

PHA Name : Hibbing

PHA Code : MN004

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 10/1/2021

PHA Program Type: Public Housing (PH) only

MTW Cohort Number: 1

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The vision of the Housing and Redevelopment Authority of Hibbing (HRA) is to seize every opportunity to develop and revitalize our community. Moving to Work (MTW) provides the HRA an incredible opportunity to become a more flexible, innovative and effective agency towards this goal.

After extensive listening to residents, agency staff, elected leaders, regional service providers, local businesses, legal counsel and other stakeholders, the HRA has determined the top long-term need of the community, and therefore the top goal of the agency's MTW programming, is to more effectively help residents reach economic self-sufficiency.

The HRA defines self-sufficiency as the ability of households to successfully graduate from public housing to either fair-market rental or private homeownership.

In the long term, the agency will consider a host of MTW waivers to incentivize, assist and reward graduation. This could include alternative recertification schedules, new rent schedules, term limits and escrow savings accounts.

However, after conversations with peer agencies, HUD officials and other housing policy experts, the HRA has decided to begin MTW programming in a deliberate and gradual manner. This approach will minimize confusion for residents and allow the agency to learn from a smaller number of new policies before taking on other challenges.

In the short term, the HRA will implement one new policy in Fiscal Year 2022: the EMPOWER Program. The EMPOWER Program will provide residents who are enrolled in the program with the educational, social, financial and career tools needed to successfully graduate from public housing. EMPOWER will be mandatory for nonelderly and nondisabled residents, but will also be available to all residents who would like to voluntarily enter the program.

The HRA MTW Coordinator will manage the EMPOWER Program. The MTW Coordinator will ensure residents understand their obligations in the program and help residents realize their true potential.

The EMPOWER Program will allow the HRA to further two of the statutory MTW objectives. First, families will better achieve and maintain economic self-sufficiency with the skills and opportunities provided by community partners in the program. Secondly, helping more families graduate from public housing will open new units for families currently struggling with housing insecurity and self-sufficiency. As the program grows more effective at graduating families, other low-income families on the HRA's long waitlists will have housing options.

The EMPOWER Program will be the HRA's first effort to improve resident well-being as an MTW agency. The HRA will modify, improve and/or discontinue its MTW programming as the agency learns from experience and resident feedback year after year.

In sum, the HRA has always been and will continue to be a vital part of the community's safety net. With MTW abilities, the agency will become more than a net; it will become a trampoline for households dreaming of moving upwards.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies
2. Payment Standards and Rent Reasonableness
3. Reexaminations
4. Landlord Leasing Incentives
5. Housing Quality Standards (HQS)
6. Short-Term Assistance
7. Term-Limited Assistance
8. Increase Elderly Age (PH & HCV)
9. Project-Based Voucher Program Flexibilities
10. Family Self-Sufficiency Program with MTW Flexibility
11. MTW Self-Sufficiency Program
a.PH Alternative Family Selection Procedures (PH) Currently Implementing
12. Work Requirement
13. Use of Public Housing as an Incentive for Economic Progress (PH)
14. Moving on Policy
15. Acquisition without Prior HUD Approval (PH)
16. Deconcentration of Poverty in Public Housing Policy (PH)
17. Local, Non-Traditional Activities

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

11.a.PH - Alternative Family Selection Procedures (PH)
<p>In January of 2022, the HRA will launch the EMPOWER Program. This program is made possible by exercising MTW Waiver #11a, "MTW Self-Sufficiency Program--Alternative Family Selection Procedures (PH)"</p> <p>As the name of the program indicates, the agency's goal for the EMPOWER Program is to empower residents with the tools and skills necessary for graduation from public housing. This program was designed through hundreds of hours of conversation with local housing and supportive service experts in government, nonprofits and the private sector. Resident feedback and advice from HRA staff were also crucial for identifying and addressing the needs of EMPOWER Program residents.</p> <p>A nonelderly and nondisabled resident who enters public housing will sign an agreement with their lease to comply with the Empower Program requirements. On this contract, which the resident will receive a copy of, will be printed the date and location of the first required meeting with the MTW Coordinator.</p> <p>At the first meeting, the MTW Coordinator will conduct an extensive Resident Needs Assessment. This will help both the Coordinator and the resident understand the resident's barriers to graduation and seek the appropriate resources for overcoming these barriers.</p> <p>In the first year of the program, residents in the EMPOWER Program will advance through a predetermined curriculum of four competencies deemed crucial for self-sufficiency by housing experts. These four areas are health, education, personal finance and employment. The resident must earn certificates in all four (4).</p> <p>To earn a certificate, the resident must complete a course of six sessions of one hour each with a community partner in each competency. Each course is offered multiple times a year, free of charge and on-site at HRA properties. Below are the specific courses:</p> <p>Core Competency: Health Course: Supplemental Nutrition Assistance Program Education (SNAP-Ed) Community Partner: University of Minnesota-Extension</p> <p>Core Competency: Personal Finance Course: Dollar Works 2: A Personal Financial Education Program</p>

Community Partner: University of Minnesota-Extension

Core Competency: Education

Course: Adult Basic Education Assessment

Community Partner: Arrowhead Economic Opportunity Agency

Core Competency: Career/Employment

Course: Interview, Resumes, Job Search and Other Basics of Meaningful Employment

Community Partner: Northeast Minnesota Office of Job Training

In addition to the educational courses, EMPOWER Program participants in their first year will meet with the MTW Coordinator a minimum of once each quarter to ensure the household is closely accompanied in the first year of acclimating to the program. In total, the time burden on a household in the program in one calendar year is four six-hour courses and four one-hour meetings for a total of 28 hours.

In the second year of EMPOWER, residents will once again meet with the MTW Coordinator to conduct a Resident Needs Assessment. This will allow the HRA to learn how residents advance over their barriers in the first year in the program, and how the program could be better structured towards this goal. Residents will meet a minimum of biannually with the Coordinator in the second year of the program. At this point, residents will have more flexibility to choose activities that best suit their needs. The residents will need to satisfy a "self-investment" monthly requirement, or an activity that helps prepare for graduation from public housing. This 8 hour requirement can be satisfied with education, job training or searching, chemical abuse therapy or other approved activities on a case-by-case basis. These Coordinator-approved activities will take the place of the generalized courses.

In the third year of EMPOWER, residents will meet with the Coordinator for a third Resident Needs Assessment. Residents will also be enrolled in classes on fair-market rental or first time homeownership through community partners like Habitat for Humanity of Northern St. Louis County. Residents will meet a minimum of biannually with the Coordinator in the third year of the program. Third year program residents will also serve as role models for new entrants, with speaking at events and mentoring other residents as an opportunity to meet their own EMPOWER Program requirement of "self-investment" hours per month.

After three years of managing the EMPOWER Program, the HRA will have accumulated enough experience and data to determine what a reasonable timeframe is for the average program participant to graduate from public housing. The program and its offerings will be improved over the years.

This MTW activity serves the following statutory objectives:

Self-sufficiency
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 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

N/A--Program Not Implemented Yet

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Hibbing MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

MTW Self-Sufficiency policy is mandatory for the following

The EMPOWER Program will be mandatory for all residents of the HRA who are between the ages of 18 and 62, and are not legally designated as disabled according to the Social Security Act or other relevant legislation.

New residents who meet this criteria will sign a one-page lease addendum agreeing to the terms of the program at move-in after January 1, 2022. At that time, they will also schedule their first meeting with the MTW Coordinator to understand the EMPOWER Program and discuss any concerns or questions.

Existing residents as of January 1, 2022, will also sign the same one-page lease addendum during their annual recertification. These residents will have ample opportunity to understand the program and discuss it with the MTW Coordinator before entering the EMPOWER Program.

Following the best practices of other MTW agencies like Keene Housing and Delaware State Housing Agency, the HRA of Hibbing will employ the “Three Strikes” rule for violations of EMPOWER Program requirements.

If a resident misses a required EMPOWER Program component with no previous attempt to explain or reschedule (“no call/no show”), they will receive a written letter explaining what they missed and how to work with the Coordinator in the future to reschedule an event in advance as needed.

If a resident misses a second required EMPOWER Program component with no explanation, the resident will receive a lease violation and a written letter from the HRA Resident Coordinator. This letter will explain the lease violation and encourage meeting with the MTW Coordinator at once.

Lastly, if a resident misses or declines a third required EMPOWER Program component with no prior notice, the resident will receive a letter from the HRA Executive Director that explains the resident can now be terminated from the public housing program for violation of the EMPOWER Program contract. The resident will have the opportunity to meet with the Executive Director and the MTW Coordinator to discuss if the resident is still interested in participating in the program or if another home would be a better fit.

The EMPOWER Program will be open to all HRA residents. If an elderly or disabled resident still wishes to voluntarily enter the program, they are free at any time to meet with the MTW Coordinator to discuss entering the program under a unique agreement.

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

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

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$844,772	\$844,772	\$0	2022-01-01

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	0

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

G.2	Establishing Reasonable Rent Policy.
<p>MTW agency did not established a rent reform policy to encourage employment and self-sufficiency The HRA intially planned to introduce in the coming year a stepped rent and a delayed income recertification policy that would encourage working families to grow their income. However, after extensive conversations with HUD officials and other housing policy experts, the HRA has decided to take a gradual approach to rollin g out MTW programming. After learning important lessons about encouraging resident self-sufficiency from the EMPOWER Program, within 3 years the HRA will pursue a rent reform under MTW.</p>	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
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To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

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

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

I.	Evaluations.
	Yes - This table lists evaluations of Hibbing'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
MTW Expansion Cohort #1 Evaluation	Abt Associates, Social and Economic Policy Division 6130 Executive Blvd. Rockville, MD 20852 www.abtassociates.com	2020-2022	None that the PHA is aware of at this time.

On Monday, June 28, 2021 the Housing and Redevelopment Authority of Hibbing (HRA) held the required public hearings on its MTW Supplement submission, including the required hearing on a safe harbor modification for the work requirement. 20 people attended, including HRA residents, board members, local leaders and neighbors. An additional 44 people viewed the live stream of the hearing on the HRA's Facebook page.

Below are the comments the HRA received at the general MTW Supplement hearing, with the HRA's response underneath each comment.

How will the county contribute to this program? When people work, they will lose benefits like the county's social safety net.

The HRA is very aware that residents who increase their income face a "double whammy" of higher rents and the loss of means-tested benefits. As a result, the HRA will only require income reexaminations for residents in the EMPOWER program once every two (2) years. This will allow residents time to grow income and build savings to prepare for the loss of some means-tested benefits as they gradually move toward a higher quality of life. The HRA has consulted closely with St. Louis County Continuum of Care (CoC) experts as it designed this path and will continue to work closely with the county to improve the program as needed.

Special Note 11/2/2021: This question was answered before the HRA revised and lowered the number of waivers it plans to introduce in the coming year. This feedback will inform the long-term design of MTW programming. The HRA has and will continue to work closely with St. Louis County to ensure EMPOWER Program residents are not punished for self-sufficiency efforts.

I have anxiety and depression. How will this program help with mental health barriers to success?

The HRA will prioritize discussions of mental health advocacy when hiring the new MTW Coordinator. The agency will ensure the Coordinator is deeply familiar with the mental health resources of the community and able to refer residents to the proper support in a quick and confidential manner. The HRA recognizes the importance of good mental health in reaching success. The HRA has established a close working relationship with Range Mental Health and will invite RMH representatives to EMPOWER program events to ensure residents always have a mental health resource.

Hibbing is a dying town. There aren't opportunities here.

The agency believes there is strong factual basis to dispute this narrative of local decline. For example, the Minnesota Department of Employment and Economic Development indicates that there were 7,102 job vacancies in Northeastern Minnesota at the end of 2020. As of summer of 2021, large local employers in Hibbing like Fairview Health count dozens of vacancies.

McDonald's has confirmed for the agency that they are currently hiring at nearly twice the minimum wage rate. The HRA's EMPOWER program will focus on connecting residents with these opportunities and/or connecting them to what they need to take advantage of these opportunities (such as training or interview practice with a partner like CareerForce).

I am with L&M Radiator. We have Walk-In Application Wednesdays, and we are desperate for people. This MTW program is great, and we are excited for the HRA to help more people get to the door of opportunity.

The HRA has appreciated the great enthusiasm by local employers about the EMPOWER program and all other MTW programming. The agency is excited to serve as a bridge between opportunity providers and opportunity seekers.

At what age does the proposed term-limits apply to current residents? Who is "grandfathered" in?

The term-limited assistance of seven years will apply to both all current and all new residents who are nonelderly and nondisabled. "Nonelderly" means residents are between the ages of 18 and 55 years old. Residents who are older than 55, and thus within 7 years of reaching HUD's "Elderly" designation of 62, have the option to opt-out of the term-limit. However, residents who choose to opt-out of the term-limit assistance due to age also must forfeit the EMPOWER Program's rent structure and other benefits.

Special Note 11/2/2021: This question was answered before the HRA revised and lowered the number of waivers it plans to introduce in the coming year. This feedback will inform the long-term design of an eventual term-limit policy, but is no longer relevant to what is proposed in the short-term for this MTW Supplement.

When I was homeless, I couldn't get the help I needed from the local United Way.

The HRA has worked diligently to educate all area service providers about MTW. If a resident expresses a need that the HRA cannot meet, the MTW Coordinator will be able to effectively connect that resident with the most appropriate service provider.

To understand, could a resident enter this program with zero income? And they would not be recertified for 2 years?

That is correct. For example, suppose an individual who was experiencing homelessness becomes a tenant. Suppose also this individual has no income of any kind. This person would pay minimum rent for the first two years of living in an HRA unit, even though and especially if they increased their income in that time. This is because their next regularly scheduled income recertification for calculating rent would not happen until two (2) years after move-in, to provide them maximum time to increase earnings without increasing rent.

Special Note 11/2/2021: This question was answered before the HRA revised and lowered the number of waivers it plans to introduce in the coming year. This feedback will inform the long-term design of an eventual delayed recertification policy, but is no longer relevant to what is proposed in the short-term for this MTW Supplement.

The current HRA rent calculation is 30% of gross income. How is this different?

For residents in the EMPOWER Program (all nonelderly and nondisabled), this rent structure is very generous on the “front-end”, or the first years of the ladder. A resident entering this rent structure will pay less than 30% of their income for the first four (4) years of the seven (7) year rent structure. This will allow them to save more of their earnings initially, giving them a foundation to grow towards paying fair-market rent.

Special Note 11/2/2021: This question was answered before the HRA revised and lowered the number of waivers it plans to introduce in the coming year. This feedback will inform the long-term design of an eventual stepped rent policy, but is no longer relevant to what is proposed in the short-term for this MTW Supplement.

8 months ago, I was told these programs wouldn't affect me. Now it seems that they will.

The plan presented today is the product of dozens of conversations with residents, community stakeholders, HRA staff, housing policy experts, HUD representatives and other MTW agencies. As a result, the specifics of who is affected and how by this programming has changed and evolved since the policy design process began last year. The HRA will ensure that, once approved by HUD, the final details of MTW programming are communicated clearly and frequently to all residents.

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Below are the questions received:

How will the county contribute to this program? When people work, they will lose benefits like the county's social safety net.

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I am with L&M Radiator. We have Walk-In Application Wednesdays, and we are desperate for people. This MTW program is great, and we are excited for the HRA to help more people get to the door of opportunity.

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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 (10/1/2021), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Housing and Redevelopment Authority of Hibbing, Minnesota

MN004

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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

Jacqueline Prescott

Executive Director

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

November 2nd, 2021

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.*



**Housing & Redevelopment
Authority of Hibbing**

**Board of Commissioners
Resolution Number 662**

Approve Move to Work Cohort #1 Application

WHEREAS, the US Department of Housing and Urban Development (HUD) has announced the application process for the first cohort of the Move to Work (MTW) expansion; and

WHEREAS, the MTW objectives are to reduce cost & achieve greater cost effectiveness in federal expenditures, give incentives to families whose head of household are either working, seeking work, or are participating in job training education or other programs that assist in obtaining employment and becoming economically self-sufficient, and to increase housing choice for low-income families; and

WHEREAS, the MTW designation allows housing authorities to design and test innovative, locally designed housing and self-sufficiency strategies, and allows flexibility in funding to design & test approaches; and

WHEREAS, MTW Cohort #1 applicants will consists of high-performing agencies that administer 1,000 or few housing choice vouchers and public housing units combined; and

WHEREAS, the Hibbing Housing Authority is eligible to apply for the MTW expansion cohort #1

NOW THEREFORE, BE IT RESOLVED, at a regularly scheduled meeting of the HRA of Hibbing's Board of Commissioners held on June 12, 2019 the Board approves the HRA of Hibbing to apply for the MTW Cohort #1 designation with the intention to comply with the MTW objectives and statutory requirements and the Operations Notice.

Approved this 12th day of June, 2019.

Motion by: Commissioner Swader

Supported by: Commissioner Nix

Ayes: 3

Nays: 0


Cynthia Kafut-Hagen
Board Co-Chair


Jackie Prescott
Executive Director



Housing & Redevelopment
Authority of Hibbing

Board of Commissioners
Resolution Number 2021-3

Commitment to Participate in the HUD-Sponsored Evaluation of the First Cohort of the MTW
Expansion.

COMMITMENT TO PARTICIPATE

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

Commitment to Participate in the HUD-Sponsored Evaluation of the First Cohort of the MTW Expansion

In addition to the elements described in PIH Notice 2018-17, HUD will provide additional scope and information about the HUD-sponsored evaluation of the first cohort of the MTW Expansion and any additional requirements that the PHA must adhere to.

Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I agree to ensure participation of the PHA in the HUD-sponsored evaluation of the first cohort of the MTW Expansion as described in PIH Notice 2018-17 understanding the following considerations:

- (1) The PHA must participate in the HUD-sponsored evaluation of the first cohort of the MTW Expansion whether or not it receives an MTW designation through the lottery process described in PIH Notice 2018-17.
- (2) In event the PHA is not selected to be in the treatment group, the PHA may apply to future cohorts of the MTW Expansion to which the PHA is eligible. Despite a potential designation under a future cohort, the PHA may continue to have obligations under the HUD-sponsored evaluation of the first cohort of the MTW Expansion as well.
- (3) The PHA will cooperate fully with HUD and its contractors for the duration of the HUD-sponsored evaluation of the first cohort of the MTW Expansion. Failure to comply with the HUD-sponsored evaluation of the first cohort of the MTW Expansion may affect the PHA's ability to apply to future cohorts of the MTW Expansion.

HRA of Hibbing, MN
PHA NAME

MN004
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).

Mark Gardeski
NAME OF AUTHORIZED OFFICIAL*

Chairman
TITLE

[Signature]
SIGNATURE

11/25/2020
DATE

* Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the PHA Board to do so. If this document is not signed by the Chairman or



Housing & Redevelopment
Authority of Hibbing

Board of Commissioners
Resolution Number 2021-4
Moving to Work Certifications of Compliance

CERTIFICATIONS OF COMPLIANCE

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

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

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

- (1) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure at least 75% of families assisted are very low-income as defined in Section 3(b)(2) of the 1937 Act throughout the PHA's participation in the MTW Demonstration Program.
- (2) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in establishing a reasonable rent policy that is designed to encourage employment and self-sufficiency.
- (3) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to assist substantially the same total number of eligible low-income families as would have been served absent MTW throughout the PHA's participation in the MTW Demonstration Program.
- (4) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program throughout the PHA's participation in the MTW Demonstration Program.
- (5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.
- (6) The PHA published a notice that a hearing would be held, that the application and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the application by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the application and invited public comment.
- (7) The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the application by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the application.
- (8) The PHA certifies that the Board of Commissioners has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (9) The PHA must certify that it will carry out its application in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d-2000d-4), the Fair Housing Act (42 USC 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 USC 794), and title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.), regulations implementing these authorities, and other applicable Federal, State, and local civil rights law and that it will affirmatively further fair housing, which means that

It will take meaningful actions to further the goals identified by the Assessment of Fair Housing conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Until such time as the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR part 91 the PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions. The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2).

- (10) The application is consistent with the applicable Comprehensive Plan (or any plan incorporating such provisions of the Comprehensive Plan) for the jurisdiction in which the PHA is located.
- (11) The application contains a certification by the appropriate State or local officials that the application is consistent with the applicable Consolidated Plan, which incorporates a fair housing strategy that reflects the jurisdiction's Assessment of Fair Housing or Analysis of Impediments to Fair Housing Choice, as applicable, and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
- (12) The PHA affirmatively furthers fair housing. A PHA shall 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 fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; (iii) Specifies actions and strategies designed to address contributing factors, related fair housing issues and goals in the applicable Assessment of Fair Housing (AFH) consistent with 24 CFR 5.154, in a reasonable manner in view of the resources available; (iv) Works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) Operates programs in a manner consistent consolidated plan under 24 CFR Part 91, and with any order or agreement, to comply with the authorities, specified in paragraph (o)(1) of this section; (vi) Complies with any contribution or consultation requirement with respect to any applicable Analysis of Fair Housing, in accordance with 24 CFR 5.150-5.180; (vii) Maintains records reflecting these analyses, actions, and the results of these actions; and (viii) Takes steps acceptable to HUD to remedy known fair housing and civil rights violations. PHAs that are not yet required to submit an AFH shall adhere to the requirements under 24 CFR 903.7(o) in effect prior to August 17, 2015.
- (13) The PHA complies with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (14) The PHA complies with the Architectural Barriers Act of 1968 and its implementing regulations at 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (15) The PHA complies with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (16) The PHA complies with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (17) The PHA complies with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (18) The PHA complies with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (19) The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (20) The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (21) 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.
- (22) The PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine

compliance with program requirements.

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

HRA of Hibbing
PHA NAME

MN004
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).

Mark Gardeski
NAME OF AUTHORIZED OFFICIAL*

Chairman
TITLE


SIGNATURE

11/25/2020
DATE

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