

PHA Name : Medford Housing Authority

PHA Code : MA015

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 10/1/2024

PHA Program Type: Combined

MTW Cohort Number: Asset Building

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

In September 2022 the Medford Housing Authority (MHA) was designated by the U.S. Department of Housing and Urban Development (HUD) as a Moving to Work (MTW) agency as part of the Asset Building Cohort. Participation in the MTW program, which extends for a twenty-year initial term, provides MHA with significant programmatic and financial flexibility and the ability to implement innovative solutions that address local needs and priorities. Activities and initiative proposed under the MTW program must meet at least one of the following statutory objectives: (1) Increase affordable housing choices; (2) Increase cost effectiveness; and/or (3) Promote resident self-sufficiency.

MHA utilizes MTW flexibility to build strong relationships with residents and resident organizations, streamline operations, provide expanded housing choices for voucher program participants, and support public housing residents and Housing Choice Voucher (HCV) program participants and their families in achieving self-sufficiency.

Pursuant to the HUD MTW Operations Notice, MHA is required to submit a MTW Supplement to the Annual PHA Plan that describes proposed MTW activities and waivers for the next fiscal year. As part of the Annual PHA Plan process, the MTW Supplement is posted for public review and comment, including a required public hearing(s), and is subject to review and approval by the MHA Board before submission to HUD.

In FY 2024 MHA was approved for and implemented activities related to rent reasonableness and inspections for MHA owned, managed, and/or controlled units, as well as establishing an alternative methodology for establishing rents for PBV program units. In addition, MHA began implementation of its local asset building program that seeks to encourage the growth of savings accounts for both Public Housing and HCV households and aims to build credit for Public Housing residents. See additional detail on each of these activities below. For its second full year of MTW participation, in FY 2025, MHA will continue implementation of previously approved activities. In addition, MHA intends to begin implementation of the following activities, each of which is further described in this MTW Supplement:

As a participant in the MTW Asset Building Cohort, which will evaluate asset building initiatives and their effect on assisted households in the public housing and HCV programs, MHA has begun implementation of a locally-designed asset building initiative that encourages the growth of savings accounts and aims to build credit for assisted public housing and HCV households, as applicable. Households may opt out of this program if they do not wish to participate. The components of this initiative include: 1) Savings Accounts & Financial Incentives; and 2) Credit-Building. As part of this initiative MHA has established savings accounts for 44 households to date (including both HCV and public housing) and will contribute \$50 per month to these accounts for a period of two years. Financial incentives such as bonus deposits for participation in financial literacy courses and budgeting workshops are available for participating households. Additionally, MHA will provide up to 50 public housing households with the opportunity to have their monthly rent payments reported to one or more credit bureaus. This will assist households in building and/or improving their credit scores for the purpose of furthering future goals such as homeownership. In the FY 2024 MTW Supplement HHA received HUD approval for cohort-specific waivers 5.1.a and 5.1.b that are needed to implement the asset building initiative. As required by HUD, the cohort-specific waiver requests were included in the FY 2024 MTW Supplement in the same way as agency-specific waivers; however, an impact analysis and hardship policy were not required.

In FY 2025 MHA is proposing and seeking approval on MTW activities related to alternative income inclusions/exclusions and increasing PBV program and project caps, as described below. These activities are intended to streamline and improve the cost effectiveness of program operations while expanding housing choices for HCV voucher holders and promoting resident and participant self-sufficiency.

Over the course of the coming year, MHA will continue to review and analyze other potential MTW Activities and intends to propose additional initiatives in future MTW Supplements.

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	
v. Alternative Income Inclusions/Exclusions (PH)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
4. Landlord Leasing Incentives	
5. Housing Quality Standards (HQS)	
c. Third-Party Requirement (HCV)	Currently Implementing
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
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
g. Increase PBV Rent to Owner (HCV)	Currently Implementing
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
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 Medford Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

1.v. - Alternative Income Inclusions/Exclusions (PH)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative This activity authorizes MHA to establish alternative policies to include or exclude certain forms of participant income during the income review and rent calculation process. Specifically, MHA is seeking to exclude the following income from calculation of annual income for Public Housing households at admission and reexamination: (1) Income received by MHA-assisted households participating in the MHA Tenant Coordinator (TC) program; and (2) Income received from Guaranteed Income pilot programs, as approved by MHA.
Which of the MTW statutory objectives does this MTW activity serve? Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Neutral (no cost implications)
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about

what has been accomplished or changed during the implementation.

This activity is being newly proposed for FY 2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

Yes

What is the status of the Safe Harbor Waiver request?

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

What inclusions or exclusions will be eliminated, modified, or added?

MHA will exclude the following income from calculation of annual income: (1) Income received by MHA-assisted households participating in the MHA Tenant Coordinator (TC) program; and (2) Income received from Guaranteed Income pilot programs, as approved by MHA.

1.w. - Alternative Income Inclusions/Exclusions (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

This activity authorizes MHA to establish alternative policies to include or exclude certain forms of participant income during the income review and rent calculation process. Specifically, MHA is seeking to exclude the following income from calculation of annual income for HCV assisted households at admission and reexamination: (1) Income received by MHA-assisted households participating in the MHA Tenant Coordinator (TC) program; and (2) Income received from Guaranteed Income pilot programs, as approved by MHA.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This activity is newly proposed for FY 2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

Yes

What is the status of the Safe Harbor Waiver request?

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

What inclusions or exclusions will be eliminated, modified, or added?

MHA will exclude the following income from calculation of annual income at admission and reexamination: (1) Income received by MHA-assisted households participating in the MHA Tenant Coordinator (TC) program; and (2) Income received from Guaranteed Income pilot programs, as approved by MHA.

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

MHA has used its MTW flexibility to eliminate the requirement for a third party to conduct rent reasonableness on MHA-owned or MHA-controlled units assisted with project-based vouchers. MHA has implemented this activity within the safe harbor limits established by the MTW Operations including the following: (1) MHA has established and made available a quality assurance method to ensure impartiality; (2) MHA has made 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; and (3) As needed and by request, MHA will obtain services of a third-party entity to determine rent reasonableness for MHA-owned units.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

PBV units that MHA owns, manages and/or controls.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

MHA is currently implementing this activity and is not proposing any changes to this activity for FY2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please explain or upload a description of the quality assurance method.

MHA conducts regularly scheduled supervisory quality control on a sample of units to ensure that rent reasonableness determinations performed pursuant to this waiver comply with program requirements. The annual sample of files or records is drawn in an unbiased manner and reviewed by an MHA supervisor (or by another qualified person other than the person who performed the original rent reasonableness determination). The sample size is consistent with the SEMAP sampling protocol as defined in 24 CFR 985.2. See attached description of the MHA Quality

Assurance method. Note that this document was originally submitted as part of the previous MTW Supplement.

This document is attached.

Please explain or upload a description of the rent reasonableness determination method.

See attached Quality Assurance method description. Note that this document was originally submitted as part of the previous MTW Supplement.

This document is attached.

5.c. - Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

MHA utilizes this waiver to conduct HQS/NSPIRE inspections on Project Based Voucher units that it owns, manages and/or controls as an alternative to having inspections conducted by a third-party. All such inspections are conducted using HUD HQS/NSPIRE inspection standards. To ensure the consistent and uniform application of HQS/NSPIRE standards, MHA supervisory staff conduct quality control inspections on a random sample of units in accordance with its inspection quality assurance method. Program participants may request an interim inspection by contacting MHA in accordance with the policies described in the Administrative Plan. If requested by HUD, MHA will obtain the services of a third-party entity to determine if MHA-owned units pass HQS/NSPIRE.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity applies to PBV units owned, managed or controlled by MHA.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

MHA is currently implementing this activity and does not have any planned changes to this activity in FY 2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please explain or upload the description of the quality assurance method:

Following will explain the quality assurance method

MHA conducts regularly scheduled supervisory quality control inspections on a sample of units to ensure that inspections performed pursuant to this waiver comply with program requirements. A sample of inspections is drawn in an unbiased manner and reviewed by an MHA supervisor (or by another qualified person other than the person who performed the original inspection). The sample size is consistent with the SEMAP sampling protocol as defined in 24 CFR 985.2. See

attached MHA Quality Assurance method which was originally submitted as part of the previous MTW Supplement.

This document is attached.

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

This activity will allow MHA to increase the number of authorized units that it project-bases. MHA will be authorized to project-base up to up to 50% of the lower of either MHAs total authorized units or annual budget authority.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

MHA will be authorized to project-base up to up to 50% of the lower of either MHAs total authorized units or annual budget authority.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about

what has been accomplished or changed during the implementation.

This activity is newly proposed for FY 2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

This activity will allow MHA to 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. MHA 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 HCV participants. In addition, MHA may eliminate or raise the project cap for projects located in high opportunity areas, City-designated revitalization areas, in conjunction with MHA-sponsored development activities and for other factors as determined by MHA. MHA will continue to be subject to the applicable provisions of PIH Notice 2013-28 or successor notices.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

MHA 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 HCV participants. In addition, MHA may eliminate or raise the project cap for PBV projects located in high opportunity areas, City-designated revitalization areas, in conjunction with MHA-sponsored development activities and for other factors as determined by MHA.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This activity is newly proposed for FY 2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

9.g. - Increase PBV Rent to Owner (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

MHA utilizes MTW flexibility to increase Project Based Voucher (PBV) rents to owners and to establish a local process to determine the initial and redetermined rent for PBV units. This activity waives certain provisions of section 8(o)(1)(B) and 8(o)(13)(H) of the 1937 Act and 24 CFR 982.503-505 and 983.301. The MHA local rent determination process allows MHA to establish rents for PBV developments located within zip code 02155 at the lowest of: (1) 110% of the applicable Small Area Fair Market Rent (SAFMR); (2) the reasonable rent; or, (3) the owner requested rent. All approved rents comply with program requirements for rent reasonableness, as modified pursuant to proposed MTW Activity 2.d.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all properties with project-based vouchers

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

MHA is currently implementing this activity and is not proposing any changes for FY 2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>Yes, the Safe Harbor Waiver request(s) for 1v, 1w is(are) attached.</p>

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No</p>

Agency-Specific Waiver(s) for which HUD Approval has been Received:

Does the MTW agency have any approved Agency-Specific Waivers?

Yes

E.2

Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
Asset Building Cohort-Specific Waiver 5.1.a.	No			
Asset Building Cohort-Specific Waiver 5.1.b.	No			
Required asset building waivers were approved in the previous MTW Supplement submission.	No			
Cohort-specific waivers as required for the Asset Building Cohort.	No			

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
2023	\$3,127,206	\$3,127,206	\$0	2031-09-30
2024	\$3,402,475	\$3,402,475	\$0	2032-09-30

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.
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? Yes	

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

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

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

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.
	Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

I.	Evaluations.
	No known evaluations.

Safe Harbor Waiver Request – Alternative Income Inclusions/Exclusions (MTW Activity 1.v. and 1.w.)

A. Safe Harbor Name & Number

Alternative Income Inclusions/Exclusions – 1.v. (PH) and 1.w. (HCV)

B. Implementing Regulation & Safe Harbor(s)

Statutes and Regulations Waived:

- Public Housing: Certain provisions of sections 3(a)(1) and 3(b)(4)-(5) of the 1937 Act and 24 CFR5.609, 5.611, 960.253, 960.255, and 960.257.
- HCV: Certain provisions of sections 3(a)(1), 3(b)(4)-(5), and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR5.609, 5.611, and 982.516.

Safe Harbor(s): Agency must exempt elderly and disabled individuals from this rent determination policy.

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

This activity authorizes MHA to establish alternative policies to include or exclude certain forms of participant income during the income review and rent calculation process. Specifically, MHA is seeking to exclude the following income from calculation of annual income for both Public Housing and HCV assisted households at admission and reexamination:

- Income received by MHA-assisted households participating in the MHA Tenant Coordinator (TC) program.
- Income received from Guaranteed Income pilot programs, as approved by MHA.

This activity supports the goal of increasing self-sufficiency of residents and participants.

D. Description of the Local Issue and Why Such an Expansion is Needed to Implement the MTW Activity

Under the Moving to Work (MTW) Operations Notice, MHA must exempt elderly and disabled individuals from the standard activity. However, elderly and disabled participants would benefit from this activity; therefore, MHA is requesting a safe harbor waiver to be able to apply this activity and policy to all public housing and HCV households, including elderly and disabled households.

E. Impact Analysis

See Impact Analysis attachment.

F. Hardship Policy

Not applicable. Implementation of the proposed activity is not projected to result in increased hardship for any participants.

G. Comments Received at the Public Hearing

MHA received the following comments related to this waiver during the public meeting process:

- A Resident Advisory Board (RAB) member in attendance commented that she believed the

income exclusion would be beneficial to Tenant Coordinators and residents of the MHA.

Safe Harbor Impact Analysis – Alternative Income Inclusions/Exclusions (MTW Activity 1.v. and 1.w.)

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.

MHA has prepared this impact analysis to describe the projected impact of the requested Safe Harbor waiver request related to implementing alternative income exclusions from income for Public Housing and Housing Choice Voucher (HCV) families.

A. 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 projected to have minimal impact on MHA finances.

Approximately 7 households currently receive income through the MHA Tenant Coordinator (TC) program, with an average income of \$2,309.

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

MHA does not project any impact on the affordability of housing costs for families.

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

MHA does not expect that the proposed activity will have any impact on the MHA waitlist including on the amount of time families are on the waitlist.

D. 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).

MHA does not expect that implementation of this activity will have any measurable impact on MHA termination rates for either the public housing or HCV programs. The current grievance/informal review/hearing policies provide participating families with the opportunity to dispute MHA calculation of income and rent.

E. Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program.

MHA does not expect that implementation of this activity will have any measurable impact on current public housing occupancy rates or HCV utilization rates.

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

MHA projects that this activity will have a positive effect on resident and participant self-sufficiency as it will incentivize and allow families to earn additional income without impacting their rent share.

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

Implementation of this activity is not projected to have a measurable impact on the ability to meet the MTW statutory requirements. MHA intends to fully comply with the MTW statutory requirements throughout its participation in the MTW Program.

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

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

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

MHA does not project any negative impacts including disparate impacts on protected classes as a result of implementing the requested safe harbor waiver.

MEDFORD HOUSING AUTHORITY

RENT REASONABLENESS METHODOLOGY – ACTIVITY 2.D.

The Medford Housing Authority (“MHA”) will perform rent reasonableness determinations on Project Based Voucher (PBV) units that are owned, managed and/or controlled by MHA.

Described below are the methods to be used to determine the rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area.

A. Description of Moving to Work (MTW) Activity

Pursuant to the MTW Operations Notice and upon approval of MTW waiver 2.d. MHA will be authorized to conduct rent reasonableness on PBV units that MHA owns, manages, or controls. Under this activity, MHA will adhere to the following guidelines:

- MHA shall establish and make available its QA method to ensure an objective analysis.
- MHA 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 described below.
- Upon HUD request, MHA will obtain the services of a third-party entity to determine rent reasonableness for MHA-owned units.

B. Rent Reasonableness Methodology

MHA will utilize a qualified consultant and/or independent database which will collect and maintain data on market rents in the MHA's jurisdiction. Information sources may also include owner rent rolls, newspapers, realtors, market surveys, inquiries of owners and other available sources. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes.

The data will be updated on an ongoing basis and rent information that is more than 12 months old will be archived on the MHA's shared drive and/or on the independent database. Market Rent Data greater than 12 months old will not be used for eligibility but may be used for reference.

How Rents Are Determined

- The rent for a unit proposed for HCV assistance will be compared to the rent charged for comparable units in the same market area. MHA will develop a range of prices for comparable units by bedroom size within defined market areas. Units proposed for HCV assistance will be compared to the units within this rent range. Because units may be similar, but not exactly like the unit proposed for HCV assistance, MHA may adjust the range of prices to account for these differences.
- The adjustment must reflect the local market. Not all differences in units require adjustments (e.g., the presence or absence of a garbage disposal may not affect the rent in some market areas).
- MHA uses a unit-to-unit comparison, by which the rent for a unit proposed for HCV assistance is directly compared to the rents for one or more unassisted units selected as comparables within the same market area. Geocoded maps will be used to identify the non-assisted units in closest proximity to the subject unit, and unit data information will be used to select the most similar units.

- In comparing rents, MHA will consider critical market factors that impact rent, including the location, quality, size, unit type, and age of the contract unit, as well as any amenities, housing services, maintenance and utilities to be provided by the owner in accordance with the lease.
- Where comparable units differ from the unit proposed for HCV assistance, MHA will determine whether those differences impact rent. Where they do, MHA will adjust the rental value of the comparable units, up or down, based on the market value of these factors. The rent for the unit proposed for HCV assistance will be compared to the adjusted rents for the comparable units, enabling a fair, accurate, market-based determination of rent reasonableness.
- Adjustments may vary by unit type (e.g., a second bathroom may be more valuable in a three-bedroom unit than in a two-bedroom). The adjustment must reflect the rental value of the difference – not its construction costs (e.g., it might cost \$20,000 to put on a new roof, but the new roof might not make any difference in what a tenant would be willing to pay because rents units are presumed to have functioning roofs).
- When a comparable project offers rent concessions (e.g., first month rent-free, or reduced rent) reported monthly rents will be adjusted accordingly. For example, if a comparable project reports rents of \$500/month but new tenants receive the first month's rent free, the actual rent for the unit would be calculated as follows: $\$500 \times 11 \text{ months} = 5500 / 12 \text{ months} = \text{actual monthly rent of } \488 .

MEDFORD HOUSING AUTHORITY

RENT REASONABLENESS QUALITY ASSURANCE METHOD – ACTIVITY 2.D.

The Medford Housing Authority (“MHA”) will perform rent reasonableness determinations on Project Based Voucher (PBV) units that are owned, managed and/or controlled by MHA.

To ensure the consistency and uniformity of these rent reasonableness determinations, MHA has established a Quality Assurance (QA) method in accordance with the policies described below.

A. Description of Moving to Work (MTW) Activity

Pursuant to the MTW Operations Notice and upon approval of MTW waiver 2.d. MHA will be authorized to conduct rent reasonableness on PBV units that MHA owns, manages, or controls. Under this activity, MHA will adhere to the following guidelines:

- MHA shall establish and make available its QA method, as described below, to ensure an objective analysis.
- MHA 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.
- Upon HUD request, MHA will obtain the services of a third-party entity to determine rent reasonableness for MHA-owned units.

B. Quality Assurance – General Principles

1. MHA operates its housing assistance program with efficiency and uses resources in a manner that reflects commitment to quality and service. MHA’s policies and practices are generally consistent with Section 8 Management Assessment Program (SEMAP) goals and objectives.
2. To demonstrate compliance with HUD and other pertinent regulations, MHA 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 MHA’s operational procedures and practices objectively and accurately.
3. Additionally, MHA will use the results reported in any independent audit (IPA) or HUD monitoring reports to identify potential program abuses as well as to assess the effectiveness of the MHA’s error detection and abuse prevention efforts.
4. MHA 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 MHA 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. MHA will investigate inconsistent information related to the family that is identified through file reviews and the verification process.

C. Rent Reasonableness Methodology

MHA will utilize a qualified consultant and/or independent database which will collect and maintain data on market rents in the MHA’s jurisdiction. Information sources may also include owner rent rolls,

newspapers, realtors, market surveys, inquiries of owners and other available sources. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes.

The data will be updated on an ongoing basis and rent information that is more than 12 months old will be archived on the MHA's shared drive and/or on the independent database. Market Rent Data greater than 12 months old will not be used for eligibility but may be used for reference.

How Rents Are Determined

- The rent for a unit proposed for HCV assistance will be compared to the rent charged for comparable units in the same market area. MHA will develop a range of prices for comparable units by bedroom size within defined market areas. Units proposed for HCV assistance will be compared to the units within this rent range. Because units may be similar, but not exactly like the unit proposed for HCV assistance, MHA may adjust the range of prices to account for these differences.
- The adjustment must reflect the local market. Not all differences in units require adjustments (e.g., the presence or absence of a garbage disposal may not affect the rent in some market areas).
- MHA uses a unit-to-unit comparison, by which the rent for a unit proposed for HCV assistance is directly compared to the rents for one or more unassisted units selected as comparables within the same market area. Geocoded maps will be used to identify the non-assisted units in closest proximity to the subject unit, and unit data information will be used to select the most similar units.
- In comparing rents, MHA will consider critical market factors that impact rent, including the location, quality, size, unit type, and age of the contract unit, as well as any amenities, housing services, maintenance and utilities to be provided by the owner in accordance with the lease.
- Where comparable units differ from the unit proposed for HCV assistance, MHA will determine whether those differences impact rent. Where they do, MHA will adjust the rental value of the comparable units, up or down, based on the market value of these factors. The rent for the unit proposed for HCV assistance will be compared to the adjusted rents for the comparable units, enabling a fair, accurate, market-based determination of rent reasonableness.
- Adjustments may vary by unit type (e.g., a second bathroom may be more valuable in a three-bedroom unit than in a two-bedroom). The adjustment must reflect the rental value of the difference – not its construction costs (e.g., it might cost \$20,000 to put on a new roof, but the new roof might not make any difference in what a tenant would be willing to pay because rents units are presumed to have functioning roofs).
- When a comparable project offers rent concessions (e.g., first month rent-free, or reduced rent) reported monthly rents will be adjusted accordingly. For example, if a comparable project reports rents of \$500/month but new tenants receive the first month's rent free, the actual rent for the unit would be calculated as follows: $\$500 \times 11 \text{ months} = 5500 / 12 \text{ months} = \text{actual monthly rent of } \488 .

D. Quality Assurance Protocol – MHA-Owned units

The following QA protocol applies to rent reasonableness determinations performed on MHA-owned units:

1. MHA staff will run the initial rent reasonableness determination at all required times (i.e. before HAP contract execution, before any increase in the rent to owner, if there is a 10% decrease in the published FMR in effect 60 days before the contract anniversary date, and/or as directed by HUD) utilizing the protocol and methodology described above.
2. All rent reasonableness determinations on MHA-owned units will require an additional level of review by a department supervisor.
3. Upon completion of the initial determination by the MHA staff person, the staff person will be required to obtain additional review and approval from a department supervisor before the rent amounts may be approved.
4. The department supervisor will review the information provided in the rent reasonableness software as well as the initial determination made by the staff person and will make a final determination on the approved rent amounts.
5. This second level of review will ensure that rent reasonableness determination of MHA-owned units is objective, consistent and compliant with all requirements and protocols.
6. If requested by HUD, MHA will obtain the services of a third-party entity to determine rent reasonableness for MHA-owned units.

MEDFORD HOUSING AUTHORITY
FY 2025 ANNUAL PHA PLAN AND MTW SUPPLEMENT
PUBLIC COMMENT AND MHA RESPONSES

The Medford Housing Authority (MHA) requested public review and comments and conducted public meetings and a hearing on MHA's FY 2025 PHA Annual Plan including the Moving to Work (MTW) Supplement, HCV Administrative Plan and Admissions and Continued Occupancy Plan Updates in accordance with HUD requirements:

- The public comment period extended from May 20, 2024, through July 3, 2024.
- The Medford Housing Authority held two Resident Advisory Board meetings throughout the FY 2025 Federal Annual Plan process including the MTW supplement, HCV Administrative Plan and Admissions and Continued Occupancy Plan Updates. These meetings also discussed the Capital Fund Program Five-Year and Annual Action Plan. Additionally, the MHA Resident Services Department continues to present and discuss MHA's MTW activities with community partners. These meetings were held on March 6, 2024, and June 27, 2024.
- MHA conducted a public hearing on July 3, 2024.

At the public meeting, MHA staff presented an overview of the FY 2025 Annual PHA Plan, the MTW Supplement, HCV Administrative Plan, and Admissions and Continued Occupancy Plan Updates.

MHA reviewed the Annual PHA Plan elements including continued plans for repositioning its public housing portfolio, planned modernization and development initiatives, and various other management initiatives. Regulatory and policy updates were explained and identified as part of the Plan as it relates to HOTMA, NSPIRE, and VAWA. MHA also reviewed its Resident service activities and how the MTW designation aligns with the MHA's goals and objectives.

In addition, MHA reviewed the MTW Supplement elements noting that this is the second MTW Supplement, which is required as part of the Annual PHA Plan process for agencies that are part of the MTW Expansion program. It was indicated that, as a participant in the MTW Asset Building Cohort, which will evaluate asset building initiatives and their effect on assisted households in the public housing and HCV programs, MHA has begun to implement a locally designed asset building initiative that encourages the growth of savings accounts and aims to build credit for assisted public housing and HCV households, as applicable. Households may opt out of this program if they do not wish to participate.

The components of MHA's Asset Building Initiative include: 1) Savings Accounts & Financial Incentives, and 2) Credit-Building. To date, MHA has established savings accounts for 44 households (including both HCV and public housing) and will contribute \$50 per month to these accounts for a period of two years. MHA will offer additional financial incentives in year 2 for participating households such as bonus deposits for participating in financial literacy courses and budgeting workshops. In addition, by Fall of 2024, MHA aims to provide up to 50 public housing households with the opportunity to have their monthly rent payments reported to one or more credit bureaus. This will assist households in building and/or improving their credit scores for the purpose of furthering future goals such as homeownership.

It was noted that the MTW Supplement includes the following proposed waivers for FY 2025: 1) Alternative Income Inclusions/Exclusions (MTW Activities 1.v. and 1.w.), which authorizes MHA to include or exclude certain forms of participant income during the income review and rent calculation process; 2) Increase PBV Program Cap (MTW Activity 9.a.), which authorizes MHA to increase the number of authorized units that it project-bases; and 3) Increase PBV Project Cap (MTW Activity 9.b.), which authorizes MHA to 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. These activities are intended to streamline and improve the cost effectiveness of program operations while expanding housing choices for voucher holders and promoting resident and participant self-sufficiency.

It was also noted that over the coming years, MHA intends to utilize MTW flexibility to benefit residents and program participants and to support the agency's mission and strategic objectives.

Public Comments and MHA Responses

During the public meetings and hearings, MHA provided a forum for open discussion among MHA residents and members of the public. Over the course of the discussions, participants raised several questions and issues. The questions/issues and MHA's responses and decisions are summarized below:

- RAB Members and other residents present thanked the MHA staff for the information presented at the meeting and for keeping residents informed throughout the redevelopment process for both the Saltonstall and Walkling Court developments.
- A RAB member in attendance commented she was pleased to hear the MHA's focus on communication with residents as there are many changes at the MHA and with HOTMA.
- A RAB member in attendance commented that she believed the income exclusion would be beneficial to Tenant Coordinators and residents of the MHA.
- Q: What is the primary funding for MHA?
A: 80-90% of our funding comes from HUD.
- Q: How do residents benefit from the conversion to Project-Based Section 8?
A: Rent is calculated similarly. The benefit is that the property will be more accessible through redevelopment, and residents will be housed in a new unit. MHA reinforced that Project-Based Section 8 is different from the Housing Choice Voucher program as so far as the PBV voucher will be the new unit and not a unit residents will have to find in the rental market.
- Q: Are waitlist preferences nationality-based?
A: No, we do not have nationality-based preferences. Our portfolio has historically reflected the Medford population. As part of a Fair Housing Marketing Plan, we may market to populations who are underserved, but all applicants go through the same application process and waitlist.
- Q: (HOTMA Changes to the Plan) Is there a document that will show these changes?
A: Yes, Policy changes are included in the Annual Plan. There will be meetings for all residents and one-on-one meetings to discuss individual changes as the implementation date nears.
- Q: (HOTMA Changes to the Plan) Will this impact Medicare?
A: If your Medicare goes up, it may not fully be deducted from your rent calculation based on the medical deduction threshold. There is no impact on your Medicare status.
- Q: (Possible replacement of power grid at LaPrise) Would the power lines go underground?
A: It is too expensive to put the power lines underground. It would also cost more to do maintenance on underground power lines.

MHA indicated that the agency welcomes the involvement of residents and community stakeholders in shaping agency plans, priorities and policies through the Annual PHA Plan and MTW Supplement process and looks forward to an ongoing constructive dialogue to expand housing opportunities and services to MHA residents, MHA HCV program participants and the Medford community.

In addition to comments received during the public meetings and hearings, MHA received written comments from Greater Boston Legal Services.

Comment(s): see attached

MHA response: Thank you so much for your comments and suggestions in response to our Federal Annual Plan/MTW Supplement. The Medford Housing Authority is committed to our residents and applicants and appreciate your suggestions of ways that we can further assist everyone in our community. We conducted an internal audit of our Walkling Court residents last summer and were able to confirm that no residents at Walkling Court will be displaced as part of the conversion to federal housing due to immigration status. MHA appreciates your suggestions of other funding mechanisms to assist current residents and applicants.

Jennifer McNabb

From: Kotwani, Chhaya <CKotwani@gbls.org>
Sent: Wednesday, July 3, 2024 2:25 PM
To: Contact MHA
Cc: McCreight, Mac; Mendonca, Mary Lu; Hegel, Susan; Ehrlich, Hed
Subject: Comments to the Federal Annual Plan/MTW Supplement

Hello,

Thanks for the opportunity to provide comments. Greater Boston Legal Services would like to provide the following comment regarding MHA's policy for immigrant households:

MHA has noted that it is undertaking the redevelopment and federalization of Walkling Court, its sole remaining state public housing development and is considering expanding its federal portfolio using its Faircloth authority (including developing family units at Walkling). While we commend the MHA's redevelopment and expansion of affordable housing, we strongly encourage the MHA to adopt policies to ensure its federal portfolio is accessible to immigrant households who do not have HUD required immigration status.

Whereas in state public housing a family's immigration status does not matter, to be eligible for most federal housing programs, including Section 8 project-based vouchers, at least one person in the household must be a citizen or an eligible noncitizen. In addition, mixed status immigrant households (i.e. households with at least one person who does not have eligible immigration status) have to pay pro-rated rent, where the subsidy received by the household is pro-rated by the number of household members with eligible immigration status and is thereby often unaffordable.

While there are no statistics available as to families with eligible immigrant status, Walkling Court, and Medford generally have a large immigrant population. We urge MHA to conduct a thorough analysis regarding the number of families whose eligibility or rent will be affected due to their household members' immigration status upon federalization of Walkling Court.

Walkling Court is an elderly/disabled site with only 1 bedroom units and thus likely has a large number of one-person households who may be at risk of losing their right to return altogether if they do not have eligible immigration status. MHA should identify and develop alternate housing programs to ensure there is no permanent displacement of such households.

In addition, given that MHA has plans to expand its federal family portfolio at Walkling and other sites, in lieu of charging pro-rated rent, we recommend MHA use its MTW flexibilities to adopt a \$5 per month rent surcharge for mixed status households across its federal portfolio. This will significantly reduce the amount of rent increase mixed immigrant households will face and their risk of permanent displacement. At a minimum, MHA should adopt a policy similar to EOHLC and its development partner, the Cambridge Housing Authority, where mixed status households pay a 10% surcharge on rent that would be due if it were not a mixed immigrant household.

Given that there will be no state public housing left within MHA's portfolio after Walkling Court's federalization, the MHA will have very few housing units accessible to low-income immigrant households without the required HUD immigration status. Therefore, MHA should consider using state vouchers and

developing programs, such as a local voucher program with priority for those without HUD immigration status, using its non-federal funding.

Best,

Chhaya

Chhaya Kotwani, Esq.
Staff Attorney, Housing Unit
Greater Boston Legal Services
(617) 603-1653
Pronouns: she, her, hers

**MEDFORD HOUSING AUTHORITY
200 BOSTON AVENUE, SUITE G-200
MEDFORD, MASSACHUSETTS 02155**

TELEPHONE 781-396-7200

www.medfordhousing.org

**EXTRACT OF MINUTES
REGULAR MEETING OF MEMBERS
MEDFORD HOUSING AUTHORITY
HELD ON
JULY 10, 2024**

At the Regular Meeting of the members of the Medford Housing Authority held on Wednesday, July 10, 2024 at 12:08 p.m., a quorum being present, the Chair Caileen Foley, presented the following item for consideration:

7. New Business

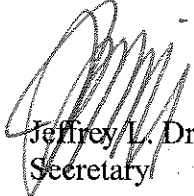
c) Resolution No. 2024-013

Consideration of request by the Executive Director to approve the Moving to Work (MTW) Supplement to Annual PHA Plan FYB24.

Upon a motion by Commissioner Hollien, Jr., duly seconded by Commissioner Lister, it was unanimously voted to accept the request by the Executive Director to approve the Moving to Work (MTW) Supplement to Annual PHA Plan FYB24.

A True and Correct Copy

Attest:


Jeffrey L. Driscoll
Secretary



EQUAL HOUSING OPPORTUNITY

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 (10/01/2024), 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.

Medford Housing Authority

MA015

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).

Caileen Foley

Chair Board of Commissioners

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

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