(Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-	Physical improvements to dwellings		\$684,145.00

Form HUD-50075.2(4/2008)



Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
02/28/2022

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 1 2021	
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Management Improvements(Management Improvement (1408)-System Improvements,Management Improvement (1408)-Staff Training)	\$10,000.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$134,634.00
Operations(Operations (1406))	\$269,268.00
Subtotal of Estimated Cost	\$413,902.00

## Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
02/28/2022

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year	2022
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Management Improvements(Management Improvement (1408)-System Improvements,Management Improvement (1408)-Staff Training)	\$10,000.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$140,203.00
Operations(Operations (1406))	\$280,407.00
RAD-CFP(RAD (1503))	\$1.00
RAD-Investment Activity(RAD Investment Activity (1504))	\$1.00
Subtotal of Estimated Cost	\$430,612.00

# Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
02/28/2022

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year    3    2023	
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	\$10,000.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$134,634.00
Operations(Operations (1406))	\$269,268.00
Subtotal of Estimated Cost	\$413,902.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
02/28/2022

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 4 2024	
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	\$10,000.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$134,634.00
Operations(Operations (1406))	\$269,268.00
Subtotal of Estimated Cost	\$413,902.00



# Capital Fund Program - Five-Year Action Plan

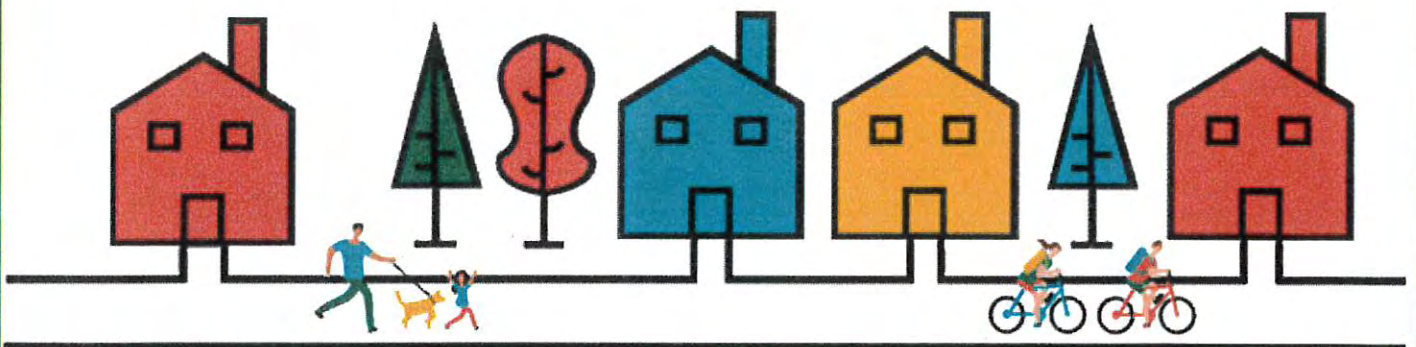
U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
02/28/2022

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year	5 2025
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Operations(Operations (1406))	\$269,268.00
Management Improvement(Management Improvement (1408)-Empowerment Activities,Management Improvement (1408)-Equal Opportunity,Management Improvement (1408)-Other,Management Improvement (1408)-RMC Costs,Management Improvement (1408)-Security Improvements (not police or guard-non-physical),Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	\$10,000.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$134,634.00
Subtotal of Estimated Cost	\$413,902.00

# Public Hearing Minutes

## Housing Connect

July 1, 2022—June 30, 2023





**MINUTES OF THE HOUSING CONNECT ANNUAL PHA PLAN  
PUBLIC HEARING**

**Wednesday, March 4, 2022, 10:00 a.m.**

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**HOUSING CONNECT:**

Mike Kienast – Chief Operations Officer  
Marni Timmerman – Moving To Work Director  
Dan Pincock – Executive Administrator

**PUBLIC:**

(none)

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The Public Hearing for Housing Connect's Annual PHA Plan for 2022-2023 commenced at 10:00 a.m. on Friday, March 4, 2022. In order to protect the public and Housing Connect staff due to the COVID-19 pandemic, the meeting was held virtually.

Housing Connect Chief Operations Officer Mike Kienast, Moving To Work Director Marni Timmerman, and Executive Administrator Dan Pincock were in attendance.

No members of the public attended the hearing. Housing Connect did not receive any written or other comments about the Plan from the public.

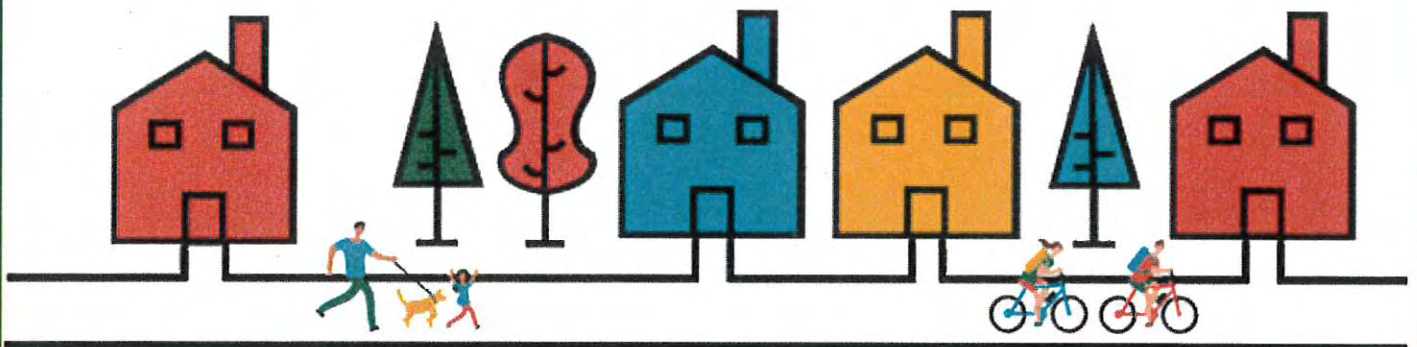
Respectfully submitted,

Dan Pincock  
Executive Administrator

# Adoption of PHA Plan by Board

## Housing Connect

July 1, 2022—June 30, 2023







## RESOLUTION #1055

### 2022-2023 ANNUAL PUBLIC HOUSING AGENCY (PHA) PLAN

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WHEREAS, Housing Connect has approved the 2022-2023 annual agency plan; and

WHEREAS, a public hearing was held on Friday, March 4, 2022, in order to obtain public comments, and the Resident Advisory Board has approved the 2022-2023 annual agency plan:

NOW, THEREFORE, Be It Resolved by the Commissioners of Housing Connect as follows:

Section 1. That the 2022-2023 annual agency plan be approved;

Section 2. That this resolution become effective for Housing Connect from July 1, 2022 to June 30, 2023.

Dated this 16<sup>th</sup> day of March, 2022.

DocuSigned by:

*Spencer Moffat*

0B0B4F0F4B0440A...

Spencer Moffat, Chair

*Janice Kimball*

Janice Kimball, Chief Executive Officer

# U. S. Department of Housing and Urban Development

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Office of Public Housing

Region VIII, Denver  
1670 Broadway Street  
Denver, Colorado 80202-4801

Phone: 303-672-5372  
Fax: 303-672-5065  
Web: [www.hud.gov](http://www.hud.gov)

August 3, 2022

## **VIA Electronic Mail**

Ms. Janice Kimball  
Executive Director  
Housing Connect  
3595 South Main Street  
Salt Lake City, UT 84115  
[jjkimball@hacsl.org](mailto:jjkimball@hacsl.org)

Re: PHA Plan Approval

Dear Ms. Kimball:

This letter is to inform you that the Housing Connect (HC) Annual PHA Plan and Moving to Work (MTW) Supplement for the Fiscal Year 7/01/2022 – 6/30/2023<sub>2</sub> is conditionally approved.

The Department of Housing and Urban Development is still reviewing the Agency-Specific Waiver and Safe Harbor Waiver requests submitted as part of Housing Connect's Moving to Work (MTW) Supplement to its Fiscal Year beginning 7/01/22. You will receive a response in a separate letter.

The following waivers remain under review:

### **AGENCY-SPECIFIC WAIVER REQUEST:**

Alternative Verification Hierarchy

### **SAFE HARBOR WAIVER REQUESTS:**

Alternative Reexamination Schedule for Households Activities

Self-Certification of Assets Activities

Elimination of PBV Selection Process (HCV) Activity

The Department's approval of this MTW Supplement to the PHA Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act as outlined by the MTW Operations Notice. In providing assistance to families under programs covered by this MTW Supplement to the PHA Plan, your PHA must comply with the rules, standards, and policies established in the MTW Supplement to the PHA Plan as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Operations Notice.

Documents relying upon the approved PHA Plan and MTW Supplement (i.e., Administrative Plan, Admission and Continued Occupancy Plan, etc.) should be updated to reflect those policies. Also, the approved PHA Plan and all required attachments and documents should be available for review and inspection at the PHA's principal office during normal business hours.

Should you have any questions or if we may be of further assistance, please contact Bob Koenen, Portfolio Management Specialist, at [bob.e.koenen@hud.gov](mailto:bob.e.koenen@hud.gov) or 303-672-5238.

Sincerely,

10/4/2022

X



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Christine Smith Dreier

Division Director

Signed by: CHRISTINE SMITH-DREIER

CC: Marianne Nazzaro, MTW Program Director  
Autumn Gold, MTW Desk Officer

# U. S. Department of Housing and Urban Development

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Office of Public Housing

Region VIII, Denver  
1670 Broadway Street  
Denver, Colorado 80202-4801

Phone: 303-672-5372  
Fax: 303-672-5065  
Web: [www.hud.gov](http://www.hud.gov)

November 9, 2022

## **VIA Electronic Mail**

Ms. Janice Kimball  
Executive Director  
Housing Connect  
3595 South Main Street  
Salt Lake City, UT 84115  
[jjkimball@hacsl.org](mailto:jjkimball@hacsl.org)

Re: Approval of Housing Connect's Moving to Work Supplement to the 07/01/2022 Annual PHA Plan Agency Specific and Safe Harbor Waivers.

Dear Ms. Kimball:

The Department of Housing and Urban Development has completed its review of the Agency Specific and Safe Harbor Waiver requests submitted as part of Housing Connect's Moving to Work (MTW) Supplement to its Fiscal Year beginning 07/01/2022 Annual PHA Plan approved on August 3, 2022.

This letter is to inform you that the waiver requests listed below are approved. Your agency is free to move forward with the implementation of the activity described in the MTW Supplement to the PHA Plan.

### **AGENCY-SPECIFIC WAIVER REQUEST:**

Enterprise Income Verification (EIV) Verification Hierarchy

### **SAFE HARBOR WAIVER REQUESTS:**

Alternative Reexamination Schedule for Households Activities 3.a.ii. and 3.b.ii.  
Self-Certification of Assets Activities 3.c.i. and 3.d.i.

The waiver request listed below was deemed ineligible. Per the Operations Notice - Safe harbors marked with an asterisk (\*) cannot be waived through the Safe Harbor Waiver process.

### **SAFE HARBOR WAIVER REQUEST:**

Elimination of PBV Selection Process (HCV) Activity 9.c.iii.

The Department's approval of this MTW Supplement to the PHA Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions



of the 1937 Act as outlined by the MTW Operations Notice. In providing assistance to families under programs covered by this MTW Supplement to the PHA Plan, your PHA must comply with the rules, standards, and policies established in the MTW Supplement to the PHA Plan as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Operations Notice.

Documents relying upon the approved PHA Plan and MTW Supplement (i.e., Administrative Plan, Admission and Continued Occupancy Plan, etc.) should be updated to reflect those policies. Also, the approved PHA Plan and all required attachments and documents should be available for review and inspection at Housing Connect's principal office during normal business hours.

Should you have any questions or if we may be of further assistance, please contact Bob Koenen, Portfolio Management Specialist, at [bob.e.koenen@hud.gov](mailto:bob.e.koenen@hud.gov) or 303-672-5238.

Sincerely,

11/9/2022

X



---

Christine Smith Dreier  
Division Director

Signed by: CHRISTINE SMITH-DREIER

CC: Marianne Nazzaro, MTW Program Director  
Autumn Gold, MTW Desk Officer



📍 3595 South Main Street,  
Salt Lake City, UT 84115

🌐 [www.housingconnect.org](http://www.housingconnect.org)

📞 O: 801-284-4400  
TDD: 801-284-4407  
F: 801-284-4406  
Reasonable Accommodations:  
801-284-4439

**Moving To Work (MTW) DRAFT-Supplement to Annual PHA Plan  
Fiscal Year 2022-2023  
Submitted: 6/7/22  
Approved:**

Housing Connect (HC) is requesting public review and comment on HC's Fiscal Year 2022-2023 Moving To Work (MTW) Supplement to the Annual PHA Plan and related policy materials. The MTW Supplement also includes a proposed Agency-Specific Waiver and three Safe Harbor Waivers. The public comment period will extend from March 22, 2022 through May 5, 2022. The following documents comprise the MTW Supplement and are included herein:

1. MTW Supplement (HUD Form 50075-MTW)
2. Stepped Rent Hardship Policy
3. Agency-Specific Waiver Request: Alternative Verification Hierarchy
4. Safe Harbor Waiver Request: Alternative Reexamination Schedule for Households Activities 3.a. & 3.b.
5. Safe Harbor Waiver Request: Self-Certification of Assets Activities 3.c. & 3.d.
6. Safe Harbor Waiver Request: Elimination of PBV Selection Process (HCV) Activity 9.c.
7. Quality Assurance Method: Rent Reasonableness Activity 2.d.
8. Quality Assurance Method: Third-Party Requirement Activity 5.c.
9. Proposed Stepped Rents
10. Impact Analysis (Stepped Rent, Alternative Utility Allowance)
11. Public Comment & Action
12. Certifications of Compliance

# 1. MTW Supplement (HUD Form 50075-MTW)

**PHA Name :** Salt Lake County (Housing Connect)

**PHA Code :** UT003

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 7/1/2022

**PHA Program Type:** Combined

**MTW Cohort Number:** Stepped and Tiered Rent

**MTW Supplement Submission Type:** Annual Submission



## **B. MTW Supplement Narrative.**

The Housing Authority of the County of Salt Lake dba Housing Connect (HC) is committed to MTW's 3 statutory objectives of achieving greater cost effectiveness in federal expenditures, increasing self-sufficiency and increasing housing choice for low-income families. MTW flexibility will support our agency mission to connect people and communities to quality affordable housing opportunities while promoting self-sufficiency and neighborhood revitalization.

Housing Connect will implement activities to further this mission and support the 3 statutory objectives as well over the course of its 20 year term of participation in the MTW program. Long term plans as well as short-term plans and outcomes will be described in MTW Supplements to the PHA Annual Plan and 5 Year Plan. Housing Connect has a strong and dedicated Board, competent staff along with invested Stakeholders in our community to guide and support new initiatives. Most importantly is the role of current residents; through regular feedback meetings with residents and our Resident Advisory Board we will continue to seek input and suggestions to guide our successes.

To begin Aug 1, 2022 Housing Connect will implement a stepped rent policy for qualified Housing Choice Voucher (HCV) and Public Housing (PH) households. The rent policy will increase the family's rent payment/TTP on a fixed schedule in both frequency and amount. The fixed schedule/stepped rent policy will be disaggregated from family income allowing a family to keep more of their increased income therefore giving incentives to working families and providing opportunities to increase their self-sufficiency. One component of the rent model will include a triennial re-examination schedule. This change along with streamlining paperwork and functions where feasible will better utilize federal dollars.

Some of the functions Housing Connect plans to simplify or streamline include a simplified utility allowance, a self-certification of assets up to \$50,000, and increased flexibility to streamline income verification. These changes will provide transparency for households and reduce administrative cost and time.

Housing Connect plans to implement the pre-qualification of unit inspections for up to 90 days of a participant occupying a unit, and plans to perform HQS inspections on PBV units that it owns, manages, and/or controls. Housing Connect's goal is to increase cost effectiveness by expediting the lease-up process. This change will free up staff time so that there are additional resources available to focus on cost effectiveness measures, self-sufficiency efforts, and increasing household's housing choice.

To increase cost effectiveness, HC will eliminate the selection process in the award of PBVs to properties owned by Housing Connect that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. This process will increase efficiency resulting in cost effectiveness. HC will use its expanded ability to increase the project-base voucher cap in order to spur development of Permanent Supportive Housing (PBV) properties and increase housing in underserved parts of Salt Lake County (SLCO), including areas of opportunity.

Housing Connect understands that self-sufficiency looks different for each household. HC ensures residents can maintain assisted housing and have support and resources to successfully move out of assisted housing where appropriate. HC plans to modify its Family Self-Sufficiency program and give increased incentives to families whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

Housing Connect is excited to have the opportunity to partner with HUD to implement innovative ways to best serve our local community.

**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).**

<b>1. Tenant Rent Policies</b>	
c. Stepped Rent (PH)	Plan to Implement in the Submission Year
d. Stepped Rent (HCV)	Plan to Implement in the Submission Year
i. Alternative Utility Allowance (PH)	Plan to Implement in the Submission Year
j. Alternative Utility Allowance (HCV)	Plan to Implement in the Submission Year
<b>2. Payment Standards and Rent Reasonableness</b>	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
<b>4. Landlord Leasing Incentives</b>	
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
<b>6. Short-Term Assistance</b>	
<b>7. Term-Limited Assistance</b>	
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
d.PH Modify or Eliminate the Contract of Participation (PH)	Plan to Implement in the Submission Year
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Plan to Implement in the Submission Year
e.PH Policies for Addressing Increases in Family Income (PH)	Plan to Implement in the Submission Year
e.HCV Policies for Addressing Increases in Family Income (HCV)	Plan to Implement in the Submission Year
<b>11. MTW Self-Sufficiency Program</b>	
<b>12. Work Requirement</b>	
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	
c. Housing Development Programs	Plan to Implement in the Submission Year

**C. MTW Activities Plan that Salt Lake County (Housing Connect) Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.c. - Stepped Rent (PH)</b>	
As part of the cohort-specific Rent Reform study, Housing Connect will implement a stepped rent model for qualified Public Housing (PH) households as outlined by HUD in the Stepped Rent Policy. The rent model will increase the family's rent payment/TTP on a fixed schedule in both frequency and amount. The fixed schedule/stepped rent model will be disaggregated from family income allowing a family to keep more of their increased income therefore giving incentives to working families and providing opportunities to increase their self-sufficiency.	

<p>This MTW activity serves the following statutory objectives:</p> <p>Cost effectiveness</p> <p>Self-sufficiency</p>
<p>This MTW activity serves the following statutory objectives:</p> <p>Neutral (no cost implications)</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 only to a subset or subsets of assisted households</p>
<p>This MTW activity applies to:</p> <p>New admissions and currently assisted households</p>
<p>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).</p> <p>The MTW activity applies only to selected family types</p>
<p>This MTW activity applies to the following Public Housing developments: Harmony Park Apts (South Main)</p> <p>Union Plaza</p> <p>Midvale Solar (Sunset Gardens)</p> <p>Erin Meadows</p> <p>Granger Apartments</p>
<p>n/a</p>
<p>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</p>
<p>Attached Hardship policy applies to: 1.c. - Stepped Rent (PH)</p> <p>1.d. - Stepped Rent (HCV)</p> <p>3.a. - Alternative Reexamination Schedule for Households (PH)</p> <p>3.b. - Alternative Reexamination Schedule for Households (HCV)}</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency</p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
<p>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</p>
<p>The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:</p> <p>1.c. - Stepped Rent (PH)</p> <p>1.d. - Stepped Rent (HCV)</p> <p>3.a. - Alternative Reexamination Schedule for Households (PH)</p> <p>3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p>The Stepped Rent policy will increase tenant rents annually by an amount unrelated to each household's income. The annual stepped rent increase will be a specific dollar amount, by unit size. Housing Connect plans to set rent increases at 2% of Fair Market Rent based on unit size and leave it fixed for the 6-year study period. For households with 5 bedrooms and larger subsidies, Housing Connect will have an annual step increase of less than 2% of FMR to accommodate larger households and prevent a negative financial impact.</p> <p>Housing Connect's annual step increases are as follows:</p> <p>0 Bedroom: \$19</p> <p>1 Bedroom: \$23</p> <p>2 Bedroom: \$27</p> <p>3 Bedroom: \$37</p> <p>4 Bedroom: \$42</p> <p>5+ Bedroom: \$48</p> <p>Current households will start out paying rent equal to 30% of their total retrospective annual adjusted income or a minimum rent of \$50 (whichever is larger). After year 1, each household's rent will increase by the established amount (with exceptions for hardships).</p> <p>New admission households will start out paying rent equal to 30 percent of their total current adjusted income or a minimum rent of \$50 (whichever is larger). After year 1, each household's rent will increase by the established amount (with exceptions for hardships). At the triennial income reexamination, Housing Connect will document household income and any changes in household composition. However, the triennial income reexamination will not affect the household's</p>

rent. A household will receive a hardship if their rent burden exceeds 40% of their current/anticipated total annual adjusted income and for other circumstances outlined in our Hardship Policy. The hardship rent will equal 40% of the household's current/anticipated total annual adjusted income. The hardship rent will last for 12 months and can be renewed as needed. More detail is available in our attached Hardship Policy.
If a Public Housing household's income is over the income limit at the first recertification following study enrollment or at a subsequent triennial eligibility check, the standard over-income procedures are triggered. PHA measures income the following year. Over-income rent rules supersede the stepped rent policy. The "last step" in public housing is when the household's TTP reaches the flat rent. Please see the attached stepped rent schedule.
If a household progresses all the way through the stepped rent schedule, Other\Not Applicable.
Standard over-income rules in PH will apply if the family is paying the flat rent at the end of the stepped rent schedule.

<b>1.d. - Stepped Rent (HCV)</b>
As part of the cohort-specific Rent Reform study, Housing Connect will implement a stepped rent model for qualified Housing Choice Voucher (HCV) households as outlined by HUD in the Stepped Rent Policy. The rent model will increase the family's rent payment/TTP on a fixed schedule in both frequency and amount. The fixed schedule/stepped rent model will be disaggregated from family income allowing a family to keep more of their increased income therefore giving incentives to working families and providing opportunities to increase their self-sufficiency.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
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 only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This MTW activity applies to the following housing choice voucher unit types: This MTW activity applies to the following housing choice voucher unit types: All tenant-based units and/or properties with project-based vouchers (PBVs) with the exception of PBVs in Permanent Supportive Housing (PSH). Households in PBVs in PSH require essential supportive services and have met specific eligibility criteria attached with the PBV. Details regarding eligibility criteria for Permanent Supportive Housing can be found in Housing Connect's Administrative Plan.
n/a
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
Attached Hardship policy applies to: 1.c. - Stepped Rent (PH) 1.d. - Stepped Rent (HCV) 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)}
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Salt Lake County (Housing Connect) 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.
The Impact Analysis that applies to this MTW activity also applies to the following MTW activities: 1.c. - Stepped Rent (PH) 1.d. - Stepped Rent (HCV) 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)



The Stepped Rent policy will increase tenant rents annually by an amount unrelated to each household's income. The annual stepped rent increase will be a specific dollar amount, by unit size. Housing Connect plans to set rent increases at 2% of Fair Market Rent based on unit size and leave it fixed for the 6-year study period. For households with 5 bedrooms and larger subsidies, Housing Connect will have an annual step increase of less than 2% of FMR to accommodate larger households and reduce a negative financial impact.

Housing Connect's annual step increases are as follows:

0 Bedroom: \$19  
1 Bedroom: \$23  
2 Bedroom: \$27  
3 Bedroom: \$37  
4 Bedroom: \$42  
5+ Bedroom: \$ 48

Current households will start out paying rent equal to 30% of their total retrospective annual adjusted income or a minimum rent of \$50 (whichever is larger). After year 1, each household's rent will increase by the established amount (with exceptions for hardships and triennial income reexaminations).

New admission households will start out paying rent equal to their total current adjusted income or a minimum rent of \$50 (whichever is larger). After year 1, each household's rent will increase by the established amount (with exceptions for hardships and triennial income reexaminations).

At the triennial income reexamination, Housing Connect will document household income and any changes in household composition. However, the triennial income reexamination will not affect the household's rent.

A household will receive a hardship if their rent burden exceeds 40% of their current/anticipated total adjusted income and for other circumstances outlined in our Hardship Policy. The hardship rent will equal 40% of the household's current/anticipated total annual adjusted income. The hardship rent will last for 12 months and can be renewed as needed. More detail is available in our attached Hardship Policy.

If an HCV household has zero HAP at the first recertification following study enrollment, normal zero-HAP procedures would apply. For subsequent triennial eligibility checks, if an HCV household's current gross income is over 120% of AMI, the household will be designated as zero-HAP. The household gets a 180 day zero HAP grace period. At the end of that grace period, the household exits the voucher program. However, if the zero-HAP rent (or a loss of income) causes a rent burden above 40% of current gross income, the household can request and receive a hardship. A hardship would halt the HCV termination process.

Please see the attached stepped rent schedule.

If a household progresses all the way through the stepped rent schedule  
Other\Not Applicable.

The stepped rent increases will end when a household's HAP reaches zero. At that point, the zero HAP procedure specified above would apply. If the family is not paying the full contract rent, they will continue to receive a subsidy.

#### 1.i. - Alternative Utility Allowance (PH)

Housing Connect proposes to modify the utility allowance by calculating by bedroom size as opposed to building type. The utility allowance will be calculated based on the number of bedrooms in the unit or the voucher size, whichever is lower. The change in calculation will simplify the process for households seeking housing options to determine if the unit is affordable and it will eliminate the processing burden for Housing Connect's staff of determining the utility allowance amount for a specific unit.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

This MTW activity serves the following statutory objectives:  
Decreased revenue

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

n/a

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency  
Received 0 hardship requests

Approved hardship requests  
Denied hardship requests  
There is\are hardship requests pending.

The utility allowance is based on utility surveys and analysis of the type of structure, bedroom size appliances provided by the tenant, and type of appliances (gas/electric). The simplified schedule is based on the analysis of data collected from HC's existing portfolio including the most common structure and utility types. This new utility allowance schedule will be used and implemented at new admission, change of unit, or upon the annual or triennial certification. HC has provided an impact analysis to demonstrate impact.

#### **1.j. - Alternative Utility Allowance (HCV)**

Housing Connect proposes to modify the utility allowance by calculating by bedroom size as opposed to building type. The utility allowance will be calculated based on the number of bedrooms in the unit or the voucher size, whichever is lower. The change in calculation will simplify the process for households seeking housing options to determine if the unit is affordable and it will eliminate the processing burden for Housing Connect's staff of determining the utility allowance amount for a specific unit.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

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

n/a

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency  
Received 0 hardship requests  
Approved hardship requests  
Denied hardship requests  
There is\are hardship requests pending.

The utility allowance is based on utility surveys and analysis of the type of structure, bedroom size appliances provided by the tenant, and type of appliances (gas/electric). The simplified schedule is based on the analysis of data collected from HC's existing portfolio including the most common structure and utility types. This new utility allowance schedule will be used and implemented at new admission, change of unit, or upon the annual or triennial certification. HC has provided an impact analysis to demonstrate impact.

#### **2.d. - Rent Reasonableness – Third-Party Requirement (HCV)**

HC will use MTW flexibility to eliminate the requirement for a third party to conduct rent reasonableness on HC-owned or HC-controlled units assisted with project-based or tenant-based vouchers. HC currently has a third party determine rent reasonableness on HC units, despite the fact that many of these units are subject to rent restrictions due to other funding sources such as RAD PBV rent restrictions. HC incurs cost and additional staff time to have these determinations done by a third party.

HC will be implementing this activity within the safe harbor limits established by the MTW Operations including the following: HC will establish and make available a quality assurance method to ensure impartiality. HC will make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area. As needed and by Department request, HC will obtain services of a third-party entity to determine rent reasonableness for PHA-owned units. This waiver is part of HC's overall goals to use MTW flexibility to streamline and reduce costs.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

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

n/a

No hardship were requested in the most recent fiscal year.

<p>In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency</p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
<p>Following will explain quality assurance method:</p> <p>For quality assurance, HC's rent reasonable process will include using rent comparables generated by the third party company AffordableHousing.com to identify comparable units. Rent reasonableness determinations will be performed by an HC staff person who is trained on HCV and PBV rent reasonableness regulations. To ensure the consistency and uniformity of these determined Rent Reasonables for a particular unit, HC supervisory staff shall perform quality control (QC) reviews on a random sample of completed Rent Reasonable's in accordance with the policies described in the Administrative Plan and consistent with SEMAP QC protocol. This process will be performed on all units including HC-owned or HC-controlled units assisted with project-based or tenant-based vouchers. and attached for quality assurance method</p>
<p>Following will explain rent reasonableness determination method:</p> <p>HC uses the third party company AffordableHousing.com (formerly GoSection8) to generate rent comparables for the HCV and PBV programs. The AffordableHousing.com software generates a minimum of 3 unassisted rent comparables for the subject unit, matching the unit characteristics and taking into account the location, size, type, quality, amenities, facilities, and the management and maintenance of each unit; this approach is similar to that used by property appraisers, and determines if the owner's requested rent is reasonable. A unit that does not meet Rent Reasonableness using the method above will be denied unless an adjustment is made to the rent amount in order to be subsidized. and attached for rent reasonableness determination method</p>

<b>3.a. - Alternative Reexamination Schedule for Households (PH)</b>
<p>Housing Connect plans to implement triennial reexaminations for non-elderly and non-disabled PH households in the test group for the stepped rent study. Triennial reexaminations will result in a reduction in staff collecting, verifying, and processing data. Streamlined reexaminations will also save tenants/participants time and cost in regards to complying with the annual recertification documentation requirements. The anticipated outcome from this change is that families will have an incentive to increase their income as they will be able retain 100% of their additional earnings versus paying 30% of those earnings towards rent. One component of the process will be adopting a Release of Information that extends the expiration date from 15 to 40 months to align with the timing of the triennial recertification/eligibility check vs. using form HUD-9886 that is only valid for 15 months. These processes will reduce administrative burden and increase cost effectiveness.</p>
<p>This MTW activity serves the following statutory objectives:</p> <p>Cost effectiveness</p> <p>Self-sufficiency</p>
<p>This MTW activity serves the following statutory objectives:</p> <p>Neutral (no cost implications)</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 only to a subset or subsets of assisted households</p>
<p>This MTW activity applies to:</p> <p>New admissions and currently assisted households</p>
<p>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).</p> <p>The MTW activity applies only to selected family types</p>
<p>This MTW activity applies to the following Public Housing developments: Harmony Park Apts (South Main)</p> <p>Union Plaza</p> <p>Midvale Solar (Sunset Gardens)</p> <p>Erin Meadows</p> <p>Granger Apartments</p>
<p>n/a</p>
<p>This MTW activity requires a Safe Harbor Waiver.</p> <p>The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).</p>
<p>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</p>
<p>Attached Hardship policy applies to: 1.c. - Stepped Rent (PH)</p> <p>1.d. - Stepped Rent (HCV)</p> <p>3.a. - Alternative Reexamination Schedule for Households (PH)</p>

3.b. - Alternative Reexamination Schedule for Households (HCV)}
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Salt Lake County (Housing Connect) 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.
The Impact Analysis that applies to this MTW activity also applies to the following MTW activities: 1.c. - Stepped Rent (PH) 1.d. - Stepped Rent (HCV) 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)
Recertification Schedule is Once every three years
Household may request 0 interim recertifications per year.
In accordance with policies established for the Rent Reform demonstration, families who are selected for the test group of the Stepped Rent policy will have triennial re-examinations. Changes in family/household circumstances under the alternative reexamination schedule will be addressed with the Stepped Rent Hardship Policy in lieu of an interim reexamination.

<b>3.b. - Alternative Reexamination Schedule for Households (HCV)</b>
Housing Connect plans to implement triennial reexaminations for non-elderly and non-disabled HCV households in the test group for the stepped rent study. Triennial reexaminations will result in a reduction in staff collecting, verifying, and processing data. Streamlined reexaminations will also save tenants/participants time and cost in regards to complying with the annual recertification documentation requirements. The anticipated outcome from this change is that families will have an incentive to increase their income as they will be able retain 100% of their additional earnings versus paying 30% of those earnings towards rent. One component of the process will be adopting a Release of Information that extends the expiration date from 15 to 40 months to align with the timing of the triennial recertification/eligibility check vs. using form HUD-9886 that is only valid for 15 months. These processes will reduce administrative burden and increase cost effectiveness.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
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 only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This MTW activity applies to the following housing choice voucher unit types: This MTW activity applies to the following housing choice voucher unit types: All tenant-based units and/or properties with project-based vouchers (PBVs) with the exception of PBVs in Permanent Supportive Housing (PSH). Households in PBVs in PSH require essential supportive services and have met specific eligibility criteria attached with the PBV. Details regarding eligibility criteria for Permanent Supportive Housing can be found in Housing Connect's Administrative Plan.
n/a
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
Attached Hardship policy applies to: 1.c. - Stepped Rent (PH) 1.d. - Stepped Rent (HCV) 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)}

No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Salt Lake County (Housing Connect) 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.
The Impact Analysis that applies to this MTW activity also applies to the following MTW activities: 1.c. - Stepped Rent (PH) 1.d. - Stepped Rent (HCV) 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)
Recertification Schedule is Once every three years
Household may request 0 interim recertifications per year.
In accordance with policies established for the Rent Reform demonstration, families who are selected for the test group of the Stepped Rent policy will have triennial re-examinations. Changes in family/household circumstances under the alternative reexamination schedule will be addressed with the Stepped Rent Hardship Policy in lieu of an interim reexamination.

<b>3.c. - Self-Certification of Assets (PH)</b>
Self-Certification of Assets will allow families to self-certify assets received up to \$50,000 at admission and recertification. Housing Connect will decrease the reporting burden on families by no longer requesting bank statements, or verifying stocks and bonds, \$50,000 or less. This change will also significantly reduce Housing Connect's staff administrative burden in collecting and processing data and eliminate the tenant/participant having to pay the bank charges for bank statements. This activity will allow for greater cost effectiveness.
This MTW activity serves the following statutory objectives: Cost effectiveness
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
n/a
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Salt Lake County (Housing Connect) 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.

<b>3.d. - Self-Certification of Assets (HCV)</b>
Self-Certification of Assets will allow families to self-certify assets received up to \$50,000 at admission and recertification. Housing Connect will decrease the reporting burden on families by no longer requesting bank statements, or verifying stocks and bonds, \$50,000 or less. This change will also significantly reduce Housing Connect's staff administrative burden in collecting and processing data and eliminate the tenant/participant having to pay the bank charges for bank statements. This activity will allow for greater cost effectiveness.
This MTW activity serves the following statutory objectives: Cost effectiveness
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



n/a
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Salt Lake County (Housing Connect) 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.

<b>5.a. - Pre-Qualifying Unit Inspections (HCV)</b>
Housing Connect plans to allow pre-qualifying unit inspections (also known as a pre-inspection) with the goal to increase cost effectiveness by expediting the lease-up process. The pre inspection will be conducted within 90 days of the participant occupying the unit. An interim inspection will be made available based on need/request and HQS standards will not be altered.
This MTW activity serves the following statutory objectives: Cost effectiveness 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
n/a
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Salt Lake County (Housing Connect) 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.

<b>5.c. - Third-Party Requirement (HCV)</b>
This waiver will allow Housing Connect (HC) to perform HQS inspections on PBV units that it owns, manages, and/or controls. All such inspections will be conducted using HQS standards found at 24 CFR 982.401. To ensure the consistent and uniform application of HQS standards, HC supervisory staff will conduct quality control inspections on a random sample of units in accordance with the Inspection Quality Assurance Method included as an attachment. Program participants may request an interim inspection by contacting HC in accordance with the policies described in the Administrative Plan. If requested by HUD, HC will obtain the services of a third-party entity to determine if HC owned units pass HQS. This activity helps support the HC goal to streamline program administration and promote timely lease-up of PBV units.
This MTW activity serves the following statutory objectives: Cost effectiveness
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
n/a
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The quality assurance method: Following will explain the quality assurance method – The included attachment will outline Housing Connect’s

quality assurance method.  
If [Upload file] options- Display 'Attached for quality assurance method'

#### **9.a. - Increase PBV Program Cap (HCV)**

Under this activity, Housing Connect plans to increase the number of authorized units that it project-bases to spur development of Permanent Supportive Housing (PBV) properties and increase housing choice in underserved parts of Salt Lake County, including areas of opportunity. Housing Connect plans to approve up to 35% of authorized HCV units to be project based.

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

n/a

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency  
Received 0 hardship requests  
Approved hardship requests  
Denied hardship requests  
There is\are hardship requests pending.

35.00% of total authorized HCV units will be authorized for project-basing.

#### **9.b. - Increase PBV Project Cap (HCV)**

Under this activity, HC may eliminate or raise the existing cap on the number of units within a project and allow up to 100% of units in a project to be placed under a PBV Housing Assistance Payments contract. HC may eliminate or raise the project cap for those PBV projects that the agency determines to be consistent with the goal of increasing housing choice for Housing Choice Voucher program participants. HC may eliminate or raise the project cap for projects located in Salt Lake County including but not limited to underserved areas and areas of opportunity. HC will continue to be subject to the applicable provisions of PIH Notice 2013-28 or successor notices. This activity supports the goal of increasing housing choice.

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

n/a

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency  
Received 0 hardship requests  
Approved hardship requests  
Denied hardship requests  
There is\are hardship requests pending.

#### **9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)**

Under this activity, Housing Connect will eliminate the selection process in the award of PBV's to properties owned by Housing Connect that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. Housing Connect's goal for this request is to increase cost effectiveness by eliminating this process and increase housing choice.

HC will be requesting a Safe Harbor Waiver for this activity for 9.c.iii. Please note that HC has requested a waiver under

5.c. that will allow HC to inspect PHA-owned PBV units. In the event that HUD determines that the 5.c. waiver does not apply to PBV units selected under 9.c.iii, HC is submitting this safe harbor waiver request to conform to the requirements of the Operations Notice and will be implementing this activity with all other safe harbor limits established by the MTW Operations Notice including: A subsidy layering review will be conducted, HC will complete site selection requirements and the property will be owned by a single-asset entity of the agency.

This MTW activity serves the following statutory objectives:  
Cost effectiveness  
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

n/a

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency  
Received 0 hardship requests  
Approved hardship requests  
Denied hardship requests  
There is\are hardship requests pending.

#### **10.d.PH - Modify or Eliminate the Contract of Participation (PH)**

HC intends to use MTW funds to enhance the existing Family Self-Sufficiency (FSS) Program. HC will employ a locally developed agreement/contract in lieu of the FSS Contract of Participation (COP) (HUD-52650) that codifies the terms of participation. These terms will encourage participation and successful completion of the program. Main tenets of the program or specific changes to be outlined in the local agreement include, but are not limited to:

- Eliminating the traditional FSS escrow calculation and replacing it with a Pay Points system, whereby participants earn escrow credits by completing goals, each of which has an escrow payment value. Pay points accrue on the first day of the month following verification of completion of an established milestone; For example, if a milestone was verified on February 15, the pay points would accrue on March 1;
- Revising the conditions for payment of escrow to reflect a certification from the head of household that the family is welfare free as well as verification that the contract lead has obtained suitable employment. Welfare free is defined as not receiving cash maintenance payments from Federal or state welfare programs. Food stamps will not be considered welfare assistance. The entire family must be welfare free;
- Establishing a work requirement for graduation from FSS which includes suitable employment. Suitable employment will be defined and agreed upon by the participant and HC at the onset of the contract and will reflect employment which is consistent with their Individual Training and Service Plan (ITSP);
- Preparing local versions of the Contract of Participation and Individual Training and Services Plans to reflect HC's FSS program enhancements and changes;
- Allowing re-enrollment one year after the first graduation; however, only allowing one additional reenrollment; so that a household may only participate in FSS a total of two times and;
- Providing that non-compliance with FSS program rules and/or termination from the HCV program will result in forfeiture of escrow.
- For households who qualify for biannual or triennial recertifications, an alternative contract expiration date may be implemented to account for the extended length of time between recertifications.

Current FSS participants will be given the option of completing their FSS COP under the traditional FSS program or converting their participation to the MTW Enhanced FSS program. Existing participants who convert to the MTW Enhanced FSS program will retain any previously accrued escrow.

Housing Connect will have all modifications outlined in an approved FSS Action Plan in accordance with 24 CFR 984.201. Housing Connect will be implementing this activity within the safe harbor limits established by the MTW operations notice.

This MTW activity serves the following statutory objectives:

Self-sufficiency
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
n/a
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

<b>10.d.HCV - Modify or Eliminate the Contract of Participation (HCV)</b>
<p>HC intends to use MTW funds to enhance the existing Family Self-Sufficiency (FSS) Program. HC will employ a locally developed agreement/contract in lieu of the FSS Contract of Participation (COP) (HUD-52650) that codifies the terms of participation. These terms will encourage participation and successful completion of the program. Main tenets of the program or specific changes to be outlined in the local agreement include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Eliminating the traditional FSS escrow calculation and replacing it with a Pay Points system, whereby participants earn escrow credits by completing goals, each of which has an escrow payment value. Pay points accrue on the first day of the month following verification of completion of an established milestone; For example, if a milestone was verified on February 15, the pay points would accrue on March 1;</li> <li>• Revising the conditions for payment of escrow to reflect a certification from the head of household that the family is welfare free as well as verification that the contract lead has obtained suitable employment. Welfare free is defined as not receiving cash maintenance payments from Federal or state welfare programs. Food stamps will not be considered welfare assistance. The entire family must be welfare free;</li> <li>• Establishing a work requirement for graduation from FSS which includes suitable employment. Suitable employment will be defined and agreed upon by the participant and HC at the onset of the contract and will reflect employment which is consistent with their Individual Training and Service Plan (ITSP);</li> <li>• Preparing local versions of the Contract of Participation and Individual Training and Services Plans to reflect HC's FSS program enhancements and changes;</li> <li>• Allowing re-enrollment one year after the first graduation; however, only allowing one additional reenrollment; so that a household may only participate in FSS a total of two times and;</li> <li>• Providing that non-compliance with FSS program rules and/or termination from the HCV program will result in forfeiture of escrow.</li> <li>• For households who qualify for biannual or triennial recertifications, an alternative contract expiration date may be implemented to account for the extended length of time between recertifications.</li> </ul> <p>Current FSS participants will be given the option of completing their FSS COP under the traditional FSS program or converting their participation to the MTW Enhanced FSS program. Existing participants who convert to the MTW Enhanced FSS program will retain any previously accrued escrow.</p> <p>Housing Connect will have all modifications outlined in an approved FSS Action Plan in accordance with 24 CFR 984.201. Housing Connect will be implementing this activity within the safe harbor limits established by the MTW operations notice.</p>
This MTW activity serves the following statutory objectives: Self-sufficiency
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
n/a

No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

<b>10.e.PH - Policies for Addressing Increases in Family Income (PH)</b>
HC plans to modify its Family Self-Sufficiency program and give increased incentives to families whose heads of household are working, seeking work, participating in job training, educational or other self-sufficiency milestones. Housing Connect will eliminate the traditional FSS escrow calculation and replace it with a Pay Points system, whereby participants earn escrow credits by completing goals, each of which has an escrow payment value.
Housing Connect has adopted the Social Determinants of Health as a core framework to focus current and future activities, initiatives, and housing development efforts. The Pay Points system prioritizes Housing Stability, Financial Health, Food Quality & Stability, Education Connection, Health Access & Connection, and Community Connection. Collectively, the priority determinants identify the holistic impact Housing Connect seeks to make for those served.
Housing Connect understands that self-sufficiency looks different for each household. HC ensures residents can maintain assisted housing and have support and resources to successfully move out of assisted housing where appropriate.
This MTW activity serves the following statutory objectives: Self-sufficiency
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
n/a
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
Following is how increased earnings is treated: Housing Connect's MTW Enhanced FSS program will eliminate the traditional FSS escrow calculation. Increases in income will not be factored into the escrow calculation and will not automatically result in escrow accrual. Instead, households will have the opportunity to earn escrow through the completion of program milestones called Pay Points. Households will earn cash incentives for achieving specific pre-established self-sufficiency milestones. Cash incentives will be held in an escrow account and will be available for interim disbursement or at the successful completion of the program.

<b>10.e.HCV - Policies for Addressing Increases in Family Income (HCV)</b>
HC plans to modify its Family Self-Sufficiency program and give increased incentives to families whose heads of household are working, seeking work, participating in job training, educational or other self-sufficiency milestones. Housing Connect will eliminate the traditional FSS escrow calculation and replace it with a Pay Points system, whereby participants earn escrow credits by completing goals, each of which has an escrow payment value.
Housing Connect has adopted the Social Determinants of Health as a core framework to focus current and future activities, initiatives, and housing development efforts. The Pay Points system prioritizes Housing Stability, Financial Health, Food Quality & Stability, Education Connection, Health Access & Connection, and Community Connection. Collectively, the priority determinants identify the holistic impact Housing Connect seeks to make for those served.
Housing Connect understands that self-sufficiency looks different for each household. HC ensures residents can maintain assisted housing and have support and resources to successfully move out of assisted housing where appropriate.
This MTW activity serves the following statutory objectives: Self-sufficiency
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
n/a
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
Following is how increased earnings is treated: Housing Connect's MTW Enhanced FSS program will eliminate the traditional FSS escrow calculation. Increases in income will not be factored into the escrow calculation and will not automatically result in escrow accrual. Instead, households will have the opportunity to earn escrow through the completion of program milestones called Pay Points. Households will earn cash incentives for achieving specific pre-established self-sufficiency milestones. Cash incentives will be held in an escrow account and will be available for interim disbursement or at the successful completion of the program.

<b>17.c. - Housing Development Programs</b>
Under this activity, HC may utilize MTW funding to acquire, renovate and/or build affordable housing units that are not public housing for low-income families including housing that meets HUD requirements for MTW "local, non-traditional housing" as defined in HUD PIH Notice 2011-45 or successor notices. HC may utilize this activity to provide gap financing (grants or loans) to affordable housing developments including, but not limited to, PBV developments, Low Income Housing Tax Credit developments and/or other eligible development activities, subject to approval by the HC Board of Commissioners. HC may expend MTW funds including Public Housing Operating or Capital Funds, Housing Assistance Payments and/or HCV Administrative Fee reserves on such activities provided that HC shall not expend more than 10% of its Housing Assistance Payments budget on local, non-traditional activities including this housing development activity.
In implementing this activity, HC shall: 1) ensure that families assisted meet the HUD definition of "low-income"; 2) comply with PIH Notice 2011-45 as applicable; 3) comply with Section 30 of the US Housing Act of 1937; and, 4) Competitively bid any MTW funding awarded through this activity to a third-party provider. HC has provided summary information on one potential project for funding under this activity; however other projects may also be considered subject to approval of the HC Board of Commissioners.
This activity supports the goals to increase housing choices for low-income households and to leverage additional funds for affordable housing development.
This MTW activity serves the following statutory objectives: Cost effectiveness Housing choice
This MTW activity serves the following statutory objectives: Neutral (no cost implications) Increased revenue
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
n/a
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Salt Lake County (Housing Connect) MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

**Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Sunset Gardens	New Construction	Gap Financing	89.00	89.00	0.00	71.00	18.00	0.00

**Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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**Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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**Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<b>Safe Harbor Waivers seeking HUD Approval:</b> Please see attached for Safe Harbor Waivers requested this year.

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<b>Agency-Specific Waiver(s) for HUD Approval:</b>  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.  Please see attached for Agency-Specific Waiver(s) requested this year.
<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b> MTW Agency does not have approved Agency-Specific Waivers

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	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.

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
2021	\$1,627,200	\$1,627,200	\$0	2021-12-31
2022				

<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> 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.	
<b>Income Level</b>		<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
80%-50% Area Median Income		
49%-30% Area Median Income		
Below 30% Area Median Income		
Total Local, Non-Traditional Households		<b>0</b>

\*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.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
MTW agency established a rent reform policy to encourage employment and self-sufficiency	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
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?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
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.	
No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver	

I.	Evaluations.
Yes - This table lists evaluations of Salt Lake County (Housing Connect)'s MTW activities, including the names of evaluators and available reports	

**Table I.1 - Evaluations of MTW Policies**

Title and short description	Evaluator name and contact information	Time period	Reports available
Stepped and Tiered Rent Demonstration. Housing Connect's participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce PHA administrative burdens. Housing Connect will be studying a Stepped Rent model. An independent research team lead by MDRC will work with HUD, Housing Connect, and the other selected PHAs to assist in implementation and evaluate the effects of the alternative rent policy.	James Riccio, Principal Investigator James.Riccio@mdrc.org	Evaluation will be conducted over a 6 year period: August 1, 2022-July 31, 2028	n/a



## 2. Stepped Rent Hardship Policy



**STEPPED RENT  
HARDSHIP POLICIES  
DATE: 8-8-2022**

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## HOUSING CONNECT MTW HARDSHIP POLICY

### GENERAL HARDSHIP POLICIES

The Stepped Rent policy is intended to benefit assisted households by allowing them to increase their income without a direct increase in their total tenant payment (TTP). The TTP will instead increase each year by a modest amount unrelated to the household's income. However, some households may need special accommodations to avoid negative consequences of the stepped rent.

Housing Connect (HC) has developed conditions-based hardship policies as described below to address and mitigate financial hardships which may occur at enrollment or at any time during tenancy or program participation. HC's general hardship policies are outlined below:

- HC will review its hardship policies with families during intake and recertification and will consider if a household qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity.
- There is no limit to the number of hardships that a household may receive.
- If a household is approved for a hardship, and subsequently experiences another adverse event while still in hardship status, they may request an additional hardship that might further reduce their TTP.
- If a household is approved for a hardship, they are not required to report subsequent income increases during the period of their approved hardship. Once HC approves a hardship, the hardship will not end early.
- If a household is approved for a temporary hardship, when that hardship is scheduled to expire the household will be notified and may request an extension. When a hardship expires, the household will return to paying the stepped rent, including any annual stepped rent increases that were scheduled to take effect during the hardship period.
- If the head of household, spouse, or co-head of household becomes elderly or disabled, the household is eligible to be excluded from the stepped rent and return to the traditional income-based rent policy.

This hardship policy presents eligibility criteria and remedies for different types of hardships. The different types of hardships below are not mutually exclusive. If a household's circumstances correspond to more than one type of hardship, they will receive the hardship most beneficial to them.

The table below identifies the hardship policy and the related Operations Notice waiver which requires establishment of a hardship policy.

### HARDSHIP POLICY APPLICABILITY TABLE

No	Hardship Policy	Treatment *	Control **	Excluded ***	Waivers
1.	Hardship Process	X	X	X	
2.	Rent Burden Hardship at Enrollment	X			1c 1d
3.	Rent Burden Hardship after Enrollment	X			1c 1d

No	Hardship Policy	Treatment *	Control **	Excluded ***	Waivers
4.	Stepped Rent Reset for Sustained Hardships	X			1c 1d
5.	Full-Time Student Hardship	X			1c 1d
6.	Alternative Verification Hierarchy	X	X	X	Agency Specific
7.	Other Hardship	X			N/A

**\* Treatment Group:** Non-elderly, non-disabled households who were not excluded and who were *randomly selected to have their rent calculated using the Stepped Rent method. This includes randomly selected existing participants as well as randomly selected new admissions during the initial enrollment period.*

**\*\* Control Group:** Non-elderly, non-disabled households who were not excluded and who were randomly selected to have their rent calculated in accordance with standard Housing Choice Voucher and Public Housing program regulations

**\*\*\* Excluded Group:** All elderly, disabled, traditional FSS, households with special purpose vouchers and households who become or will become elderly or disabled during the 6-year demonstration. Where special purpose vouchers are concerned, HC will apply MTW policies to the extent that such policies are not in conflict with the applicable NOFA. In the event of a conflict, the NOFA will govern.

## HARDSHIP PROCESS

Households who request a hardship will be subject to the hardship process outlined below.

- With the exception of automatic hardship processed by HC, during the income certification that takes place at enrollment, hardship requests must be made in writing.
- When a household makes a written request for a hardship exemption from a required MTW activity, HC will request verification of the hardship. When a household submits a valid hardship request, the HC will suspend the MTW activity for the household, beginning the next month after the request, until the HC has determined if the hardship request is warranted
- The hardship TTP will be calculated consistent with applicable HC hardship policies.
- HC will retain records of all hardship requests received and the results of these requests and supply them at HUD's request. HC will retain this information for the duration of HC's participation in the MTW demonstration program and make such information available for public review and inspection at HC's principal office during normal business hours.
- If a hardship request is denied, HC will provide the household with an opportunity to request an informal review/hearing for a second level review of the denied hardship request.
- Approved hardship rents will remain in place for a twelve-month period at which time the household must reapply for hardship. If the household does not reapply or is not approved for a continued hardship, the rent will revert back to the pre-hardship stepped rent TTP, plus any annual stepped rent TTP increases that were scheduled to take effect during the hardship period.

## RENT BURDEN HARDSHIP AT ENROLLMENT

For households already receiving assistance, HC conducts an income examination at the time of enrollment in the Stepped Rent program. HC will compare the household's current adjusted income with their prior year/retrospective adjusted income. If the household's current adjusted income is lower than



their prior/retrospective adjusted income, HC will automatically determine whether the household is eligible for a temporary hardship exemption.

**Request:**

- Hardship requests do not need to be made at enrollment. HC will automatically determine if a hardship, due to a decrease in income exists.

**Eligibility:**

- A household will be eligible for this hardship if, at enrollment, the household's current adjusted income is lower than their prior/retrospective adjusted income and their rent burden exceeds 40% (stepped rent total tenant payment divided by current adjusted monthly income)

**Remedy:**

- The household's TTP will be set at 40% of their current adjusted monthly income or the minimum rent, whichever is greater

**Time Frame:**

- The hardship will remain in place for a twelve-month period.
- At the end of that twelve-month period, if the household requests that the hardship be extended and the verified hardship condition continues to exist, HC will reset the household's stepped rent and the hardship will end.
- If the household does not reapply for the hardship or is not approved for a stepped rent reset, the stepped rent will revert back to the pre-hardship stepped rent TTP plus any annual stepped rent increases that were scheduled to take effect during the hardship period.

**Example #1: Rent Burden at Enrollment – Decrease in Income – Qualifies for Hardship**

This household, at enrollment in Stepped Rent, has a prior yr./retrospective adjustment income of \$12,000. They had no applicable deductions. One of the household members lost a job and the household is now reporting a current adjusted income of \$5,000. The household qualifies for the temporary hardship because the rent burden exceeds 40%. The calculations are outlined below and reflect income and expenses at the time of enrollment into Stepped Rent.

- Prior/ Retrospective Adjusted Income: \$12,000
- Stepped Rent TTP based on Prior/Retrospective Adjusted Income: \$300
  - $\$12,000 / 12 = \$1,000$  is the adjusted monthly income
  - $\$1,000 \times 30\% = \$300$
- Current Annual Adjusted Income: \$5,000
- Current Monthly Adjusted Income: \$417
  - Current annual adjusted income divided by 12
  - $\$5,000 / 12 = \$417$
- Rent Burden: 72%:
  - Stepped rent TTP divided by current monthly adjusted income
  - $\$300 / 417 = 72\%$
- Household qualifies for hardship: The household is rent burdened.
- Hardship TTP: \$167
  - 40% of current monthly adjusted income
  - $\$417 \times 40\% = \$167$

## RENT BURDEN HARDSHIP AFTER ENROLLMENT

Households already receiving assistance under Stepped Rent will be eligible for a temporary hardship TTP if the stepped rent causes a rent burden of 40% or higher. This hardship may be due to a decrease in income, an increase in eligible deductions or the annual stepped rent increase.

### Request:

- A hardship due to rent burden must be requested, in writing, by the household.

### Eligibility:

- A household will be eligible for this hardship exemption if their rent burden (total tenant payment divided by their current adjusted monthly income) exceeds 40%.
- Rent burden may be the result of a decrease in income, an increase in eligible deductions or may be due to the application of annual stepped rent increases.
- This hardship would not apply to households with seasonal income as the income calculation for seasonal income takes into account periods of unemployment.

### Remedy:

- The household's hardship TTP will be set at 40% of their current adjusted monthly income or the minimum rent, whichever is greater

### Time Frame:

- The hardship will remain in place for a twelve-month period.
- At the end of that twelve-month period, if the household requests that the hardship be extended and the verified hardship condition continues to exist, HC will reset the household's stepped rent and the hardship will end. Rent reset, as a result of continued hardship, is based upon verification that the household meets the 40% rent burdened threshold.
- If the household does not reapply for the hardship or is not approved for a stepped rent reset, the stepped rent will revert back to the pre-hardship stepped rent TTP plus any annual stepped rent increases that were scheduled to take effect during the hardship period.

### Example #2: Rent Burden - Decrease in Income – Qualifies for Hardship

This family experienced a decrease in income due to a job loss. The pre-hardship prior/retrospective income at enrollment was \$9,000. At the time of hardship request, the household reported current annual income of \$1,500. The household had no eligible deductions. The household qualifies for a temporary hardship because the rent burden exceeded 40%. The calculations are outlined below.

- Prior/Retrospective Income: \$9,000
- Stepped Rent based on Prior/Retrospective Adjusted Income: \$252
  - $\$9,000 / 12 = \$750$  is the adjusted monthly income
  - $\$750 \times 30\% = \$225$
  - Stepped Rent increase to be applied = \$27
  - $\$225 + 27 = \$252$
- Current Annual Adjusted Income: \$1,500
- Current Monthly Adjusted Income: \$125
  - Current annual adjusted income divided by 12

- $\$1,500 / 12 = \$125$
- Rent Burden: 202%:
  - Stepped rent divided by current monthly adjusted income
  - $\$252 / \$125 = 202\%$
- Household qualifies for hardship: The household is rent burdened.
- Hardship TTP: \$50
  - 40% of current monthly adjusted income
  - $\$125 \times 40\% = \$50$

### **Example #3: Rent Burden - Decrease in Income – Does not Qualify for Hardship**

This family experienced a decrease in income due to a job loss. The pre-hardship prior/retrospective income was \$9,000 and at the time of hardship request, the household reported current adjusted income of \$7,500. The household did not qualify for a temporary hardship because their rent burden did not exceed 40%. The calculations are outlined below.

- Pre-Hardship Prior/Retrospective Income: \$9,000
- Stepped Rent based on Prior/Retrospective Adjusted Income: \$252
  - Stepped Rent increase to be applied = \$27
  - $\$750 \times 30\% = \$225$
  - $\$225 + 27 = \$252$
- Current Annual Adjusted Income: \$8,000
- Current Monthly Adjusted Income: \$667
  - Current annual adjusted income divided by 12
  - $\$8,000 / 12 = \$667$
- Rent Burden: 36%:
  - Stepped rent TTP divided by current monthly adjusted income
  - $\$252 / 667 = 38\%$
- Household does not qualify for hardship: The household is NOT rent burdened.
- Their stepped rent would be \$252

### **Example #4: Rent Burden – Increase in Eligible Deductions – Does Not Qualify for Hardship**

A household of two gained custody of their two daughters age 14 and 15. The household now has a two dependent deductions. The pre-hardship, prior/retrospective annual income was \$30,000 and the household had no deductions, resulting in a prior/retrospective adjusted income of \$30,000. At the time of the hardship request, the household reported that their income was still \$30,000; however they were requesting a rent burden hardship and wanted the dependent deductions applied. The household had two stepped rent increases of \$27 each, applied prior to requesting the hardship. The household DOES NOT qualify for a temporary hardship because their rent burden does not exceed 40%. The calculations are outlined below.

- Pre-Hardship Prior/Retrospective Adjusted Income: \$30,000
- Stepped Rent based on Prior/Retrospective Adjusted Income: \$804
  - $\$30,000 / 12 = \$2,500$  is adjusted monthly income
  - $\$2,500 \times 30\% = \$750$
- Stepped Rent increase to be applied: \$27 for 2 prior years

- $\$750 + \$54 = \$804$
- Current Annual Adjusted Income: \$29,040
  - Current annual income minus dependent deduction
  - $\$30,000 - \$960 = \$29,040$
- Current Monthly Adjusted Income: \$2,420
  - Current annual adjusted income divided by 12
  - $\$29,040 / 12 = \$2,420$
- Rent Burden: 33%:
  - Stepped rent / current monthly adjusted income
  - $\$804 / \$2,420 = 33\%$
- Household does not qualify for hardship: Household is NOT rent burdened
- Their stepped rent would be \$804

#### **Example #5: Rent Burden – Increase in Eligible Deductions – Qualifies for Hardship**

A household of two had a baby 18 months after they started stepped rent. The household now has a dependent deduction and unreimbursed childcare expenses to enable the head of household to continue working. The pre-hardship, prior/retrospective adjusted income was \$30,000 and the household had no deductions. At the time of the hardship request, the household reported that their income was still \$30,000 and they had unreimbursed childcare expenses of \$8,000. The household qualifies for a temporary hardship because their rent burden exceeds 40%. The calculations are outlined below.

- Pre-Hardship Prior/Retrospective Adjusted Income: \$30,000
- Pre -Hardship Stepped Rent based on Prior/Retrospective Adjusted Income: \$777
  - $\$30,000 / 12 = \$2,500$  is the adjusted monthly income
  - $\$2,500 \times 30\% = \$750$
  - Stepped Rent increase to be applied = \$27
  - $\$750 + \$27 = \$777$
- Current Annual Adjusted Income: \$21,520
  - Current annual income minus unreimbursed childcare expenses minus dependent deduction
  - $\$30,000 - \$8,000 - \$480 = \$21,520$
- Current Monthly Adjusted Income: \$1,793
  - Current annual adjusted income divided by 12
  - $\$21,520 / 12 = \$1,793$
- Rent Burden: 43%:
  - Stepped rent TTP divided by current monthly adjusted income
  - $\$777 / \$1,793 = 43\%$
- Household qualifies for hardship: The household is rent burdened.
- Hardship TTP: \$717
  - 40% of current monthly adjusted income
  - $\$1,793 \times 40\% = \$717$

## STEPPED RENT RESET FOR SUSTAINED HARDSHIPS

If a household receives a temporary hardship due to a rent burden above 40%, and the hardship condition persists after 12 consecutive months, HC will reset the household's stepped rent and determine a new stepped rent TTP which is the higher of the minimum rent or 30% of prior/retrospective adjusted income. Rent reset, as a result of continued hardship, is based upon verification that the household meets the 40% rent burdened threshold.

HC has determined that resetting the stepped rent TTP 1) will enable families to increase income going forward without a corresponding rent increase, and 2) it will reduce HC's administrative burden by eliminating the need for ongoing annual hardship reviews.

### Request:

- A request to renew an existing hardship must be requested, in writing, by the household.

### Eligibility:

- If the hardship condition continues to exist 12 consecutive months after receiving a temporary rent burden hardship, a household will be eligible for a stepped rent TTP reset.

### Remedy:

- HC will calculate a new stepped rent TTP at the higher of the minimum rent or 30% of prior/retrospective adjusted income.

### Time Frame:

- This will not be a temporary hardship; the resulting will establish a new base on which future stepped rent annual increases will be applied.

### Example #6: Rent Reset for Sustained Hardship

In Example 5, the family was approved for a rent hardship. They claim that the hardship continues to exist. Their income and allowable deductions have not changed. HC will determine if they are still rent burdened and if so, reset their rent to reflect 30% of the prior/retrospective income.

- Current Pre-Hardship Rent: \$777
  - Current pre-hardship rent plus 1 years of rent increases (\$27)
  - $\$777 + \$27 = \$804$
- Prior/Retrospective Adjusted Annual Income: \$21,520
  - Current annual income minus unreimbursed childcare expenses minus dependent deduction
  - $\$30,000 - \$8,000 - \$480 = \$21,520$
  - This has not changed from when they first requested hardship 12 months ago.
- Prior/Retrospective Adjusted Monthly Income: \$1,793
  - Prior year/retrospective adjusted annual income divided by 12
  - $\$21,520 / 12 = \$1,793$
- Rent Burden: 43%:
  - Stepped Rent (including stepped rent increase) divided by prior/retrospective adjusted monthly income
  - $\$804 / \$1,793 = 43\%$
- Household remains rent burdened and is eligible for stepped rent reset
- Reset Stepped Rent TTP: \$538
  - 30% of prior/retrospective adjusted monthly income



- $30\% \times \$1,793 = \$538$

## **FULL-TIME STUDENT HARDSHIP**

HC will grant a full-time student status hardship rent, to a household, if a family member, other than the head of household, co-head or spouse, has earned income and, subsequent to enrollment, becomes a full-time student. Upon verification of full-time student status, HC will exclude all but \$480 of the full-time student's earned income, include a \$480 dependent deduction and calculate the hardship rent at 40% of current/adjusted monthly income.

### **Request:**

- A hardship due to full-time student status, must be requested, in writing, by the household.

### **Eligibility:**

- A household will be eligible for this hardship exemption if the household's current adjusted monthly income, with the full-time student income exclusion and dependent deduction, results in a rent burden (total tenant payment divided by their current adjusted monthly income) exceeds 40%.

### **Remedy:**

- If a hardship exists, the hardship TTP will be set using 40% of current/adjusted monthly income or the minimum rent, whichever is greater.

### **Time Frame:**

- The hardship will remain in place for a twelve-month period after which the family must reapply for the hardship and provide verification of full-time student status.
- If the family does not reapply and provide verification of full-time student status, the stepped rent TTP will revert to the pre-hardship stepped rent TTP plus any applicable stepped rent increases.
- Changes in student status do not need to be reported during the approved 12-month hardship period. When and if the household reapplies for the full-time student hardship, if the individual is no longer a full-time student, HC will reinstate the pre-hardship stepped rent plus any applicable stepped rent increases.

### **Example: #7 – Full-Time Student Hardship**

A family has a pre-hardship prior/retrospective income at enrollment of \$27,000 which included earned income from two household members. One of those household member's enrolls in school full-time and continues working. The full-time student has earned income of \$8,500. The household applies for the full-time student hardship. As a result of removal of all but \$480 of the full-time student's earned income and after applying the dependent deduction, the household is eligible for the full-time student hardship. The calculations are outlined below.

- Pre-Hardship Prior/Retrospective Income: \$27,000
- Stepped Rent based on Prior/Retrospective Adjusted Income: \$702
  - $\$27,000 / 12 = \$2,250$  is the adjusted monthly income
  - $\$2,250 \times 30\% = \$675$
  - Stepped Rent increase to be applied = \$27
  - $\$675 + 27 = \$702$
- Current Annual Adjusted Income: \$18,520
  - Current annual income minus the full-time student earned income exclusion minus dependent deduction
  - $\$27,000 - \$8,020 - \$480 = \$18,500$

- Current Monthly Adjusted Income: \$1,542
  - Current annual adjusted income divided by 12
  - $\$18,500 / 12 = \$1,542$
- Rent Burden: 46%:
  - Stepped rent TTP divided by current monthly adjusted income
  - $\$702 / 1,542 = 46\%$
- Hardship TTP: \$617
  - Current Monthly Adjusted Income x 40%
  - $\$1,542 \times 40\% = \$617$

#### ALTERNATIVE VERIFICATION HIERARCHY HARDSHIP

If a household does not agree with an income and rent determination which may be predicated upon the use of third-party documents and tenant declarations outside of the HUD standard Verification Hierarchy, the household may request an informal hearing as a second level of review of HC's determinations. HC will follow its existing policies upon receipt of the household's request for an informal hearing.

#### OTHER HARDSHIP

A household may request a hardship exemption for other circumstances not outlined above, such as the death of a family member, a significant increase in reasonable and necessary out-of-pocket expenses because of changed circumstances (for example, a large medical bill), or if the household is facing eviction due to inability to pay the rent. HC will consider these requests on a case-by-case basis and decisions will be made by the Department Director level or above.

##### **Eligibility:**

- The Department Head or his/her designee will determine that circumstances beyond the household's control make it difficult for the household to pay the stepped rent TTP, and a temporary rent reprieve is necessary.

##### **Remedy:**

- HC will review the household's current/anticipated income and determine whether to set a hardship TTP or apply the \$50 minimum rent based on the individual hardship.

##### **Time Frame:**

- The duration of the hardship rent will be determined on a case-by-case basis which will reflect the anticipated duration of the presented hardship.

### 3. Agency-Specific Waiver Request: Alternative Verification Hierarchy



**Housing Connect  
Agency Specific Waiver Request  
Alternative Verification Hierarchy  
Supplement FY 22-23**

Under the Moving to Work (MTW) Operations Notice, MTW agencies are allowed to request Agency-Specific Waivers for activities that are not specially included in Appendix I of the Operations Notice. Housing Connect (HC) is proposing to implement the following activity in both the Public Housing and Housing Choice Voucher (HCV) programs pursuant to an Agency-Specific Waiver.

**1. Description of Activity**

This activity will waive provisions of HUD PIH Notice 2018-18 and successor notices to allow HC to utilize an alternative, streamlined method to verify household member income for all Public Housing residents and HCV program participants (including both tenant-based and project-based programs). HC intends to implement this alternative method to streamline program administration and reduce administrative burdens to benefit both clients and the agency. While HC intends to apply the alternative verification hierarchy across the board to its Public Housing and HCV programs, this waiver will also support implementation of the Cohort #2 alternative rent policy evaluation initiative described in the MTW Supplement by facilitating the determination of retrospective income amounts.

This method has 3 changes to the current verification method:

- a. Alter the verification hierarchy to the following:

Level	Verification Technique	Ranking
1	Upfront Income Verification using HUD's EIV & IVT	Highest (Mandatory)
2	Upfront Income Verification using non-HUD system	Highest (Optional)
3	Written Third Party Verification Or Written Third Party Verification Form Or Oral Third Party Verification	High (Mandatory) <ul style="list-style-type: none"><li>• Supplements EIV and UIV</li><li>• Also used for:<ul style="list-style-type: none"><li>○ Non-EIV/UIV reported income sources</li><li>○ Disputes of EIV reported information</li></ul></li></ul>
4	Self-Certification	High (Optional) <ul style="list-style-type: none"><li>• To supplement EIV when EIV reported sources do not contain verification of the full retrospective period where applicable; or</li><li>• When tenant cannot produce written third party verification documents.</li></ul>

- b. Extend the time that verifications are valid: for applicants, verifications may not be more than 180 days old at the time of voucher issuance or Public Housing move in. For tenants and participants, verifications for reexaminations may not be more than 180 days from the effective date. This policy is applicable when HC is verifying current/anticipated income.
- c. In the case of fixed income verifications for applicants, tenants and participants (e.g., Social Security award letters, fixed pensions, etc.), verifications are valid for the full calendar year in which they are effective.

These changes to the verification method will reduce cost and achieve greater cost effectiveness in federal expenditures by decreasing administrative time spent on the verification process while still gathering appropriate information. PHA staff will be able to move through the verification levels more efficiently to provide proficient service to clients and reduce duplicate work. Extending the amount of time verifications are valid for will save time by not re-requesting verification from applicants, tenants and participants that has fallen out of date, but is still an accurate reflection of their current situation.

## **2. Relationship to MTW Statutory Objectives**

This activity supports the MTW objective of cost effectiveness by simplifying and streamlining the verification of income sources while also providing for accurate calculations.

## **3. Cost Implications**

This is a cost/revenue neutral activity.

## **4. Implementation timeline**

HC projects that the alternative verification hierarchy will begin to be used in concert with the timeline for initial implementation of the Cohort #2 alternative rent policy evaluation initiative.

## **5. Populations Groups and Household Types Impacted by Activity**

The alternative verification hierarchy will apply to all Public Housing residents and HCV program participants (including tenant-based and project-based). It will apply to all assisted households, both new admissions and currently assisted households and all family types.

## **6. Impact Analysis**

See attached

## **7. Hardship Policy**

As the new method will simplify and streamline the income verification process, it is not projected to create any hardships for residents. Public Housing residents and HCV program participants may



request a grievance/informal hearing to dispute the calculations used to determine income and rent. HC will follow its applicable policies on grievances/hearings.

#### **8. Public Comments**

No comments received from Public Hearing. A comprehensive summary of all public comments is provided with Section H.

**Housing Connect  
Agency Specific Waiver Request  
Alternative Verification Hierarchy  
Impact Analysis  
Supplement FY 22-23**

Under the Moving to Work (MTW) Operations Notice, MTW agencies are required to prepare an impact analysis as a “safe harbor” for certain activities proposed in the annual MTW Supplement. MTW agencies must prepare the impact analysis:

- Prior to implementation of the MTW activity, if required as a safe harbor;
- For certain activities as defined in the MTW Operations Notice on an annual basis during the implementation of the MTW activity;
- Prior to any Safe Harbor Waiver or Agency-Specific Waiver requests; and,
- At the time the MTW activity is closed out, if an impact analysis was previously required.

HC has prepared this impact analysis in conjunction with its first MTW Supplement for the fiscal year beginning on July 1, 2022. This analysis describes the projected impacts of the requested Agency-Specific Waiver related to using an alternative verification hierarchy for income verification in both the Public Housing and Housing Choice Voucher (HCV) programs.

**1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)**

The activity is revenue neutral. HC projects that there will no change to a family’s contribution based on the use of an alternative verification hierarchy. With respect to agency costs, HC projects a small time savings associated with staff using a streamlined verification hierarchy. Staff time will be re-purposed to better address applicant, participant and stakeholder needs.

**2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)**

HC does not project any impact on the affordability of housing costs for families. The only change is the method of verifying household income.

**3. Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**

HC does not expect that the proposed activity will have any impact on the agency’s waitlist including on the amount of time families are on the waitlist

**4. Impact on the agency’s termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

HC does not expect that implementation of the alternative verification hierarchy will have any measurable impact on HC’s termination rates for either the public housing or HCV programs.

HC’s current grievance/informal review/hearing policies provide participating families with the opportunity to dispute HC’s calculation of income and rent.

**5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**

HC does not expect that implementation of the alternative verification hierarchy will have any measurable impact on current public housing occupancy rates or HCV utilization rates.

**6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

HC projects that the alternative verification hierarchy will have a positive effect on the goal of increasing cost effectiveness as it will streamline the income verification process for both residents/participants and staff. Over the longer term, HC projects that the cumulative impacts of stepped rent, triennial reexamination, alternative verification hierarchy and other MTW initiatives activities will result in a more streamlined and cost-effective process for determining initial eligibility and conducting regular recertifications.

**7. Impact on the agency's ability to meet the MTW statutory requirements**

Implementation of the alternative verification hierarchy is not projected to have a measurable impact on HC's ability to meet the five MTW statutory requirements. HC intends to fully comply with the MTW statutory requirements throughout its participation in the MTW Demonstration.

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

HC does not anticipate that implementation of the requested Agency-Specific Waiver will generate additional hardship requests.

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

HC does not project any negative impacts including disparate impacts on protected classes as a result of implementing the requested Agency-Specific Waiver.

4. Safe Harbor Waiver Request:  
Alternative Reexamination Schedule for  
Households Activities 3.a. & 3.b.



## Safe Harbor Waiver-Alternative Reexamination Schedule Supplement FY 22-23

Housing Connect (HC) is requesting the following Safe Harbor waiver:

3.a & b. Alternative Reexamination Schedule for Households (PH & HCV)	<p>The standard MTW waiver provides that when an alternative reexamination schedule is established, the housing authority must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased by 10% or more.</p> <p>Instead, HC is proposing that households can request a hardship exemption under HC's Hardship Policy that will address a decrease in income or a rent burden above 40% of a household's current monthly adjusted income.</p>
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**Description of Standard MTW Waiver:** The agency may establish an alternative reexamination schedule for households.

**Statutes and Regulations Waived:** For PH, certain provisions of sections 3 (a)(1) and 3(a)(2)(E) of the 1937 ACT and 24 C.F.R. 960.257 (a)-(b). For HCV, certain provisions of sections 8(o)(5) of the 1937 Act and 24 CFR 982.516(a)(1) and 982.516(c)(2).

### Safe Harbors:

- i. Reexamination must occur at least every three years.
- ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.
- iii. Agency must implement an impact analysis.
- iv. Agency must include a hardship policy.

### Requested Safe Harbor Waiver and Explanation

HC is requesting this Safe Harbor waiver in connection with its participation in the Rent Reform demonstration. This waiver will apply to households who are eligible for the Rent Reform demonstration and selected to pay rent under the Stepped Rent policy. The study design requires HC and the other demonstration sites to conduct a reexamination/eligibility check of each Stepped Rent household's income every three years (triennially).

However, rather than providing an interim reexamination once per year if the household has a decrease in gross income of 10% or more as specified in the standard 3. a. & b. waiver, HC will offer a hardship policy that allows households to request a hardship rent if they experience a decrease in income or a rent burden above 40% of a household's current monthly adjusted income.

This waiver will provide administrative relief to HC by decreasing the frequency of reexaminations, while providing households with the hardship policy as a way to get rent relief if they experience a decrease in income.

Please note the impact analysis for this waiver is captured in the comprehensive impact analysis for the following MTW activities:

- 1. c. – Stepped Rent (PH)
- 1. d. – Stepped Rent (HCV)
- 3. a. – Alternative Reexamination Schedule for Households (PH)
- 3. b. – Alternative Reexamination Schedule for Households (HCV)

### **Comments from Public Hearing**

No comments received from Public Hearing. A comprehensive summary of all public comments is provided with Section H.



## 5. Safe Harbor Waiver Request: Self-Certification of Assets Activities 3.c. & 3.d.



**Housing Connect  
Safe Harbor Waiver  
Self-Certification of Assets  
Supplement FY 22-23**

**1. Safe Harbor Name and Number & Associated Activity**

Self-Certification of Assets  
3c & 3d

**2. Safe Harbor & Implementing Regulations**

The Operations Notice establishes the following safe harbors and waives the following statutes and regulations for activities 3c and 3d:

- Safe Harbor:
  - At reexamination, the agency may allow the self-certification of assets only up to \$50,000
- Statutes and Regulations Waived:
  - PH: Certain provisions of sections 3 (a)(1) and 3(a)(2)(E) of the 1937 ACT and 24 C.F.R. 960.259 (c)-(2).
  - HCV: Certain provisions of section 8(o)(5) of the 1937 Act and 24 CFR982.516(a)(3).

**3. Proposed MTW Activity the MTW Agency Wishes to Implement via the Safe Harbor Waiver**

HC is requesting this Safe Harbor waiver to allow the self-certification of assets only up to \$50,000 at new admission as well as at reexamination.

This waiver will provide administrative relief to HC staff and reduce time spent verifying assets. The majority of applicants have minimal assets with little to no income from their assets. The method of verification for these assets will have an insignificant impact on TTP and HAP amounts but will have a large impact on reducing administrative time and achieving greater cost effectiveness in federal expenditures. Administrative burdens are also eased for applicants and participants in that they do not have to provide third party verification of assets, especially in light of the fact that the assets frequently result in little or no income.

**4. Description of the Local Issue and Why such an Expansion is Needed to Implement the MTW Activity**

Under the MTW Operations Notice, MTW agencies may accept asset self-certification at reexamination and only for assets valued up to \$50,000. As the Selection Notice does not provide this flexibility for applicants at admission, HC is submitting this safe harbor request to conform to the requirements in HC's stepped rent policy under Cohort 2.

**5. Impact Analysis**

An impact analysis is provided as a separate attachment

**6. Description of the Hardship Policy for the MTW Activity, if applicable**

Not Applicable. Allowing self-certification of assets up to \$50,000 at admission and reexamination does not result in any hardship to applicants or participants.

**7. Comments from Public Hearing**

No comments received from Public Hearing. A comprehensive summary of all public comments is provided with Section H.



**Housing Connect  
Impact Analysis  
Self-Certification of Assets  
Supplement FY 22-23**

Under the Moving to Work (MTW) Operations Notice, MTW agencies are required to prepare an impact analysis when submitting Safe Harbor waiver requests for certain activities proposed in the annual MTW Supplement. MTW agencies must prepare the impact analysis:

- Prior to implementation of the MTW activity, if required as a safe harbor;
- For certain activities as defined in the MTW Operations Notice on an annual basis during the implementation of the MTW activity;
- Prior to any Safe Harbor Waiver or Agency-Specific Waiver requests; and,
- At the time the MTW activity is closed out, if an impact analysis was previously required.

HC has prepared this impact analysis in conjunction with its first MTW Supplement for the fiscal year beginning on July 1, 2022. This analysis describes the projected impacts of the requested Safe Harbor waiver request related to allowing the self-certification of assets at admission and reexamination for Public Housing and Housing Choice Voucher families with assets up to \$50,000.

**1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)**

The activity is revenue neutral. HC projects that there will no change to a family's contribution based on allowing the self-certification of asset value and income at admission and reexamination. With respect to agency costs, HC projects a small time savings associated with staff using a streamlined verification and calculation approach for assets up to \$50,000. Staff time will be re-purposed to better address applicant, participant and stakeholder needs.

Approximately 97% of all HC households report assets under \$50,000 and of those households, the average asset income is \$5.97. HC does not forecast a change to agency finances when applying this policy to new admissions and existing participants.

**2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)**

HC does not project any impact on the affordability of housing costs for families. The only change is the method of verifying asset value and income.

**3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**

HC does not expect that the proposed activity will have any impact on the agency's waitlist including on the amount of time families are on the waitlist

**4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

HC does not expect that implementation of the asset self-certification for new admissions and participants will have any measurable impact on HC's termination rates for either the public housing or HCV programs.

HC's current grievance/informal review/hearing policies provide participating families with the opportunity to dispute HC's calculation of income and rent.

**5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**

HC does not expect that implementation of self-certification of assets up to \$50,000 for new admissions and participants will have any measurable impact on current public housing occupancy rates or HCV utilization rates.

**6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

HC projects that the asset self-certification will have a positive effect on the goal of increasing cost effectiveness as it will streamline the income verification process for both applicants/participants and staff. Over the longer term, HC projects that the cumulative impacts of stepped rent, triennial reexamination, alternative verification hierarchy, asset self-certification and other MTW initiatives activities will result in a more streamlined and cost-effective process for determining initial eligibility and conducting regular recertifications.

**7. Impact on the agency's ability to meet the MTW statutory requirements**

Implementation of the asset self-certification for applicants and participants is not projected to have a measurable impact on HC's ability to meet the five MTW statutory requirements. HC intends to fully comply with the MTW statutory requirements throughout its participation in the MTW Demonstration.

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

HC does not anticipate that implementation of the requested Safe Harbor waiver request will generate additional hardship requests.

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

HC does not project any negative impacts including disparate impacts on protected classes as a result of implementing the requested Safe Harbor waiver.

~~6. Safe Harbor Waiver Request:  
Elimination of PBV Selection Process (HCV)  
Activity 9.e.~~

NOT APPROVED





**NOT APPROVED**

**Housing Connect  
Safe Harbor Waiver  
Elimination of PBV Selection Process (HCV)  
Supplement FY 22-23**

**1. Safe Harbor Name and Number & Associated Activity**

Elimination of PBV Selection Process (HCV)  
9.c.

**2. Safe Harbor & Implementing Regulations**

The Operations Notice establishes the following safe harbors and waives the following statutes and regulations for activities 9.c.:

- Safe Harbors:
  - i. A subsidy layering review must be conducted.
  - ii. The agency must complete site selection requirements.
  - iii. **HQS inspections must be performed by an independent entity according to 24 C.F.R. 983.59(b) or 24 C.F.R. 983.103(f).**
  - iv. The agency is subject to Notice PIH 2013-27 where applicable, or successor
  - v. Property must be owned by a single-asset entity of the agency, see Notice PIH 2017-21.
- Statutes and Regulations Waived:
  - HCV: Certain provisions of 24 CFR 983.51 as it was superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461 (see implementation guidance in Notice PIH 2017-21).

**3. Requested Safe Harbor Waiver and Explanation**

HC is requesting a Safe Harbor waiver for 9.c.iii to allow Housing Connect to inspect PHA-owned PBV units. Please note HC has requested a waiver under 5.c. that will allow HC to inspect PHA-owned PBV units. In the event that HUD determines that the 5.c. waiver does not apply to PBV units selected under 9.c.iii, HC is submitting this safe harbor waiver request to conform to the requirements of the Operations Notice.

As noted in 5.c., this waiver will allow Housing Connect (HC) to perform HQS inspections on PBV units that it owns, manages, and/or controls. All such inspections will be conducted using HQS standards found at 24 CFR 982.401. To ensure the consistent and uniform application of HQS standards, HC supervisory staff will conduct quality control inspections on a random sample of units in accordance with the inspection Quality Assurance Method included as an attachment. Program participants may request an interim inspection by contacting HC in accordance with the policies described in the Administrative Plan. If requested by HUD, HC will obtain the services of a third-party entity to determine if HC owned units pass HQS. This activity helps support the HC goal to streamline program administration and promote timely lease-up of PBV units.

**NOT APPROVED**

**4. Description of the Local Issue and Why such an Expansion is Needed to Implement the MTW Activity**

Under the MTW Operations Notice, MTW agencies may request to perform inspections on PBV units that it owns under activity 5.c. Under activity 9.c. the Selection Notice does not provide this flexibility therefore HC is submitting this safe harbor request.

**5. Impact Analysis**

Not Applicable.

**6. Description of the Hardship Policy for the MTW Activity, if applicable**

Not Applicable.

**7. Comments from Public Hearing**

No comments received from Public Hearing. A comprehensive summary of all public comments is provided with Section H.

## 7. Quality Assurance Method: Rent Reasonableness Activity 2.d.



**Housing Connect  
Rent Reasonableness Quality Assurance Protocol  
PBV Owned, Managed and/or Controlled Units - Activity 2.d.  
Supplement FY 22-23**

***Introduction:***

Under MTW, Housing Connect has received approval to waive the requirement that rent reasonable determinations, on PBV units that it owns, manages and/or controls, be conducted by a third party. As a safe harbor for this waiver, Housing Connect has developed a quality assurance protocol to ensure impartiality in rent determinations for Housing Connect PBV units that it owns, manages and/or controls.

***Assessment:***

Whether Housing Connect takes into consideration the location, size, type, quality and age of the units, and the amenities, housing services, and maintenance and utilities when determining comparability and the reasonable rent.

Whether Housing Connect determines and documents, for PBV units that Housing Connect owns, manages and/or controls, that the rent to owner is reasonable based on current rents for comparable unassisted units:

- Whenever there is a 10 percent decrease in the published FMR in effect 60 days before the contract anniversary (for the unit sizes specified in the HAP contract) as compared with the FMR in effect 1 year before the contract anniversary.
- Whenever Housing Connect approves a change in the allocation of responsibility for utilities between the owner and the tenant;
- Whenever the HAP contract is amended to substitute a different contract unit in the same building or project; and
- Whenever there is any other change that may substantially affect the reasonable rent.

***Regulatory Waivers:*** 24 CFR Sections 983.303 and 982.352(b)

***Information Needs:***

1. Administrative Plan sections on Rent Reasonableness
2. The number of families assisted in PBV units owned, managed and/or controlled by Housing Connect.

***Action Steps:***

1. Determine the proper sample size based on the number of families assisted in PBV units owned, managed and/or controlled by Housing Connect.
2. Select a random sample using the universe and table below.
3. Review Administrative Plan policies governing rent reasonableness.
4. Review each file for adherence to rent reasonableness policies and procedures.
5. Complete data collection form.



6. Determine what percent of families in the sample had reasonable rent determinations completed correctly.
7. Take action to address any material deficiencies in Housing Connect's rent reasonableness process

Universe Size	Minimum Number of files to be Sampled
50 or less	5
51 – 600	5 + 1 for each 50 (or part of 50) over 50
601 – 2000	16 plus 1 for each 100 (or part of 100) over 600
Over 2000	30 plus 1 for each 200 (or part of 200) over 2000



**HOUSING CONNECT**  
**Rent Reasonableness: PBV Owned, Managed & Controlled Units**

**Period of Review:** \_\_\_\_\_

Family Name	Rent Determination Date	Was this action during the fiscal year being reviewed?	Rent Amount for Unit	System Generated Comp	Subject unit utility payment entered correctly?	Subject unit type/amenities/quality/etc. entered correctly?	Comments (enter findings)	Answer to each question is consistent with policy?

Number of Rents Reviewed: \_\_\_\_\_

Number of Rent Reasonableness determinations which were consistent with policy: \_\_\_\_\_

Percent Rent Reasonableness determinations which were consistent with policy: \_\_\_\_\_



8. Quality Assurance Method:  
Third-Party Requirement  
Activity 5.c.



**Housing Connect**  
**HQS Inspection Quality Assurance Methods – Activity 5.c.**  
**Supplement FY 22-23**

Housing Connect (HC) will perform HUD Housing Quality Standards (HQS) inspections on Project Based Voucher units that are owned, managed and/or controlled by HC. To ensure the consistency and uniformity of these HQS inspections, HC shall perform quality control (QC) inspections on a random sample of HQS inspections completed on HC owned units in accordance with the policies described in the Administrative Plan. The following information describes HC's quality control inspection policies and HC's HQS QC audit protocol.

**A. Program Integrity and Ethics**

General Principles:

1. HC anticipates that the vast majority of families, owners, and HC employees intend to and will comply with program requirements and make reasonable efforts to avoid errors.
2. To ensure that the HC's HCV program is administered effectively and according to the highest ethical and legal standards, HC will employ a variety of techniques to ensure that both errors and intentional program abuse are rare.
3. In addition to taking steps to prevent errors and program abuse, HC will use a variety of activities to detect errors and program abuse.

Quality Control and Analysis of Data

1. Under the Section 8 Management Assessment Program (SEMAP), HUD requires completion of quality control HQS inspections to provide feedback on inspectors' work, which can be used to determine if individual performance or general HQS training issues need to be addressed.
2. **HC will also conduct HQS QC reviews on a random sample of HQS inspections completed on HC owned units consistent with the SEMAP HQS QC protocol. The universe is the number of HC owned units under HAP contract**
3. HC will use the results reported in any Independent Public Accountant (IPA) or HUD monitoring reports to identify potential program abuses as well as to assess the effectiveness of the HC's error detection and abuse prevention efforts.
4. HC will review all referrals, specific allegations, complaints, and tips from any source including, other agencies, companies, and individuals, to determine if they warrant investigation. In order for the HC to investigate, the allegation must contain at least one independently-verifiable item of information, such as the name of an employer or the name of an unauthorized household member.



5. HC will investigate inconsistent information related to the family that is identified through file reviews and the verification process.

## B. Management Assessment Objectives

Housing Connect operates its housing assistance program with efficiency and uses resources in a manner that reflects commitment to quality and service. Housing Connect's policies and practices are consistent with SEMAP goals and objectives.

In order to demonstrate compliance with HUD and other pertinent regulations, HC will maintain records, reports and other documentation for a time that is in accordance with HUD requirements and in a manner that will allow an auditor, housing professional or other interested party to monitor HC's operational procedures and practices objectively and accurately.

In addition to SEMAP monitoring, to ensure quality control, supervisory staff performs random audits of all Housing Choice Voucher actions.

### HQS QUALITY CONTROL INSPECTIONS AUDIT PROTOCOL - HC OWNED UNITS

Universe	Minimum Number of Reinspections to be Conducted
50 or less	5
51 – 600	5 + 1 for each 50 (or part of 50) over 50
601 – 2000	16 plus 1 for each 100 (or part of 100) over 600
Over 2000	30 plus 1 for each 200 (or part of 200) over 2000

Quarter	Period of Review	Universe: For HHA owned units, the number units under HAP contract where the last HQS Inspection was completed within the past three months	# of Files to Sample
Quarter 1			
Quarter 2			
Quarter 3			
Quarter 4			



**HOUSING CONNECT**  
**HQS QUALITY CONTROL INSPECTIONS - HC OWNED UNITS**

Period of Review: \_\_\_\_\_

Family	Initial Inspector	Original Inspection Date	QC Inspection Date	QC Inspector	Within 3 months? Y/N	QC Inspection Results; Consistent w/ Initial Inspection? Y/N	Comments

Analysis: (include issues identified and related recommendations and follow-up actions): \_\_\_\_\_

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## 9. Proposed Stepped Rents



## Housing Connect Stepped Rent Schedule Supplement FY 22-23

The table below shows the Final FY 2022 Fair Market Rents in Salt Lake County and the minimum and maximum annual rent increase allowed under the Stepped Rent policy.

Bedroom Size	0	1	2	3	4	5	6	7	8
FMR	\$924	\$1,112	\$1,327	\$1,843	\$2,066	\$2,375	\$2,732	\$3,141	\$3,612
Minimum Increase (2%)	\$18.48	\$22.24	\$26.54	\$36.86	\$41.32	\$47.50	\$54.64	\$62.82	\$72.24
Maximum Increase (4%)	\$36.96	\$44.48	\$53.08	\$73.72	\$82.64	\$95.00	\$109.28	\$125.64	\$144.48

Housing Connect intends to set increases at 2% for stepped rent increases with 5 bedroom subsidies and larger maintaining the same step. **Proposed increases:**

Bedroom Size	0	1	2	3	4	5	6	7	8
FMR	\$924	\$1,112	\$1,327	\$1,843	\$2,066	\$2,375	\$2,732	\$3,141	\$3,612
Projected Increase	\$19	\$23	\$27	\$37	\$42	\$48	\$48	\$48	\$48



## 10. Impact Analysis

**MTW Impact Analysis  
Stepped Rent  
Stepped Rent and Alternative UA**

Under the Moving to Work (MTW) Operations Notice, MTW agencies, including Housing Connect (HC) are required to prepare an impact analysis as a “safe harbor” for certain activities proposed in the annual MTW Supplement. MTW agencies must prepare the impact analysis:

- Prior to implementation of the MTW activity, if required as a safe harbor;
- For certain activities as defined in the MTW Operations Notice on an annual basis during the implementation of the MTW activity;
- Prior to any Safe Harbor Waiver or Agency-Specific Waiver requests; and,
- At the time the MTW activity is closed out, if an impact analysis was previously required.

HC has prepared this impact analysis in conjunction with its first MTW Supplement for the fiscal year beginning on July 1, 2022. This analysis describes the projected impacts of the following proposed MTW waiver activities which include activities needed to implement the MTW stepped rent program described in the MTW supplement. The impact analysis is an estimate of the forecasted financial impact on agency and participant costs as HC is unable to determine with exactness the actual change in participant income from year to year. HC established assumptions on which the impact analysis is based and which are detailed later in this document.

<b>Activity No.</b>	<b>Description</b>
1c	Stepped Rent – Public Housing
1d	Stepped Rent - HCV
3a	Alternative Reexamination Schedule for Households – Public Housing
3b	Alternative Reexamination Schedule for Households – HCV
Safe Harbor	Alternative Reexamination Schedules (Public Housing and HCV)
1i	Stepped Rent and Alternative Utility Allowance – Public Housing
1j	Stepped Rent and Alternative Utility Allowance - HCV

Overall, HC projects that the cumulative impact of the above-listed MTW activities will be:

- Beneficial to participants by providing either no change or small increases/decrease in rent to the majority of participants, while increasing opportunities to retain increases in earned income through less frequent recertifications
- Supportive of HC’s efforts to streamline program operations; reduce administrative burdens on both staff and clients; enhance resident economic self-sufficiency; and, expand housing choices

**1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)**

See response under #2 and impact analysis tables on pages 5-10

**2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)**

Please note that the results of the rent reform random assignment process (and the incomes of participants at initial enrollment) are unknown at this time which limits HC’s ability to forecast financial impacts.

The tables and charts on pages 5-10 summarize HC's preliminary projections of the impacts of stepped rent, as well as the impact of stepped rent together with the alternative utility allowance, on agency finances and existing families rents in the Public Housing and HCV programs.

Compared to standard HUD Public Housing and HCV program rent calculation methods, calculation of rents using HC's MTW stepped rent methodology are projected to result in small increases for the majority of families. Outlined below are points which summarize the impact. Please note that the analysis does not consider the impact that hardship requests will have on HAP, Rent Roll and/or Tenant Rent (TR).

### **Summary Results of Financial Impact – Stepped Rent Only**

#### General

- Families in large units with modest incomes may experience larger increases in TR since the stepped rent increase may be larger than the impact that the increase in income may have. HC's hardship policies provide for rent burden hardships so that families have relief in the event of a stepped rent burden.

#### At Enrollment - HCV

- HAP is forecasted to decrease \$4,968
- 17 HCV families will experience an increase in TR with the average increase for those families being \$24.
- 701 HCV families will experience no change to TR and no HCV families will experience an increase in TR
- The change in HCV TR and HAP at enrollment is as a result of the increase in minimum rent from \$25 to \$50 for households in the Project-Based program.

#### Year Two - HCV

- HAP is forecasted to decrease \$79,908.
- 224 HCV families are forecasted to have a decrease in TR with an average decrease of \$16.
- 464 HCV families are forecasted to experience an increase in TR with an average increase of \$22.

#### At Enrollment – Public Housing

- No change in Rent roll is forecasted.
- No public households will experience any change in TR at enrollment

#### Year Two – Public Housing

- Rent Roll is forecasted to increase by \$1,416.
- 10 Public Housing families are forecasted to have a decrease in TR with an average decrease of \$20.
- 35 Public Housing families are forecasted to experience an increase in TR with an average increase of \$25.

### **Summary Results of Financial Impact – Stepped Rent & Alternative Utility Allowance**

#### At Enrollment - HCV

- HAP is forecasted to decrease \$4,992
- 163 HCV households will experience no change in TR.
- 360 HCV households will experience a decrease in TR with the average decrease of \$26.

- 195 HCV households will experience an increase in TR with the average increase for those households being \$49.

#### Year Two - HCV

- HAP is forecasted to decrease \$80,196.
- 31 HCV families will not experience any change in TR
- 280 HCV families are forecasted to have a decrease in TR with an average decrease of \$29.
- 407 HCV families are forecasted to experience an increase in TR with an average increase of \$37.

#### At Enrollment – Public Housing

- Rent Roll is forecasted to decrease by \$7,680.
- 48 Public Housing families are forecasted to have a decrease in TR with an average decrease of \$23.
- No Public Housing families will experience an increase in tenant rent at enrollment and 3 families will not experience any change in TR.

#### Year Two – Public Housing

- Rent Roll is forecasted to decrease by \$7,032.
- 26 Public Housing families are forecasted to have a decrease in TR with an average decrease of \$24.
- 24 Public Housing families are forecasted to experience an increase in TR with an average increase of \$9
- 1 Public Housing family will not experience any change in TR.

### **Assumptions & Methodologies used in Financial Impact Analysis**

The following assumptions and methodologies were employed in preparing the impact analysis:

- Current participant income and eligible deductions were used to determine the impact of stepped rent at enrollment.
- The Social Security Cost of Living Adjustment (COLA) was used to forecast the change in income in year 2. This represents the most current COLA which was applied to 2022 benefits.
- The updated utility allowance schedule, completed in April 2022, was applied to all households in the baseline (current scenario), at enrollment scenario (year 1) and in year 2 for the stepped rent impact analysis.
- In year 2, the stepped rent increase was applied to each household's enrollment TTP according to the unit size.
- Income was calculated by applying the 5.9% increase to baseline household income.
- Total HAP, Rent Roll and TR were compared using the HUD formula (current scenario) to the total HAP, Rent Roll and TR under stepped rent.
- A minimum rent of \$50 was applied. This represents an increase of \$25 for participants in the Project -Based program and no change for participants in the Public Housing and HCV programs.
- Payment standards and contract rents were held at current levels for HCV participants in year 2.
- For the stepped rent and alternative UA, stepped rent policies and the alternative UA schedule policies were applied.

### **3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**

HC does not expect that the proposed activities will have any impact on the agency's waitlist including on the amount of time families are on the waitlist

**4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

HC has developed a Hardship Policy to address potential areas of hardship for participating families. HC does not expect that the proposed MTW activities will have an impact on HC's termination rates for either the Public Housing or HCV programs.

**5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**

HC does not project that the proposed MTW activities will have an impact on current Public Housing occupancy rates or HCV utilization rates.

**6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

HC projects that the stepped rent system will have a positive impact on resident self-sufficiency (i.e. increases to household earned income) by allowing treatment group participants a three-year window between regular recertifications during which the household can increase income with only a small corresponding increase in rent.

Over the longer term, HC projects that the stepped rent and triennial reexamination activities will result in a more streamlined process for determining initial eligibility and conducting regular recertifications. Thus, the activities are expected to support the MTW goal of improving cost effectiveness.

**7. Impact on the agency's ability to meet the MTW statutory requirements**

Implementation of the proposed MTW activities are projected to have no impact on HC's ability to meet the five MTW statutory requirements. HC intends to fully comply with the MTW statutory requirements throughout its participation in the MTW Demonstration.

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

While not possible to quantify, HC projects that hardship requests by households randomly selected for the treatment group are likely to increase as a result of the proposed MTW activities. If treatment group households experience a decrease in income or increase in deductions that meets the thresholds defined in the Hardship Policy, they will need to apply for a hardship in order to have their rent reduced. Given that this is a new initiative, HC expects that the denial rates for hardship requests may be somewhat higher during initial implementation of the stepped rent policy; however, this may change over time as families become more aware of how the Hardship Policy works.

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

HC does not project any negative impacts including disparate impacts on protected classes as a result of the proposed MTW activities.

# **STEPPED RENT IMPACT ANALYSIS - HCV**

	Bedroom Size							
	All	0	1	2	3	4	5	6
<b>Total Number of Households</b>	718	3	92	268	269	60	24	2
<b>Annual Total HAP</b>								
Year 1 - Current Scenario	\$7,601,148	\$8,748	\$829,944	\$2,619,312	\$3,088,848	\$705,156	\$313,128	\$36,012
Year 1 - Stepped Rent (At Enrollment)	\$7,596,180	\$8,748	\$829,944	\$2,619,012	\$3,084,648	\$704,688	\$313,128	\$36,012
Change in Annual Total HAP	(\$4,968)	\$0	\$0	(\$300)	(\$4,200)	(\$468)	\$0	\$0
<b>Year 2 - Current Scenario</b>	<b>\$7,406,520</b>	<b>\$8,220</b>	<b>\$813,840</b>	<b>\$2,559,924</b>	<b>\$3,007,752</b>	<b>\$680,064</b>	<b>\$301,536</b>	<b>\$35,184</b>
Year 2 - Stepped Rent	\$7,326,612	\$8,292	\$804,828	\$2,535,312	\$2,968,212	\$675,804	\$299,304	\$34,860
Change in Annual Total HAP	(\$79,908)	\$72	(\$9,012)	(\$24,612)	(\$39,540)	(\$4,260)	(\$2,232)	(\$324)
<b>Average Family Share</b>								
Year 1 - Current Scenario	\$426	\$435	\$280	\$363	\$467	\$626	\$730	\$505
Year 1 - Stepped Rent (At Enrollment)	\$427	\$435	\$280	\$363	\$469	\$627	\$730	\$505
Change in Average Family Share	(\$1)	\$0	\$0	(\$0)	(\$1)	(\$1)	\$0	\$0
<b>Year 2 - Current Scenario</b>	<b>\$449</b>	<b>\$450</b>	<b>\$294</b>	<b>\$382</b>	<b>\$492</b>	<b>\$661</b>	<b>\$770</b>	<b>\$540</b>
Year 2 - Stepped Rent	\$458	\$448	\$302	\$389	\$505	\$667	\$778	\$553
Change in Average Family Share	\$9	(\$2)	\$8	\$8	\$12	\$6	\$8	\$14
<b>Impact on Tenant (TR)</b>								
<b>Year 1 - Enrollment</b>								
Households with No Change	701	3	92	267	255	58	24	2
Households with a Decrease	0	0	0	0	0	0	0	0
Average Decrease	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Households with an Increase	17	0	0	1	14	2	0	0
Average Increase	\$24	N/A	N/A	\$25	\$25	\$20	N/A	N/A
<b>Dollar Increase</b>								
\$1 to \$5	0	0	0	0	0	0	0	0
\$6 to \$10	0	0	0	0	0	0	0	0
\$11 to \$15	1	0	0	0	0	1	0	0
\$16 to \$20	0	0	0	0	0	0	0	0
\$21 to \$25	16	0	0	1	14	1	0	0
<b>Impact on Tenant (TR) - Year 2</b>								
Households with No Change	30	1	3	14	9	3	0	0
Households with a Decrease	224	1	23	77	87	25	11	0
Average Decrease	\$16	\$25	\$15	\$17	\$14	\$16	\$22	N/A
Households with an Increase	464	1	66	177	173	32	13	2
Average Increase	\$22	\$19	\$17	\$19	\$26	\$24	\$33	\$14
<b>Dollar Decrease</b>								
\$1 to \$5	45	0	3	14	19	8	1	0
\$6 to \$10	52	0	5	19	20	6	2	0
\$11 to \$25	82	1	12	26	35	5	3	0
\$26 to \$50	43	0	3	18	12	5	5	0
\$51 to \$100	2	0	0	0	1	1	0	0
<b>Dollar Increase</b>								
\$1 to \$5	49	0	10	23	12	4	0	0
\$6 to \$10	58	0	7	21	23	5	1	1
\$11 to \$25	175	1	49	57	56	7	4	1
\$26 to \$50	165	0	0	75	68	14	8	0
\$51 to \$100	17	0	0	1	14	2	0	0



## STEPPED RENT IMPACT ANALYSIS – PUBLIC HOUSING

		Bedroom Size		
	All	2	3	4
<b>Total Number of Households</b>	51	20	21	10
<b>Annual Total Rent Roll</b>				
Year 1 - Current Scenario	\$200,268	\$75,120	\$70,800	\$54,348
Year 1 - Stepped Rent (At Enrollment)	\$200,268	\$75,120	\$70,800	\$54,348
Change in Total Rent Roll	\$0	\$0	\$0	\$0
<b>Year 2 - Current Scenario</b>	\$210,996	\$78,264	\$75,612	\$57,120
<b>Year 2 - Stepped Rent</b>	\$212,412	\$79,152	\$76,128	\$57,132
<b>Change in Total Rent Roll</b>	\$1,416	\$888	\$516	\$12
<b>Average TTP</b>				
Year 1 - Current Scenario	\$409	\$391	\$355	\$557
Year 1 - Stepped Rent (At Enrollment)	\$409	\$391	\$355	\$557
Change in Average TTP	\$0	\$0	\$0	\$0
<b>Year 2 - Current Scenario</b>	\$427	\$405	\$375	\$581
<b>Year 2 - Stepped Rent</b>	\$440	\$414	\$392	\$595
<b>Change in Average TTP</b>	\$14	\$9	\$17	\$14
<b>Impact on Tenant (TR) – Year 1- At Enrollment</b>				
Households with No Change	51	20	21	10
Households with a Decrease	0	0	0	0
Average Decrease	N/A	N/A	N/A	N/A
Households with an Increase	0	0	0	0
Average Increase	N/A	N/A	N/A	N/A
<b>Impact on Tenant (TR/UAP) - Year 2</b>				
Households with No Change	6	4	1	1
Households with a Decrease	10	3	4	3
Average Decrease	\$20	\$15	\$20	\$25
Households with an Increase	35	13	16	6
Average Increase	\$25	\$18	\$28	\$36
<b>Dollar Decrease</b>				
\$1 to \$5	2	1	1	0
\$6 to \$10	0	0	0	0
\$11 to \$25	4	1	2	1
\$26 to \$50	4	1	1	2
<b>Dollar Increase</b>				
\$1 to \$5	2	1	1	0
\$6 to \$10	1	1	0	0
\$11 to \$25	11	8	3	0
\$26 to \$50	21	3	12	6

# **STEPPED RENT & ALTERNATIVE UTILITY ALLOWANCE IMPACT ANALYSIS – HCV**

		Bedroom Size						
	All	0	1	2	3	4	5	6
<b>Total Number of Households</b>	718	3	92	268	269	60	24	2
<b>Number of Households with Utility Allowance</b>	641	3	85	239	239	55	18	2
<b>Annual Total HAP</b>								
<b>Year 1 - Current Scenario</b>	\$7,601,148	\$8,748	\$829,944	\$2,619,312	\$3,088,848	\$705,156	\$313,128	\$36,012
<b>Year 1 - Stepped Rent (At Enrollment)</b>	\$7,596,156	\$9,084	\$824,928	\$2,622,252	\$3,090,024	\$710,508	\$304,764	\$34,596
<b>Change in Annual Total HAP</b>	(\$4,992)	\$336	(\$5,016)	\$2,940	\$1,176	\$5,352	(\$8,364)	(\$1,416)
<b>Year 2 - Current Scenario</b>	\$7,406,520	\$8,220	\$813,840	\$2,559,924	\$3,007,752	\$680,064	\$301,536	\$35,184
<b>Year 2 - Stepped Rent</b>	\$7,326,324	\$8,628	\$799,812	\$2,538,672	\$2,973,456	\$681,372	\$290,940	\$33,444
<b>Change in Annual Total HAP</b>	(\$80,196)	\$408	(\$14,028)	(\$21,252)	(\$34,296)	\$1,308	(\$10,596)	(\$1,740)
<b>Average Family Share</b>								
<b>Year 1 - Current Scenario</b>	\$426	\$435	\$280	\$363	\$467	\$626	\$730	\$505
<b>Year 1 - Stepped Rent (At Enrollment) &amp; Alt UA</b>	\$425	\$436	\$277	\$363	\$465	\$621	\$716	\$505
<b>Change in Average Family Share</b>	\$2	(\$1)	\$2	(\$0)	\$2	\$6	\$13	\$0
<b>Year 2 - Current Scenario</b>	\$447	\$460	\$288	\$383	\$491	\$663	\$728	\$481
<b>Year 2 - Stepped Rent</b>	\$456	\$449	\$300	\$389	\$502	\$661	\$764	\$553
<b>Change in Average Family Share</b>	\$9	(\$11)	\$13	\$7	\$11	(\$2)	\$37	\$73
<b>Impact on Tenant (TR)</b>								
<b>Year 1 - Enrollment</b>								
<b>Households with No Change</b>	163	1	11	60	65	15	11	0
<b>Households with a Decrease</b>	360	2	49	146	129	32	2	0
<b>Average Decrease</b>	\$26	\$14	\$24	\$22	\$26	\$40	\$42	N/A
<b>Households with an Increase</b>	195	0	32	62	75	13	11	2
<b>Average Increase</b>	\$49	N/A	\$49	\$49	\$43	\$65	\$71	\$59
<b>Dollar Decrease</b>								
<b>\$1 to \$25</b>	249	1	36	114	79	18	1	0
<b>\$26 to \$50</b>	65	1	9	16	36	3	0	0
<b>\$51 to \$75</b>	25	0	4	16	2	3	0	0
<b>\$76 to \$100</b>	21	0	0	0	12	8	1	0
<b>Dollar Increase</b>								
<b>\$1 to \$25</b>	46	0	1	9	29	3	3	1
<b>\$26 to \$50</b>	16	0	10	4	1	1	0	0
<b>\$51 to \$75</b>	102	0	21	47	32	2	0	0
<b>\$76 to \$100</b>	31	0	0	2	13	7	8	1
<b>Impact on Tenant (TR) - Year 2</b>								
<b>Households with No Change</b>	31	1	1	15	10	4	0	0
<b>Households with a Decrease</b>	280	2	33	98	110	30	7	0
<b>Average Decrease</b>	\$29	\$17	\$25	\$29	\$28	\$43	\$23	N/A
<b>Households with an Increase</b>	407	0	58	155	149	26	17	2
<b>Average Increase</b>	\$37	N/A	\$35	\$30	\$40	\$46	\$61	\$73
<b>Dollar Decrease</b>								
<b>\$1 to \$25</b>	153	1	19	50	66	13	4	0
<b>\$26 to \$50</b>	81	1	13	34	24	7	2	0
<b>\$51 to \$75</b>	27	0	1	11	12	2	1	0
<b>\$76 to \$100</b>	10	0	0	2	5	3	0	0
<b>\$101 to \$150</b>	9	0	0	1	3	5	0	0

		Bedroom Size						
	All	0	1	2	3	4	5	6
Dollar Increase								
\$1 to \$25	183	0	29	82	60	9	3	0
\$26 to \$50	105	0	7	39	44	9	5	1
\$51 to \$75	64	0	22	21	16	1	4	0
\$76 to \$100	40	0	0	11	23	4	2	0
\$101 to \$150	15	0	0	2	6	3	3	1

# STEPPED RENT & ALTERNATIVE UTILITY ALLOWANCE IMPACT ANALYSIS – PUBLIC HOUSING

		Bedroom Size		
	All	2	3	4
<b>Total Number of Households</b>	51	20	21	10
<b>Number of Households with Utility Allowance</b>	48	19	19	10
<b>Annual Total Rent Roll</b>				
<b>Year 1 - Current Scenario</b>	\$200,268	\$75,120	\$70,800	\$54,348
<b>Year 1 - Stepped Rent (At Enrollment) and MTW Alt UA</b>	\$192,588	\$73,044	\$68,004	\$51,540
<b>Change in Total Rent Roll</b>	(\$7,680)	(\$2,076)	(\$2,796)	(\$2,808)
<b>Year 2 - Current Scenario</b>	\$210,996	\$78,264	\$75,612	\$57,120
<b>Year 2 - Stepped Rent and MTW Alt UA</b>	\$203,964	\$76,776	\$73,128	\$54,060
<b>Change in Total Rent Roll</b>	(\$7,032)	(\$1,488)	(\$2,484)	(\$3,060)
<b>Average TTP</b>				
<b>Year 1 - Current Scenario</b>	\$409	\$391	\$355	\$557
<b>Year 1 - Stepped Rent (At Enrollment) and MTW Alt UA</b>	\$409	\$391	\$355	\$557
<b>Change in Average TTP</b>	\$0	\$0	\$0	\$0
<b>Year 2 - Current Scenario</b>	\$427	\$405	\$375	\$581
<b>Year 2 - Stepped Rent and MTW Alt UA</b>	\$440	\$414	\$392	\$595
<b>Change in Average TTP</b>	\$14	\$9	\$17	\$14
<b>Impact on Tenant (TR)</b>				
<b>Year 1 - Enrollment</b>				
<b>Households with No Change</b>	3	1	2	0
<b>Households with a Decrease</b>	48	19	19	10
<b>Average Decrease</b>	\$23	\$13	\$24	\$37
<b>Households with an Increase</b>	0	0	0	0
<b>Average Increase</b>	N/A	N/A	N/A	N/A
<b>Impact on Tenant (TR) - Year 2</b>				
<b>Households with No Change</b>	1	1	0	0
<b>Households with a Decrease</b>	26	10	9	7
<b>Average Decrease</b>	\$24	\$14	\$24	\$37
<b>Households with an Increase</b>	24	9	12	3
<b>Average Increase</b>	\$9	\$8	\$10	\$9
<b>Dollar Decrease</b>				
<b>\$1 to \$5</b>	3	3	0	0
<b>\$6 to \$10</b>	2	0	1	1
<b>\$11 to \$25</b>	14	6	6	2
<b>\$26 to \$50</b>	3	1	1	1
<b>\$51 to \$100</b>	4	0	1	3
<b>Dollar Increase</b>				
<b>\$1 to \$5</b>	7	2	3	2
<b>\$6 to \$10</b>	6	4	2	0
<b>\$11 to \$25</b>	10	3	6	1
<b>\$26 to \$50</b>	1	0	1	0

### Projected Impact: Alternative Reexamination Schedule & Self-Certification of Assets

Activity No.	Description	Projected Impacts
3a	Alternative Reexamination Schedule for Households – Public Housing	<ul style="list-style-type: none"> <li>HC intends to apply triennial reexam schedules to Public Housing treatment group households. Overall, HC estimates that this will change will result in a small reduction in rent roll to account for the increases in income which may be greater than the increases in rent afforded when applying the stepped rent increase factor.</li> </ul>
3b	Alternative Reexamination Schedule for Households – HCV	<ul style="list-style-type: none"> <li>HC intends to apply triennial reexam schedules to HCV treatment group households. Overall, HC estimates that this will change will result in a small increase to account for the increases in income which may be greater than the increases in rent afforded when applying the stepped rent increase factor.</li> </ul>
Safe Harbor	Alternative Reexamination Schedules (Public Housing and HCV)	<ul style="list-style-type: none"> <li>In conjunction with activities 3a and 3b, HC has submitted a Safe Harbor Waiver as need to eliminate interim reexams for the rent reform treatment group. In lieu of interim reexams, HC has developed a Hardship Policy to mitigate any negative impacts on these households. HC does not project any financial impact as a result of this activity.</li> </ul>
Safe Harbor	Self-Certification of Assets at Admission	<ul style="list-style-type: none"> <li>HC projects that allowing the self-certification of assets up to \$50,000 at admission and reexamination will be rent roll and HAP neutral while having little or no impact on tenant rent.</li> </ul>



**Housing Connect  
MTW Waiver Impact Analysis  
Alternative Utility Allowance**

Under the Moving to Work (MTW) Operations Notice, MTW agencies, including Housing Connect are required to prepare an impact analysis as a “safe harbor” for certain activities proposed in the annual MTW Supplement. MTW agencies must prepare the impact analysis:

- Prior to implementation of the MTW activity, if required as a safe harbor;
- For certain activities as defined in the MTW Operations Notice on an annual basis during the implementation of the MTW activity;
- Prior to any Safe Harbor Waiver or Agency-Specific Waiver requests; and,
- At the time the MTW activity is closed out, if an impact analysis was previously required.

Housing Connect has prepared this impact analysis in conjunction with its first MTW Supplement for the fiscal year beginning on July 1, 2022. This analysis describes the projected impacts of the following proposed MTW waiver needed to implement the MTW alternative utility allowance (MTW Alt UA) described in the MTW supplement:

Activity No.	Description
1i	Alternative Utility Allowance – PH
1j	Alternative Utility Allowance - HCV

Overall, Housing Connect projects that the cumulative impact of the above-listed MTW activity will be:

- Beneficial to residents and program participants by providing either no change, small decreases or small increases in rent to the majority of residents and participants, while simplifying the process for determining affordability for HCV participants; and
- Supportive of Housing Connect’s efforts to streamline program operations by reducing administrative burdens on staff, residents and participants.

**1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)**

See response under #2 and impact analysis tables on pages 5 and 6.

**2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)**

The tables on pages 5 and 6 summarize Housing Connect’s preliminary projections of the impact of the MTW Alt UA on agency finances and existing families rents in the Public Housing and HCV programs. Note that the results of the rent reform random assignment process (and the incomes of participants at initial enrollment) are unknown at this time which limits Housing Connect’s ability to forecast financial impacts.

Compared to standard HUD Public Housing and HCV program utility allowance assignment and calculation methods, determination of utility allowances using Housing Connect’s MTW Alt UA is

projected to result in modest decreases and increases for the majority of families. Outlined below are points which summarize the impact. Please note that the analysis does not consider the impact that reasonable accommodation utility allowance requests will have on HAP, Rent Roll and/or tenant rent (TR) or utility allowance payments (UAP). Finally, the MTW Alt UA will apply to households in the treatment, control and excluded groups, except where regulatory exceptions apply.

### **Summary Results of Financial Impact – MTW Alt UA Only**

#### **MTW Alt UA Schedule**

The MTW AI UA schedule reflects the updated utility allowance schedules completed in April 2022. The UAs reflect the average UA by bedroom size for all HC families who are responsible for payment of one or more utilities.

	<b>Bedroom Size</b>					
	0	1	2	3	4	5
<b>Utility Allowance</b>	\$49	\$82	\$104	\$134	\$169	\$279

#### HCV Impact Summary

- There are 2,484 HCV families with utility allowances.
- HAP is forecasted to decrease \$72.
- 1,741 (70%) HCV families with utility allowances will experience either no change or a decrease in TR with the average decrease for those households being \$24.
- 743 (30%) HCV families with utility allowances will experience an increase in TRO with the average increase for those families being \$50.
- The increase in HCV TR is largely as a result of the decrease in utility allowance for families in single family and mobile homes and families who are responsible for most or all utilities. Additionally, families with increases in utility allowances which resulted in gross rents exceeding the payment standard also experienced increases in TR or decreases in UAPs.

#### Public Housing Impact Summary

- There are 198 Public Housing families with utility allowances
- Rent roll is forecasted to decrease by \$53,868.
- All of the Public Housing families (100%) with utility allowances will experience a decrease in tenant rent with an average decrease of \$26/month.
- The decrease in Public Housing TR is largely as a result of the MTW Alt UA schedule representing the average of utility allowances paid by both HCV and Public Housing families. Typically, Public Housing families, are not responsible for as many utilities as are HCV families.

### **Assumptions & Methodologies used in Financial Impact Analysis – MTW Alt UA**

- The MTW Alt UA was determined using the average utility allowance, by bedroom size, for all building types and all HCV and Public Housing families with utility allowances.
- The April 2022 UA schedule was applied to all UAs in determining the MTW Alt UA schedule, even though some of those families have not yet had a reexamination where the 2022 UA schedule was applied.



- TR, UAP, HAP and Rent Roll were calculated using existing incomes and UAs and were compared to the TR, UAP, HAP and Rent Roll calculated using existing income and the MTW Alt UA.
- The UA applied was the smaller of the unit size and voucher size. In the HCV program, there are 5 families in 6 BR units; however, none of those families have a 6 BR voucher. Accordingly, the MTW Alt UA schedule goes up to 5 BRs.

**3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**

Housing Connect does not expect that the proposed activity will have any impact on the agency's waitlist including on the amount of time families are on the waitlist

**4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

Housing Connect does not expect that the proposed MTW activity will have an impact on Housing Connect's termination rates for either the Public Housing or HCV programs.

**5. Impact on the agency's current occupancy level in Public Housing and utilization rate in the HCV program**

Housing Connect does not project that the proposed MTW activity will have an impact on current Public Housing occupancy rates or HCV utilization rates.

**6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

Housing Connect projects that the MTW Alt UA will have a positive impact on Housing Connect's administrative efficiency and provide a more simplified method for residents and participants to determine affordability, thus supporting the MTW goal of improving cost effectiveness.

**7. Impact on the agency's ability to meet the MTW statutory requirements**

Implementation of the proposed MTW activity is projected to have no impact on Housing Connect's ability to meet the five MTW statutory requirements. Housing Connect intends to fully comply with the MTW statutory requirements throughout its participation in the MTW Demonstration.

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

There are no hardship policy requirements related to the MTW Alt UA; however, households continue to be able to request reasonable accommodation utility allowances. Housing Connect cannot quantify the number of reasonable accommodation requests which may be made upon implementation of the MTW Alt UA; however requests are likely to increase. Housing Connect does not anticipate any change to the percentage of reasonable accommodation requests granted and denied as result of this activity.

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

Housing Connect does not projects any disparate impact on protected classes or any associated disparate impact on households as a result of this activity.

### MTW ALT UA IMPACT ANALYSIS – HCV

		Bedroom Size							
	All	0	1	2	3	4	5	6*	Elderly/ Disabled
Number of Households with Utility Allowances	2484	17	991	874	460	107	30	5	1,537
Annual Total HAP									
Baseline	\$23,840,100	\$93,888	\$8,504,880	\$8,247,912	\$5,245,620	\$1,286,328	\$364,608	\$96,864	\$13,954,596
MTW Alt UA Applied	\$23,840,028	\$94,152	\$8,473,824	\$8,271,372	\$5,258,520	\$1,290,828	\$356,412	\$94,920	\$13,935,564
Change in Annual Total HAP	(\$72)	\$264	(\$31,056)	\$23,460	\$12,900	\$4,500	(\$8,196)	(\$1,944)	(\$19,032)
Impact on Tenant (TRO/UAP)									
Households with No Change	213	5	32	86	61	18	10	1	97
Households with a Decrease	1528	7	598	581	279	59	4	0	954
Average Decrease	\$24	\$9	\$25	\$21	\$26	\$39	\$38	N/A	\$23
Dollar Decrease									
\$1 to \$25	1100	5	417	468	175	33	2	0	705
\$26 to \$50	266	2	116	65	76	7	0	0	157
\$51 to \$100	162	0	65	48	28	19	2	0	92
Households with an Increase	743	5	361	207	120	30	16	4	486
Average Increase	\$50	\$8	\$48	\$51	\$50	\$64	\$52	\$41	\$49
Dollar Increase									
\$1 to \$25	85	4	13	25	25	7	8	3	43
\$26 to \$50	175	1	150	14	8	2	0	0	143
\$51 to \$100	482	0	198	168	87	20	8	1	299
\$101 to \$150	1	0	0	0	0	1	0	0	1

\*All 5 families in 6 bedroom units have 5 bedroom vouchers

## MTW ALT UA IMPACT ANALYSIS – PUBLIC HOUSING

	Bedroom Size					
	All	1	2	3	4	Elderly/ Disabled
<b>Number of Households with Utility Allowances</b>	198	94	50	37	17	140
<b>Annual Total Rent Roll</b>						
Baseline	\$656,904	\$258,888	\$197,508	\$98,244	\$102,264	\$447,360
MTW Alt UA Applied	\$603,036	\$222,432	\$191,568	\$91,152	\$97,884	\$402,708
Change in Annual Total Rent Roll	(\$53,868)	(\$36,456)	(\$5,940)	(\$7,092)	(\$4,380)	(\$44,652)
<b>Impact on Tenant (TR/UAP)</b>						
Households with No Change	0	0	0	0	0	
Households with a Decrease	198	94	50	37	17	140
Average Decrease	\$26	\$33	\$12	\$23	\$32	\$27
Dollar Decrease						
\$1 to \$5	9	0	9	0	0	7
\$6 to \$10	0	0	0	0	0	0
\$11 to \$25	85	0	41	37	7	38
\$26 to \$50	104	94	0	0	10	95
Households with an Increase	0	0	0	0	0	0
Average Increase	N/A	N/A	N/A	N/A	N/A	N/A
Dollar Increase						
\$1 to \$5	N/A	N/A	N/A	N/A	N/A	N/A
\$6 to \$10	N/A	N/A	N/A	N/A	N/A	N/A
\$11 to \$25	N/A	N/A	N/A	N/A	N/A	N/A
\$26 to \$50	N/A	N/A	N/A	N/A	N/A	N/A

## 11. Public Comment & Action



## **MTW Supplement to the Annual Plan FY 22-23 Public Comment Summary**

### **Process:**

To seek public comment and feedback for Housing Connect's (HC) MTW Supplement for FY 22-23, an invitation was mailed to every household inviting them to either of our 2 resident meetings (1 daytime, 1 evening) and our public hearing. An additional email invitation was sent to every household with a viable email address on file. HC posted notice of these meetings in the two local newspapers (Deseret News & Salt Lake Tribune), on our HC website, the Utah Public Notice website, as well as provided a copy at our front desk reception area. After each meeting, a specific meeting was held to receive comment on our Agency Specific Waiver and our Safe Harbor Waivers.

HC hosted fifty-five residents either virtually or in person, this includes a follow up one on one meeting with a resident to provide information and receive additional comments. The majority of residents were HCV participants and a handful of Public Housing tenants.

HC also sought public comment from our MTW Advisory Committee; this committee is comprised of community partners, resident representatives, and HC staff. The MTW Advisory Committee has been instrumental in the development of all HC waivers and has been providing regular feedback since November 2021 in addition to the feedback they provided during the public comment period.

### **Feedback/Public Comment:**

Overall feedback and comments were positive regarding the stepped rent policy. Residents wanted to know how and when they would be informed what group they were in and seemed hopeful about the ability to keep more of their increased income in their household. Residents wanted to know what happens if they lose a job or get injured and are unable to work; HC staff provided more information and details regarding the Hardship Policy. One resident expressed concern and described the potential negative impact it could have if they were to be enrolled in the treatment group of the stepped rent policy and have their rent step up on an annual basis. This resident requested we not implement stepped rent. Later in a special one on one meeting with this resident and HC staff, the resident stated they do not meet the HUD definition of disabled but are disabled and unable to work and the increase in rent could be detrimental to not just their household but similar households or households who are most vulnerable.

For the majority of households, the implementation of the Alternative Utility Allowance will reduce or keep a residents rent the same. There is a smaller number of households who will see an increase in their rent portion at implementation. The MTW Advisory Committee expressed

concern for this group of households and asked for the consideration of methods to lessen the impact on households.

Many residents expressed concern regarding the ability to find a suitable unit within the payment standard and increasing costs due to inflation. HC made multiple referrals to our Housing Locator to provide support to each of these households. Various residents asked for additional resources regarding increasing their self-sufficiency or other community resources. HC was able to refer multiple residents to our Family Self-Sufficiency team.

**Agency Specific Waiver & Safe Harbor Waivers Feedback/Public Comment:**

No comments received regarding HC's Agency Specific Waiver or Safe Harbor Waivers.

\*Please find a comprehensive list of questions and/or comments received on the following pages.



## Public Comment Complete Overview

### 4/27/2022, 2-3 p.m. Resident Meeting

33 virtual attendees

- 1 Staff
- 2 Other Housing
- 21 HCV
- 5 Public Housing
- 2 Other

5 in person attendees

- 5 HCV

Comments/Questions:

1. In order to move, I have to first give a notice to vacate to my landlord, before even securing my next living unit. Most landlords don't want their unit to sit vacant for 30+ days in the meantime. is there a possibility of a week or two overlap? That seems backwards and is very difficult for me due to location restrictions based on disability. Also having a week to move from one location to the next would greatly simplify the moving process.
  - Response: We have not considered looking at the moving/notification process. We can check to see if this is something that HUD allows us to modify. Juanita is our housing locator and may be able to help.
2. The whole process makes me feel completely worthless, would like Housing Connect to not “enact this program”
  - Response: I am sorry you feel that way. Is there something we can do to help you? I would like to be able to understand your concerns. I believe Marni sent you an email suggesting a meeting. - A meeting has been set with this individual to address concerns.
3. What about households with a disability that aren't “officially disabled?” People who can't work, but aren't on SSI?
  - Response answered live: They could be randomly selected into the Stepped Rent Study but would have access to the hardship policy to address any hardship.
4. Hi I'm in a 3 bedroom I have 5 kids plus me and fiancé and we have to move soon but can't find anything in our price range how will we find something affordable?
  - Response: Provided name and number of our Housing Locator

5. Utility is just electric and gas right?
  - Response answered live: It could include other utilities as well
6. Question from the basement group. What considerations have been taken for inflation as we have higher inflation nationally as well as in our state.
  - Response answered live: That's something that we've been watching closely, and it's impacting a lot of a lot of staffing and work and budgets, and so for these budgets they're set by the Federal Government, and there's a there's a formula. So, there's a formula that HUD uses and then there's an inflation factor on that. We know that it probably won't be all of the costs that are associated with the programs but there's a Federal mechanism in place to handle the budgeting process. I was thinking about it budgetarily, but they might have also been talking about utilities, and in that case, there's a set time every year we look at the utilities, and we just looked at the utilities last month, and so we will do that again next year at this time and that's how we take into consideration the increase costs for that mechanism.
7. Question from the basement group: We have addressed two-bedroom but not one bedroom. is this program for both scenarios?
  - Response answered live: Proposed changes would apply to all household sizes.
8. Would the utility allowance be for all households?
  - Response answered live: It would be, it would be for all Public Housing and HCV.
9. If a person has an interview, what will the verification process be?
  - Response answered live: I am not sure what the verification will be but the FSS team will have that outlined and could inform you. (This question was pertaining to the changes in the Family Self-Sufficiency Program in regard to cash incentives for self-sufficiency milestones vs. escrow earned with an increase in TTP)
10. Is this program for the disabled?
  - Response answered live: All Disabled/Elderly households would be excluded from the rent study, but other waivers/changes may apply.
11. While you were talking about the examples, the question was, what are the cons of this?
  - Response answered live: That is a great question, and the biggest thing will be if a household's income is not increasing at all, a step up in their rent could be very difficult for them which is why we have the hardship policy in place. Another potentially negative outcome internally is that we don't know how many hardships requests we will be getting, and it may be that there are a lot. There are some things that we just don't know, and there are some things that HUD doesn't know as well which is why we're studying and evaluating this. Our hope, as far as our

agency goes, is that it provides a way for households to keep more of their income in their in their homes and frankly, to help them get ahead we know that it can be difficult when you get a raise your rent increases, and it's that's a difficult cycle to be in.

12. I have lots of questions. I was working at a dollar tree store, and then I switched to Walmart, so I would have to pay more, because it's just me my daughter living in a one bedroom apartment and I was going to transfer to another unit and then I was moving to another apartment, but she said somebody took it, but she said that my vouchers only for a one bedroom. So I noticed that into rent has increased, they said it increased 1,200, but the rents more than that. So my next question is, I was hearing about when I first started Section 8, as I was hearing about where you but then you become like a homeowner, but for some reason I was asking about that about a year ago. but No one didn't know what I was talking about. Is that still going on?

- Response answered live: Great questions. Let me answer your second question first. So probably why nobody knew what was going on about the home ownership program is because we're not currently running that program. But what I would say the family self-sufficiency program is a great foundation, and really the first step to home ownership. So if you're not connected with that team, I think Krysta can put that information in the chat and you can put my number in there.

We can also get you connected with the section 8 team/Housing Choice Voucher team. It does get a little confusing. We will get you connect with your housing specialists because they are really the experts they'll be able to talk through what can be done and try to help you figure out what's best for you and your family.

### **5/3/2022, 6-7 p.m. Resident Meeting**

9 virtual attendees

- All HCV

2 in person attendees

- 2 HCV

Comments/Questions: All questions in this session were answered live

1. When will we know what category we fall into?
  - Great question. You will know, a few months before your recertification date we're still working out exactly how this looks, but for a household that's already housed in one of our programs in the HCV program, or public housing when it's

your annual recertification date at that time as you're going through the recertification process.

2. What if we give employment, and a couple of months later, quit or get fired?
  - Great question. The hardship policy would come into play, so if at enrollment you were chosen to be in the stepped rent study, you had income, we set your rent based on your prior years income, and then, if a few months later, down the road, you lost the job or were fired or laid off, the hardship policy would come into play. At that point you would talk with your housing specialist. You would request a hardship rent, and we would go through the process of approving a hardship rent, which would be 40% of current income or for minimum rent, whichever is greater, and then that hardship rent would stay in place for 12 months, and after 12 months, if the circumstances were still the same, we would have the option to just reset your rent at that point and start stepping up your rent from there.
3. My re-certification is due in August. Will I not find out until august next year?
  - Yes, we don't have this approved we don't have any of these waivers approved to be able to implement. So when we start in fall of this year, we actually will be looking at households that have a recertification date of December, or possibly January of 2023. Hopefully, we're giving households enough time to think about this, to learn about it.
4. I was receiving a utility payment before I got a job. Since I got a job I stopped receiving it. Does that not apply to me anymore?
  - I think you're talking about receiving a utility check. The same principle with utility check would apply it's more so specific to your income and the utility allowance is part of the rent calculation we use.
5. If you already mentioned this. But will our rent go up? Just because the pandemic everything went up including rent.
  - I know there are a lot of barriers to finding affordable housing. We know finding a place that will take your voucher can be very difficult. Every year HUD does a study, and they look at what is affordable rent for a community, and then they give us a calculation and we can set rents right around that number, and we feel like sometimes HUD's calculation isn't great. When we know costs are increasing we'll see them increase as well, and then we also to make sure that we're keeping pace on the utility side. We also do a utility study every year and so those are 2 ways we try to keep pace with increasing numbers for increasing costs.

6. Can I pay the whole year that I would owe my landlord at one time?
  - You could work that out with your landlord. If you're paying your landlord an entire year's worth of veranda upfront, then you could do.
7. So about this program that that's coming up like, will our case worker get a hold of us, and if let us know if we fall into that program, because I think my recertification is in either June or July. But I did sign my third to your least which starts June first.
  - You probably won't hear anything until next year in the spring of 2023. So everything will likely stay the same for you until you go to recertify next year. It shouldn't impact the lease that you just signed even if you were enrolled into the stepped rent that still should not impact any lease that you have.
8. I want to see if housing has a way or has I don't know training classes or something to help like me just to try to get out of the program just because I know I need it but I know that there's people out there that need it more.
  - Check out our family self-sufficiency program, its goals are just what you're describing, and we have some staff there that can help you and point you towards education, help you with pre-employment, finance, budgeting that kind of thing. On our website you can do a search for family self-sufficiency it should come up, and I'm going to ask if Jarin or Krysta could drop Kelsie's number in into the chat and either one of those will get you to the right location.
9. I wanted to say thank you all for helping me and my family have a home, times are hard and I really appreciate this help!! I'm blessed thanks again. – via Email

**5/4/2022, 9:30-10:30 a.m. One on One Resident Meeting**

(Janice Kimball, Marni Timmerman, Ilez Brady & HCV Resident)

We were contacted by this resident from one of our community partners. We tried to set up a meeting prior to the public meetings but were unable to do so. This individual attended the first public meeting on 4/27/22 and expressed concerns regarding the potential increase in rent due to Stepped Rent. On May 4<sup>th</sup>, 2022 our agency had a special meeting with just this resident to hear the concerns are receive feedback. The following is a summary of the meeting.

- Resident stated it is hurtful to say we are excited about the rent study or other policies that simplify processes when they could have a negative impact on residents
- Resident stated he is unable to work and is disabled but does not meet HUD's definition of disabled and therefore could potentially be enrolled in the stepped rent policy and it would be detrimental to his situation/life

- Resident stated he is not just advocating for himself but also for others who are potentially more vulnerable and, in a situation, worse than him. Expressed concern that a change in rent could be tragic and expressed concerns about long-term consequences
- Resident asked about how the process would work if there was a late payment due to the increase of rent
- Resident had questions regarding the Alternative Utility Allowance and what the potential outcome would be

Staff were open to feedback and received all comments. Staff responded to each potential scenario or concern with the goal to validate and understand as well as provide clarification and explain policy. Staff asked to be able to connect resident with additional community resources that may be helpful, and resident was open and grateful for any resources available. Overall, the residents' concerns were validated and Housing Connect staff communicated to resident appreciation for his time and thanked him for feedback and informed him that it will be compiled into overall summary and presented to the RAB and Board or Commissioners.

#### **5/5/2022, 11-noon MTW Advisory Committee Meeting**

- 6 MTW Advisory Committee Members
  - VOA, The Road Home, Crossroads Urban Center, Salt Lake County
  - 2 Housing Connect Residents
  - 5 Housing Connect Staff

Housing Connect presented updated impact analysis for the stepped rent policy and detail regarding the alternative utility analysis and impact. The following feedback and/or suggestions were provided specific to the alternative utility allowance:

- Review Alt UA for SNAP & compare, partner to provide this information to staff
- Phase in the Alt UA over time to lessen impact
- Impact on households in single family home could be very significant
- Review Additional information and possibly run different scenarios for specific households who could be most impacted
- Is there an Alt UA range big enough to mitigate the impact for households on the higher end?

Housing Connect thanked attendees for insight and suggestions and stated that it will be compiled into overall summary and presented to the RAB and Board or Commissioners for further discussion.

## **5/6/2022, 10-11 a.m. Public Hearing**

5 virtual attendees

- All HCV

1 in person attendees

- HCV

Comments/Questions:

1. How do changes interact with FSS program?
  - Response answered live: All Disabled/Elderly households would be excluded from the rent study, but other waivers/changes may apply. FSS households would be excluded from the stepped rent policy and explained further changes re: specific changes in FSS.
2. What if we renew a new lease does it adjust for the increase?
  - Response answered live: The current process for landlord increases will remain the same. Annually we'll perform a utility allowance survey to account for increases or decreases that reflect the market.
3. A question I have had for a while is, does housing let you use your voucher towards getting a house?
  - Response answered live: Great question, at this point in time we don't have that ability. I think the best place to start with is working with family self-sufficiency. If you're looking at program regulations, it is allowable to use vouchers to help with the purchase of a home. We could look at it, I'd encourage you to start with family self-sufficiency and then go from there.
4. What if you get hurt and can't work?
  - Response answered live: The hardship policy would account for that situation. So if you get hurt and the injury is severe enough that you would not be able to work we would have a policy to address that.
5. Will the UA apply to my household?
  - Response answered live: The UA will but household will be excluded from stepped rent because of disability status.





## **MTW Supplement to the Annual Plan FY 22-23 Public Comment Action**

### **Action:**

All feedback and comments have been reviewed and considered by Housing Connect (HC) staff, Resident Advisory Board and Board of Commissioners. HC noted and discussed concern regarding stepped rent but is choosing to proceed with implementation. HC feels confident that individual concerns or negative impact can be addressed with the stepped rent Hardship Policy. HC will also continue to provide community resources and referrals on behalf of residents to ensure the most successful outcome possible for each household's individual circumstance. HC believes the evaluation of alternative rent policies are necessary to determine the best approach for long term resident self-sufficiency and is committed to the 6-year evaluation period.

After feedback from residents and the MTW Advisory Committee regarding the Alternative Utility Allowance (Alt UA), HC's Resident Advisory Board and Board of Commissioners have recommended that HC proceed with implementation of the Alt UA but with a phase in process for households who will experience an increase of \$50 or greater. They also recommended a hardship policy to address any potential household displacement due to the Alt UA.

The Resident Advisory Board minutes and the Board of Commissioner resolution with approval of the MTW Supplement to the Annual Plan FY 22-23 are attached in the following pages.



**The Mission of the RAB is to represent the interests of the residents receiving rent assistance from Housing Connect. The goal is to assist Housing Connect staff and Board of Commissioners to maintain and improve the quality of life for all residents.**

The Mission of Housing Connect is to provide and develop quality affordable housing opportunities for individuals and families while promoting self-sufficiency, empowerment, and neighborhood revitalization.



**Housing Connect  
Resident Advisory Board  
Meeting Minutes  
May 11, 2022**

Board Members Present:

Mary Ann Ericksen - Chair  
Kathy Larsen - Vice Chair  
Jamie Ramos - Treasurer  
Gwen White  
Carl Schettler  
Royal Miller

Board Members Not Present:

Housing Connect Staff Present:

Braidee Kolendrianos  
Janice Kimball  
Marni Timmerman

Welcome

Mary Ann welcomed RAB Members and Housing Connect Staff.

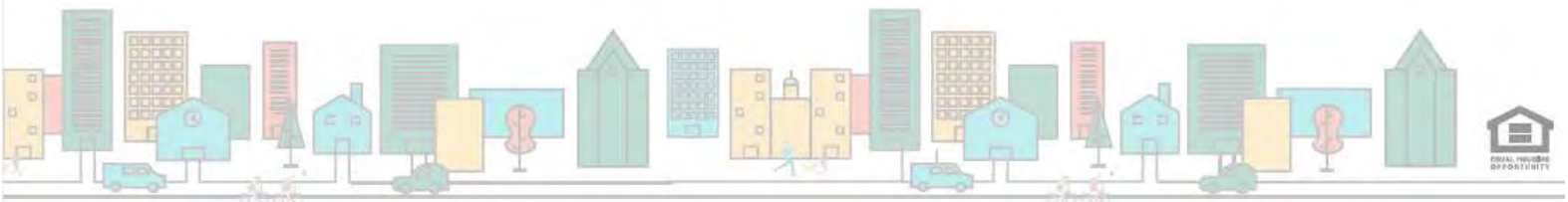
Reading of the RAB Mission

Braidee read the Resident Advisory Board Mission.

Minutes Review

Mary Ann referenced the minutes from the March 2022 RAB meeting and asked for any comments, questions, or changes. Jamie motioned to approve the minutes, Royal seconded the motion. Board approval was unanimous.

Housing Connect Update



Marni shared the proposed Moving to Work Supplemental Plan including the waivers to be submitted to HUD. Marni reported that Housing Connect completed an impact study to show the data of how stepped rent and a new utility allowance would affect residents. Mary Ann asked if residents of Housing Connect can request to be on the stepped rent study. Marni explained unfortunately no, it is a random selection study. Jamie asked how many households are currently eligible for the study. Marni shared that about 800 households are eligible. 400 households will be in the stepped rent group and 400 will be in the control group where nothing would change. Marni shared the current utility allowance formula and proposed the new utility allowance formula to simplify the process by taking the average of utilities paid by bedroom size. Janice noted this will affect all households. Marni shared the impact of the utility allowance on households. Jamie commented on her current situation and being impacted by this change. Janice and Marni gave examples of how the change will give households more money in rent availability, but a bit less in utility allowance. This utility allowance change will simplify the process of searching for a unit for households by allowing them to know exactly what to expect to pay. Marni shared with the RAB the feedback of public and MTW Advisory Board comments. During the discussion, Jamie recommended a hardship policy that could be requested by a household if the simplified utility allowance would cause dislodgement. In addition, the RAB recommended a phased-in implementation of the simplified utility allowance for households who would experience an increase of \$50 or more.

Royal motioned to approve the FY 22-23 MTW Supplement to the Annual Plan with the simplified utility allowance recommendations. Mary Ann seconded the motion. Board approval was unanimous.

#### Budget Review

Jamie reviewed the RAB budget up to date. Jamie asked for any questions from the RAB, there were no questions. Gwen motioned to approve the budget, Mary Ann seconded the motion. Approval was unanimous.

Jamie reviewed the proposed RAB budget for FY 2023. The RAB recommended an increase in travel. Braidee will get cost estimates for a travel budget based on recommended trainings.

#### BOC Report

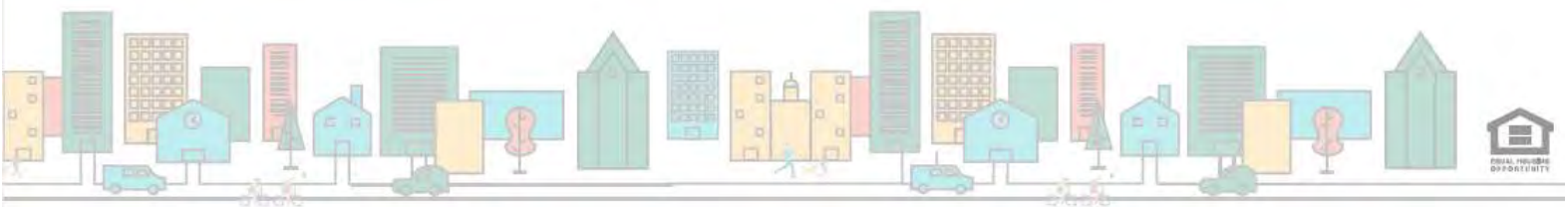
Gwen and Janice reported that the BOC discussed Budgets and MTW at the last meeting. Gwen shared Housing Connect is rehabbing Valley Fair Village with new roofs, driveways, and AC. Janice shared updates on the High Rise and Sunset developments.

#### Board Recruitment

Braidee updated the RAB on the current recruitment – the RAB received one application and will continue to send out the recruitment letter to new sites. Braidee will set up interviews with Mary Ann and Kathy.

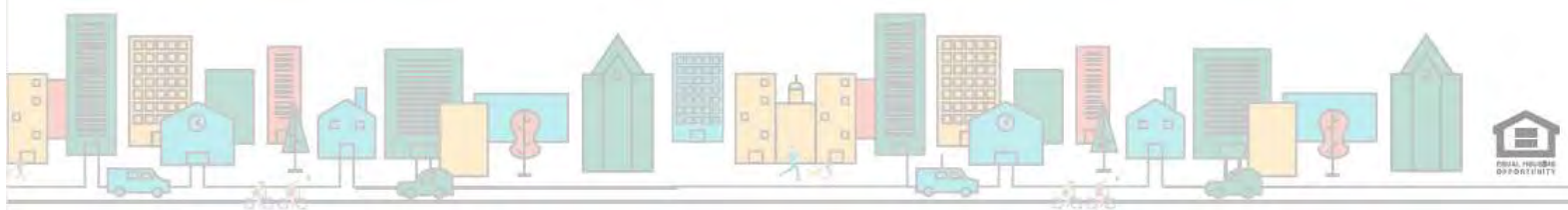
#### Other

Mary Ann suggested a tour of properties in July. Braidee will help confirm a day. Jamie shared her thoughts on the NAHRO Conference. The RAB would like to explore how to lobby for affordable housing.



### Next Meeting

The next meeting will be a tour in place of the meeting. Royal motioned to adjourn, Jamie seconded the motion.





## RESOLUTION #1060

### MOVING TO WORK SUPPLEMENT TO THE 2022-2023 ANNUAL PUBLIC HOUSING AGENCY (PHA) PLAN

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WHEREAS, Housing Connect has been designated as a Moving to Work (MTW) agency by the U.S. Department of Housing and Urban Development (HUD); and

WHEREAS, HUD requires MTW agencies to prepare and submit an MTW Supplement to the Annual Public Housing Agency Plan that describes proposed activities, initiatives and MTW waivers for each fiscal year and that includes a Board Resolution with Certifications of Compliance with Regulations; and,

WHEREAS, Housing Connect has prepared an MTW Supplement in accordance with HUD requirements and has provided opportunities for public review and comment including, but not limited to, publishing a public notice, conducting a public comment period from March 22 to May 5, 2022, conducting a public hearing on May 6, 2022 and taking in to consideration public and resident comments;

NOW, THEREFORE, Be It Resolved by the Commissioners of Housing Connect as follows:

Section 1. That the Board of Commissioners hereby approves the MTW Supplement to the Annual Public Housing Agency Plan for 2022-23 including the Certifications of Compliance with Regulations and authorizes the Chair and/or the Chief Executive Officer to: 1) Submit to HUD the MTW Supplement to the Annual Public Housing Agency Plan for 2022-23; 2) Execute the required Certifications of Compliance with Regulations in the form required by HUD; and, 3) Take all steps necessary to finalize and secure HUD approval and implement initiatives as described in the MTW Supplement, subject to receipt of adequate funding from HUD.

Dated this 18<sup>th</sup> day of May 2022.

A handwritten signature in blue ink, appearing to read 'Phil Bernal', written over a horizontal line.

Phil Bernal, Vice Chair

A handwritten signature in blue ink, appearing to read 'Janice Kimball', written over a horizontal line.

Janice Kimball, Chief Executive Officer

## 12.Certifications of Compliance



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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning 07/01/2022, 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.

Housing Authority of the County of Salt Lake  
(doing business as Housing Connect)

**MTW PHA NAME**

UT003

**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).*

JANICE KIMBALL

**NAME OF AUTHORIZED OFFICIAL**

SECRETARY / CEO

**TITLE**

J Kimball

**SIGNATURE**

JUNE 2, 2022

**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.*