2015 Annual MTW Plan

Portage Metropolitan Housing Authority (OH 031)

State Route 59 Ravenna, OH 44266

Submission Date: November 20, 2014

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SECTION I: INTRODUCTION

LONG TERM GOALS

Portage Metropolitan Housing Authority seeks to develop itself as a top-quality local government entity with the mission of integrating community services that will assist non-disabled, non-elderly residents in continual economic improvement leading to either homeownership or private market housing; and for elderly and disabled residents, PMHA seeks to provide decent, safe and affordable housing as a matter of choice for each household.

To accomplish the long-term vision, PMHA seeks to continual improvement in streamlining the delivery of housing to low-income families and individuals through improvements in efficiency and effectiveness within its own resources offered by the Federal Government, by developing new, non-governmental sources of funding that will assist in achieving the vision and mission of the housing authority, and through cooperation and collaboration with community partners to leverage resources and strengths to better housing and living conditions for all persons living with Portage County, Ohio.

In this effort, Moving to Work is expected to remain a critical element of achieving these goals. PMHA is committed to developing a rent calculation system that is easier to administer and understand without compromising the agency's commitment to the integrity of federal funds. In addition, PMHA envisions a rent system that remains affordable to low-income households, but also provides incentive and encouragement to people working to the best of their abilities to improve themselves and removes systemic incentives for people to remain unemployed.

Also, the Moving to Work vision includes removing barriers to rational property management decisions, allowing the agency to administer its real estate inventory with solutions appropriate to the mission. What works in Windham or Ravenna, Ohio may not be the same solution for Cleveland, Ohio or Washington, DC. Local, informed decision-making has brought PMHA to the high performer status it has earned under HUD evaluation to this day; PMHA seeks to provide one example of "how to" that might serve as an example for other housing authorities in finding solutions. PMHA does not seek to provide THE example because the agency is committed to the value that local decision-making will free the creativity of housing authority boards and staffs throughout the nation. Government employees are as motivated as private sector employees to see their communities thrive; Moving to Work is critical to demonstrating and utilizing that motivation at Portage Metropolitan Housing Authority.

SHORT TERM GOALS

Portage Metropolitan Housing Authority establishes the following goals and objectives for 2015:

- 1. Maintain and Expand Excellence in Property Management
 - PMHA will operate Public Housing to the level of a High Performer.
 - PMHA will expand the number of units within its portfolio of housing.

- 2. Achieve and Maintain Excellence in Tenant-Based Housing Programs
 - PMHA will continue to achieve program results equating to High Performer status.
 - Tenant-based housing programs will achieve and maintain full lease-up.
 - Six households will become new homeowners through the Housing Choice Voucher Homeownership Program in 2015.
- 3. Improve Productivity and Cost Effectiveness
 - Further development and enhancement of the Yardi software system to better manage PMHA programs and operations.
- 4. Collaborate with Community Partners to Leverage Resources to Benefit Households Assisted by PMHA and Portage County
 - PMHA will investigate opportunities to develop and/or manage permanent supportive housing.
 - PMHA will investigate methods of inter-agency cooperation that will lessen barriers to assistance for applicants and participants.
 - PMHA will seek to expand partnerships that improve community housing activities for all citizens.

SECTION II: GENERAL HOUSING AUTHORITY OPERATING INFORMATION

						II.	1.Plan	.HousingSt	tock			
				Α	. мт	W Pla	n: Ho	using Stoc	k Information			
		Pl	anne	l New	Publi	c Hou	sing Un	its to be Ad	lded During the	Fiscal Year		
										# of UFAS Units		
AMP Name and			Bec	Iroom	Size			Total	Population	Fully Accessible	Adaptable	
Number	0	1	2	3	4	5	6+	Units	Type *	rully Accessible	Adaptable	
OH031000001	0	0	0	0	0	0	0	0	NA	0	0	
East Side												
OH030100002 West Side	0	0	1	1	0	0	0	2	General	1	1	
T	La I D. J	LI:- 11		11-24-		A J J -			2			
101	cai Pui	DIIC H	ousing	Units	to be	Adde	a		2			
* Select Population	Type f	from:	Elder	ly, Disa	abled,	Gener	al, Eldei	rly/Disabled,	Other			
	If	Othe	r, plea	se des	cribe:	NA						
		ı	Planne	ed Pub	lic Ho	using	Units t	o be Remov	ved During the F	iscal Year		
PIC Dev. # / AMP		Num		Units	to be				Explanation	on for Removal		
and PIC Dev. Name			Rem	oved					- April 1			
OH031000001												
East Side				0						NA		
OH030100002				0						NA		
West Side				U						IVA		
Total Number of												
Units to be				0								

	Anticipated Number of New Vouchers to be Project-Based *	Description of Project							
Phoenix	8	One bedroom apartments in Raver	na for persons with mental illnes						
Harvest Rose	30	Two bedroom apartments in	Ravenna for Senior Citizens						
Maple Brook	30	One and two bedroom apar	tments for seniors in Kent.						
Anticipated Total New Vouchers to be Project-Based	68	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	180						
		Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year	153						
	Other Changes to the F	lousing Stock Anticipated During the Fis	cal Year						
PMHA expects to take		pusing for at least part of 2015 for substa were older homes when acquired by PMI							
	ther changes can include but are ostantial rehabilitation and poter	e not limited to units that are held off-line outial plans for acquiring units.	lue to the relocation of residents, u						
	ostantial rehabilitation and poter								

	II.2.Plan.Leasing	
В	. MTW Plan: Leasing Information	

Planned Number of Households Served at	the End of the Fis	cal Year	
MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/ Leased***	
Federal MTW Public Housing Units to be Leased	283	3398	+
Ü			+
Federal MTW Voucher (HCV) Units to be Utilized	1562	18745	
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	8	96	
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0	
Total Households Projected to be Served	1853	22239	

st Calculated by dividing the planned number of unit months occupied/leased by 12.

Reporting Compliance with Statutory MTW Requirements

If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.

Not Applicable

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
NA	PMHA does not anticipate significant issues related to the leasing of Public Housing, Housing Choice Vouchers or non-traditional units.

^{**} In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.

^{***}Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

Wait List Information Projected Housing Program(s) * Wait List Type Housing Choice Vouchers - MTW Community-W MTW Public Housing Community-W Rows for additional waiting lists may be added, if needed.	Wait List or Closed*** During the Fiscal Year Vide 2247 Closed No Vide 2242 Open Yes al MTW Housing Choice Voucher Program; Federal non-MTW Housing
Housing Program(s) * Housing Choice Vouchers - MTW Community-W MTW Public Housing Community-W Rows for additional waiting lists may be added, if needed. * Select Housing Program: Federal MTW Public Housing Units; Federal Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing May be added to the select Housing Units; Federal Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing MTW Housi	Number of Households on Wait List Open, Partially Open the Wait List During the Fiscal Year Vide 2247 Closed No Vide 2242 Open Yes
Housing Choice Vouchers - MTW Community-W MTW Public Housing Community-W Rows for additional waiting lists may be added, if needed. * Select Housing Program: Federal MTW Public Housing Units; Federal Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing MTW Hou	Number of Households on Wait List Open, Partially Open or Closed*** Vide 2247 Closed No Vide 2242 Open Yes All MTW Housing Choice Voucher Program; Federal non-MTW Housing
Rows for additional waiting lists may be added, if needed. * Select Housing Program: Federal MTW Public Housing Units; Federa Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Lists and Local Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Lists and Local Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Lists and Local Choice Voucher Units; Tenant-Based Local Choice Choi	Vide 2242 Open Yes al MTW Housing Choice Voucher Program; Federal non-MTW Housing
Rows for additional waiting lists may be added, if needed. * Select Housing Program: Federal MTW Public Housing Units; Federal Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Hou	al MTW Housing Choice Voucher Program; Federal non-MTW Housing
* Select Housing Program : Federal MTW Public Housing Units; Federa Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Hou	
Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Hou	
For Fartially Open wait Lists, provide a description of the population	tions for which the waiting list is open.
If Local, Non-Traditional Housing Program, please describe:	
in Local, Non-Hauthonal Housing Program, please describe:	

If Othe	er Wait List Ty	pe, pleas	e describe	2:										
РМНА	A also operate	s a HUD-	VASH vou	ucher pro	ogram in	conjunc	tion with th	ne Veterans A	dministratio	on. This p	rogram do	oes not ha	ve	
a waiting list, but takes referrals from the VA as they arrive from the VA's "Interest List."														
	re are any char	_	e organiza	ational st	ructure of	the wai	t list or polic	y changes reg	garding the v	wait list, pro	ovide a na	rrative		
	re are any char ling these chan	_	e organiza	ational st	tructure of	the wai	t list or polic	cy changes reg	garding the v	wait list, pro	ovide a na	rrative		
		_	e organiza	ational st	tructure of	the wai	t list or polic	cy changes reg	garding the v	wait list, pro	ovide a na	rrative		
		_	e organiza	ational st	tructure of		t list or police	cy changes reg	garding the v	wait list, pro	ovide a na	rrative		
		_	e organiza	ational st	tructure of			cy changes reg	garding the v	wait list, pro	ovide a na	rrative		
		_	e organiza	ational st	tructure of			cy changes reg	garding the v	wait list, pro	ovide a na	rrative		
		_	e organiza	ational st	tructure of			cy changes reg	garding the v	wait list, pro	ovide a na	rrative		

SECTION III: PROPOSED MTW ACTIVITIES

PH-13 Residents paying ceiling rents may self-certify income.

This activity would allow residents who are paying ceiling rents to self-certify their income for the purposes of the re-verification process. These families would be paying the same rental amount regardless of the amount of their income, so there is no financial incentive to deceive PMHA as to the amount of their annual income.

This activity would assist PMHA in achieving the statutory objective of reducing costs and achieving greater cost effectiveness in federal expenditures, by reducing/eliminating the amount of time involved in verifying resident household income when the results of that verification are not meaningful in determining rental amounts charged.

PMHA anticipates that the activity could be implemented by March 2014, assuming approval by January 1, 2015 by HUD and with implementing resolution by the PMHA Board in January 2015.

CE #1 Agency Cost Savings											
Unit of Measurement	Baseline	Benchmark	Outcome								
Total Cost of Task in dollars	\$2,100	\$175	Savings of \$1,925								

PMHA will use internal data of time for the task, time saved and number of affected families to determine cost savings.

The activity is permitted through authorizations described in Attachment C, Section C (4) of the Restated Agreement and 24 CFR 966.4, and 24 CFR 960.257.

SECTION IV: APPROVED MTW ACTIVITIES IMPLEMENTED ACTIVITIES

HCV-1 Restrict portability moves out of Portage County for the Housing Choice Voucher Program

Approved and Implemented: 2009

Families seeking to move out of Portage County are permitted to utilize portability to any jurisdiction if the receiving jurisdiction were willing to absorb the household. If the receiving jurisdiction chose to bill PMHA, the family could port to that jurisdiction only if the receiving jurisdiction had payment standards or fair market rents less than or equal to Portage County (Akron MSA). This restriction does not apply to portability moves out of Portage County that are justified under laws and regulations applicable to reasonable accommodations for disability and to federal Violence Against Women Act provisions.

PMHA does not anticipate make any changes or modifications to this activity in 2015.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

HCV-2 Amend the Homeownership Voucher Program to include households who are Restrict portability moves out of Portage County for the Housing Choice Voucher Program

Approved and Implemented: 2010

Homeowners under foreclosure would be permitted to participate in the Homeownership Voucher Program to assist in resolving issues with the bank/mortgage company seeking foreclosure. The activity has discussed with the referral agency potential candidates, but to date it has provided no referrals for the activity, which remains a part of the Administrative Plan and PMHA prepared to administer.

PMHA does not anticipate make any changes or modifications to this activity in 2015.

PMHA anticipates having 1-3 referrals in 2015 for this program, as the referral partner agency has changed its staffing and structure for homeownership foreclosure assistance programs and new relationships are being developed.

HCV-3 Initial rent burden cap of 70% of adjusted monthly income. Approved and Implemented: 2014

PMHA utilizes a 70% initial rent burden cap for families that desire to expand their housing choices available to them in Portage County, enabling them to choose a greater portion of their income for the purposes of meeting housing expenses.

PMHA does not anticipate make any changes or modifications to this activity in 2015.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

HCV-4 Project-Based Housing Choice Voucher Program
Approved and Implemented: 1999, with additional authorizations granted and implemented in 2009.

PMHA operates a project-based voucher program under a different set of rules and regulations than those provided for under the standard HUD rules for project-based vouchers.

PMHA does not anticipate make any changes or modifications to this activity in 2015.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

HCV-5 Alternative Housing Quality Standards Compliance Approved and Implemented: 2011.

PMHA permits HCV landlords to use the successful results of municipal housing/rental housing licensing inspections as an alternative to PMHA Housing Quality Standards, where available, with the goal of minimizing intrusion on landlords and tenants subjected to multiple housing inspections annually.

PMHA is examining the need and usefulness of this activity for 2015 in light of the new regulations on HQS inspections issued by HUD applicable to all Housing Choice Voucher programs, specifically, the ability to conduct HQS inspections every two years instead of annually.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015, if this activity is retained as is.

HCV-6 Time Limits

Approved and Implemented: 2013 approval, 2014 implemented.

PMHA has established time limits for the Housing Choice Voucher program. Participants who are able to work (i.e., not considered elderly or disabled, or are a parent of a child under age 1) are expected to work or attend an approved school program, or they will lose a month of eligibility of HCV assistance. Each individual is granted 36 months of unemployment/non-participation in education. When an individual reaches the end of their 36 months, they will be considered ineligible for housing assistance for no less than one year, and all rent calculations for the household will be calculated on a pro-ration basis similar to the treatment given to other households with ineligible members.

PMHA does not anticipate making changes to this activity in 2015.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

HCV-8 Transitional Housing Vouchers Approved and Implemented: 2012.

PMHA has designated up to 48 vouchers for use as a transitional housing voucher, permitting one year of non-renewable voucher assistance, supplemented with supportive services intended to move the families to self sufficiency during the year. This program served as a replacement for a transitional housing program formerly located in one of its public housing developments, but which proved costly for unit turnovers and experienced cuts in supportive service provision.

PMHA will examine, with its partner agency, if the program continues to serve a need during a trend to permanent supportive housing that discourages the traditional transitional housing model.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015, if this activity is retained through the end of 2015.

HCV-9 Elimination of Deductions in Total Tenant Payment Calculations Approved and Implemented: 2014.

PMHA has eliminated dependent, elderly and disabled deductions as well as allowances for unreimbursed child care and medical expenses, and set the new calculation for rental amounts at 29.6% of total income. Current participant families are subject to having their total tenant payment increased by no more than \$30 in the first year of implementation as a hardship consideration across the board for all families.

PMHA has started this activity late 2014, and is uncertain whether any need to make adjustments to the policy to account for unintended consequences.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

HCV-10 Biennial Reviews for Non-Elderly/Non-Disabled Households Approved and Implemented: 2014.

PMHA will conduct re-verification reviews no less than every 24 months for any family designated as a non-elderly, non-disabled household, instead of the typical standard requiring an annual review.

PMHA has started this activity late 2014, and is uncertain whether any need to make adjustments to the policy to account for unintended consequences. Some families will experience an annual review in 2014 and 2015, and not experience this activity until 2016, as PMHA is staggering implementation so as to have a consistent work flow.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

HCV-11 Permit Households at \$0 HAP to Self-Certify Income Approved and Implemented: 2014.

PMHA permits households who reach \$0 monthly HAP to self-certify their income, as there are administrative benefits to this activity and the participant gains no financial benefit by misrepresenting their income to the housing authority.

PMHA has started this activity late 2014, and has no reason to believe this activity will be changed in 2015.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

HCV-12 Use Lesser of Actual Unit Size or Unit Size of Voucher Issued for Utility Allowances

Approved and Implemented: 2014.

PMHA uses the lesser of the actual unit size leased by the household, or the unit size of the voucher for the purposes of applying utility allowances.

PMHA has started this activity late 2014. It was proposed prior to the change in regulation by the Department of Housing and Urban Development. PMHA may evaluate whether its system is preferable to the guidelines established by HUD, and if it is deemed that HUD's approach is preferable, it will adopt the HUD method as an administrative relief.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

HCV-13 Extend the \$0 HAP Period to 12 months Approved and Implemented: 2014.

PMHA allows households who reach \$0 HAP amounts to remain on the Housing Choice Voucher program for 12 months instead of the regulatory 6 month period.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

HCV-15 Change the Allocation of Interest Earned for the Housing Choice Voucher Family Self Sufficiency Program

Approved and Implemented: 2014.

PMHA will use interest earned on FSS program escrow accounts for the purposes of supplementing lease-up activities, rather than allocate those funds to the escrow accounts.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

PH-2 Maximum Rent

Approved and Implemented: 2009.

PMHA has set a maximum rent for its Public Housing units that is meant to create naturally formed mixed income communities within its developments, with some administrative burden lifted and to encourage resident self sufficiency.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

PH-4 Change in Employment Income

Approved and implemented in 2009.

Changes in employment income are not counted towards rent amounts until the next regular recertification.

PMHA will review this activity in light of budgetary developments for HUD out of the political process, but does not anticipate changing it in 2015.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

PH-5 Rent Adjustments for Income Decreases

Approved and implemented in 2009.

This activity limits rent adjustments for temporary and relatively small income decreases, providing an administrative efficiency to PMHA.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

PH-6 Overall Percentage of Income Amounts for Rent Calculations Approved and implemented in 2009.

PMHA uses a rent calculation that uses 26% of earned income, rather than the 30% rate applied to other income sources, in order to promote work activity and to account for both payroll taxes and the removal of an allowance for unreimbursed child care expenses.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

PH-7 Eliminate Allowance for Non-Reimbursed Childcare Expenses Approved and implemented in 2009.

PMHA does not provide any allowance for tenants with non-reimbursed child care expenses that assist them in being able to work, as both an administrative efficiency and as an attempt to reduce potential opportunities for fraud. Instead, employment income is given preferential treatment in rent calculations.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

PH-10 PMHA to Operate Group Homes as Public Housing Approved and implemented in 2009.

PMHA had, for many years, operated group homes as Public Housing. One was a home for persons with mental illness, and the other building was built to house and support persons with developmental disabilities. Both activities were HUD-approved long before Moving To Work, but concerns over their current eligibility forced PMHA to ask for MTW waivers to operate the programs as they had before.

In 2011, the development disability home, Washington Group Home, lost its services provider and its residents. An attempt was made under MTW to re-purpose the facility for housing for young adults who had aged out of foster care, but the experiment failed as only 2 young adults

chose to live in the building (which has 8 bedrooms). In 2013, HUD approved an MTW plan that permits PMHA to rent the building in total for less than one year at a time to a local non-profit that gets funding from the local Mental Health and Recovery Board to treat and house men recovering from alcohol and drug addictions, primarily heroin addictions. Over 50% of participants now complete the program, a first for Portage County and only possible through Moving to Work and the use of otherwise un-marketable resources to meet community needs. The program was recognized with awards from the city Chamber of Commerce for its innovation.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

PH-12 Exclusion of overtime, bonuses and income from bank assets Approved and implemented in 1999.

PMHA does not count overtime income, bonuses and bank asset income in the rent calculation process.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

PH-13 Cap on Dependent Child Deduction

Originally approved and implemented in 1999, but re-stated and implemented for Public Housing in 2014..

PMHA will cap Public Housing dependent allowances to two, instead of the unlimited number permitted in the conventional Public Housing program.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

B-2 Utility Allowance Payments are used to repay participant debts owed to the Housing Authority

Approved and implemented in 2009.

PMHA will not send out utility allowance payments to tenants and participants who have debts owed to the Portage Metropolitan Housing Authority. These funds, until the debt balance reaches zero, will be withheld as part of a repayment agreement.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

B-3 Pro-ration of the Utility Allowance Schedule up to the Percentage of Proration of Funding Established by HUD

Approved and implemented in 2009.

PMHA reserves the right to pro-rate the utility allowance schedule for Public Housing and Housing Choice Vouchers in response to pro-rated funding from appropriations by Congress to the Department of Housing and Urban Development.

PMHA has no reason to expect a need to change any aspect of this activity. It has used this activity in Public Housing; PMHA has not chosen to use this activity for the Housing Choice Voucher program, but reserves its authority to do so as needed.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

B-8 Verifications of Income Valid for 180 Days Approved and implemented in 2014.

PMHA will permit information obtained during income verifications to be valid for as long as 180 days for both Public Housing and Housing Choice Vouchers.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

B-9 Eliminate All Excluded Income from the Income Verification Process Approved and implemented in 2014.

PMHA will not conduct any activity to verify income amounts from sources that are not applicable to the rent/assistance determination process.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

B-10 Elderly and Disabled Rent Recertifications Every Three Years Approved and implemented in 2014.

PMHA will conduct an income recertification no less than every 36 months for households designated as elderly or disabled.

PMHA has no reason to expect a need to change any aspect of this activity.

PMHA does not anticipate making any changes or modifications to metrics, baselines or benchmarks during 2015.

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NOT YET IMPLEMENTED ACTIVITIES

B-7 Adoption of Local Investment Policies

Proposed and approved in 2014, PMHA has not as of this writing implemented the new local investment policies, but expects to submit for Board approval a new policy by the end of 2014. This activity will allow PMHA to invest in a state government program for state and local governments in Ohio that permits pooled collateralized investment that obtains higher interest rates than is typically available to PMHA on its own, and remains completely liquid as an asset as well.

As stated above, this activity will be approved as policy in 2014, and will allow for investment decisions in 2105 based on this new policy.

No changes are expected to the original activity proposed.

ACTIVITIES ON HOLD

HCV-7 Capped Utility Reimbursement Checks

Approved in 2012, this activity was intended to eliminate "double dipping" for utility costs by setting utility allowance reimbursement maximums based on the State of Ohio's PIPP Plus program, a program that subsidizes low-income households' utilities by allowing them to pay utility bills on the basis of income, not on the amount of service used. However, these same families were eligible for and receiving utility reimbursement checks with the intention to pay off their entire month's utility bill.

This activity has been placed on hold as PMHA works with its software provider to ensure rent calculations and utility allowance checks are accurately performed and issued.

PMHA intends to revisit this activity in 2015 and determine if the cost for software changes is appropriate and affordable for the value gained from the activity. A decision will be reached for a final decision on this activity by July 1, 2015.

No changes have been made to this activity since originally approved.

HCV-14 Permit Decreases in Payment Standards at Next Scheduled Verification
Approved in 2014, this activity would permit the housing authority to reduce payment standards
on existing participant households at the next scheduled verification, rather than the established
HUD schedule.

This activity has been placed on hold as PMHA has had no need to reduce payment standards since the establishment of this activity.

PMHA will review HUD fair market rents and local rental market conditions each year, in relation to budgetary constraints, to determine whether payment standards need to be reduced in a year. If payment standards are not reduced, the activity remains on hold.

No changes have been made to this activity since originally approved.

CLOSED OUT ACTIVITIES

PH-1 Escalating Minimum Rent Approved by HUD and implemented in 2009.

PMHA planned to established a schedule of minimum rents that would start at \$25 per month and increase every two years by \$25.

PMHA discarded the activity after recognizing that its implementation was unduly administratively burdensome and was not expected to accomplish the goals of encouraging work activity and self sufficiency. Other rent reform activities with more promising results made this activity undesirable.

The activity was closed out in 2011.

PH-3 Elderly and Disabled Household Rent Recertifications Biennially Approved by HUD and implemented in 2000.

PMHA was conducting rent recertifications for elderly and disabled households every two years, instead of annually.

PMHA expanded the activity in 2014 and was re-named as Activity B-10.

The activity was closed out in 2014.

PH-8 Deduction for Elderly and Disabled Adults Approved by HUD in 2009, but never implemented.

PMHA was considering increasing the deduction from income from \$400 to a higher amount as part of a larger rent reform.

PMHA never implemented this idea. It was intended to be included as part of a larger rent reform initiative, but was ultimately not included due to cost and funding reasons.

The activity was closed out in 2014.

PH-9 Providing Transitional Housing Approved by HUD and implemented in 1999.

PMHA had approval to use some of its Public Housing inventory in conjunction with a non-profit partner to use as transitional housing for the homeless with a two-year time limit.

This activity was phased out in its entirety in 2013, and PMHA now provides some transitional housing assistance through a MTW activity in the Housing Choice Voucher program. The onsite, project-based program proved to be costly to PMHA due to higher turnover and lower resident rent income than its typical developments, and the funding for transitional housing from HUD and other sources had progressively declined as the emphasis shifted nationally to a "Housing First" model.

The activity was closed out in 2013.

PH-11 Deduction for Absent Child Approved by HUD in 2009..

PMHA had approval to provide a dependent deduction to households that were paying child support for a child living in another subsidized household.

This activity was not implemented as it became clear that PMHA would have substantial difficulties in implementing and maintaining the activity administratively. The number of households that had split families and both families receiving Public Housing assistance at the same time was also minimal at best. The most frequent, and burdensome to families, scenario was that some subsidized families pay child support to families not being subsidized for housing, and thus not eligible for the activity.

The activity was closed out in 2013.

B-1 Cap on Dependent Child Deduction Approved by HUD in 1999 for both Public Housing and Housing Choice Vouchers.

PMHA was capping the dependent child deduction to two, regardless of the number of children in the household for both Public Housing and Housing Choice Vouchers.

This activity was changed in 2014 and the cap removed on Housing Choice Voucher families as part of the 2014 rent reforms in that program.

The activity was closed out in 2014 for the Housing Choice Voucher program and is renamed and included as a current activity above for Public Housing.

B-4 Single Fund Budgeting with Full Flexibility for Eligible Funds Approved by HUD and implemented in 2009.

PMHA was authorized to use single fund budgeting and full fungibility for specified funds under the restated MTW agreement, and has used this authority in limited measures since.

In discussions with the MTW office in preparing the 2014, it was determined that this activity is no longer considered an MTW activity for the purposes of the current activities section of this plan, and will no longer be reported as such.

The activity was closed out in 2014 as stated in the paragraph above.

B-5 Income Verifications Conducted for Approved Government Programs may be Substituted for PMHA Income Verifications if Performed Within 90 Days.

Approved by HUD in 2009.

PMHA would use the information gathered and certified to by residents in their eligibility determinations performed for other means-tested programs, if this information was no older than 90 days.

This activity was not implemented after changes in leadership at other agencies changed the willingness to exchange information with the Housing Authority.

This activity was closed out in its entirety in 2014 as a possible reform.

SECTION V: MTW SOURCES AND USES OF FUNDS

Estimated Sources of	MTW Funding for the Fiscal Year	
PHAs shall provide the estimated sources an	d amounts of MTW funding by FDS li	ne item.
	Sources	
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$791,916
70600	HUD PHA Operating Grants	\$12,674,690
70610	Capital Grants	\$320,458
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$243,230
71100+72000	Interest Income	\$8,422
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$314,859
	Total Revenue	\$ 14,353,575

Us	ses	
FDS Line Item	FDS Line Item Name	Dollar Amoun
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$1,829,296
91300+91310+92000	Management Fee Expense	\$243,230
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$87,754
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$302,551
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$708,495
95000 (95100+95200+95300+95500)	Total Protective Services	\$2,720
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$99,104
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$105,698
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$2,282
97100+97200	Total Extraordinary Maintenance	\$16,263
97300+97350	Housing Assistance Payments + HAP Portability-In	\$10,309,188
97400	Depreciation Expense	\$646,440
97500+97600+97700+97800	All Other Expenses	\$0
90000	Total Expenses	\$ 14,353,02

				\	/.2.Plan	.Local A	sset l	Vlana	gemen	t Pla	n						
	B. MTW Plan: Local Asset Management Plan																
Is the P	Is the PHA allocating costs within statute?									or							
	Is the PHA implementing a local asset management plan (LAMP)?									or	No						
If the PHA is proposed and updated if an	l approv	ed. T	he nar	rative	e shall ex	plain th						_	_		•		
Has the	PHA pr	ovide	d a LAI	MP in	the appe	endix?				or	No						
	·					Not	: Appl	icable	9	·							
																	_

SECTION VI: ADMINISTRATIVE

The Board Resolution approving this plan is attached at the end of the document in the Appendix.

PMHA held public meetings to develop and present the 2015 Annual Plan, beginning June 17, 2014 at Etna House, Ravenna. Other meetings were held in other locations in the community: June 24 at Eastowne Manor, Ravenna, July 8 in two locations in Kent, Ohio; July 10 at Town Square Villas in Brimfield; August 27, two locations in Ravenna; September 2, Renaissance Place in Ravenna, and September 3, in Kent. A total of 28 individuals participated in the meetings to develop and review the plan. The final draft of the Plan was made available for public review September 27, 2014, with a public hearing held on October 14, 2014.

Portage Metropolitan Housing Authority collects information for the purposes of evaluating MTW program results, for reporting the annual MTW report to HUD and for planning purposes by using existing PMHA staff. PMHA does not hire any independent or outside evaluators to perform assessments of the activities or the MTW program as a whole.

The Annual Statement/Performance and Evaluation Report (HUD 50075.1) is attached as an Appendix.

ADDITIONAL APPENDIX ITEMS

OMB Control Number: 2577-0216 Expiration Date: 6(31)/2016

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

Certifications of Compliance

Annual Moving to Work Plan 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 Annual Moving to Work Plan*

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) lated below, as its Chairmen or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning \(\frac{1}{1}\frac{1}{15}\) Pereinalter refer ted to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Criban Development (HDD) in connection with the submission of the Plan and innermentation thereof:

- The PIAA published a mattee that a hearing would be held, that the Plan 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 Plan by the Board of Commissioners, and that the PIIA conducted a public hearing to discuss the Plan and invited public comment.
- The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before
 approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual
 MTM Plan.
- The 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.
- The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section SC4 of the Rehabilitation Act of 1973, and title If of the Americans with Disabilities Act of 1990.
- The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- 6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choico, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Pian.
- 7. The PISA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local prisdictions to implement any of the jurisdiction's Initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
- The PHA will comply with the pruhibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFB Part 41, Policies and Procedures for the Enforcement
 of Standards and Requirements for Accessibility by the Physically Handicapped.
- 10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Engloyment Opportunities for Low-or Very-Low Income Persons, and with its Emplementing regulation at 24 CFR Part 135.
- The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- 12. The PHA with comply with requirements with regard to compliance with restrictions on lobosing required by 24 CFR Part 87, tagether 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.

Aziachmient B

CMB Control Number: 2577-0216 Explication Date: 5/3/1/2016

- 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and Implementing regulations at 49 GFR Part 24 as applicable.
- 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- 15. The PHA will growde 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 maintate documentation that verifies compilance with environmental requirements pursuant to 24 Part 58 and 24 OFR Part 50 and will make this documentation available to HUD upon its request.
- 16. 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.
- 17. The PHA will keep records in accordance with 24 CFR 85.20 and familitate an effective applit to determine compliance with program requirements.
- The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 OFR Part 35.
- 19. The PHA will comply with the poficies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Regulternents for Grants and Cooperative Agreements to State, Local and Foderally Recognized Indian Tripal Governments).
- The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made evaluable for public inspection along with the Plan and additional requirements at the primary husiness 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 pusiness office of the PHA.

Portoge metropolitan Housing	OH OB)
PHA Name AUTHORITY	PH/\ Number/HA Code

I hereby certify that as the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute fasse claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 2001, 1010, 1012; 31 U.S.C. 3729, 3802)

Chammerse 11/20/14 THUMAN, J. SIL-US RO Name of Authorized Official

Though Aug

*Must be signed by either the Chairman or Secretary of the Soard 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 Socretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

Attachment B

ADDITIONAL APPENDIX ITEMS

Annual Statement/Performance and Evaluation Report

Annual Statement/Performance and Evaluation Report

Capital Fund Program, Capital Fund Program Replacement Housing Factor and

Capital Fund Financing Program

OMB No. 2577-0226

	Capital Fund Program, Capital Fund Pro	gram Replacement F	lousing Factor and	i i		Offic	e of Public and	Indian Housing	
	Capital Fund Financing Program						OMB No. 2577	7-0226	
							Exp	oires 4/30/2011	
Part I	Summary								
PHA Na		Grant Type and N	umher				FFY of Grant:		
I IIA IIG			m Grant No: OH12P03	1501_1	13		2013		
Dorto	as Matropoliton Housing Authority		III GIUIII NO. GIIIZI G	1001-					
Porta	age Metropolitan Housing Authority	Date of CFFP:				FFY of Gran		proval:	
Type of	f Grant								
П	Original Annual Statement	Reserve for Disaste	ers/Emergencies	X	Revised Annual State	ement (revision no: 2)		
П	Performance and Evaluation Report or Period En	ding:			Final Performance ar	d Evaluation Report			
Line	Summary by Development Account	Total E	ctimat	ted cost	Total Actual Cost				
Lille	Summary by Development Account	Original	Suilla	Revised	Obligated		nded		
1	Total non-CFP Funds		Oligiliai	-	Reviseu	Obligated	Ехре	ilueu	
2	1406 Operations (may not exceed 20% of line 2)	1)	32.2	25.00	32,225.00	0.00		0.00	
3	1408 Management Improvements	<i>'</i>)	,	00.00	3,000.00			965.00	
4	1410 Administration (may not exceed 10% of lin		03.00	34,503.00					
5	1411 Audit	54,5	0.00	0.00					
6	1415 Liquidated Damages		0.00	0.00					
7	1430 Fees and Cost	14,000.00		14,000.00					
8	1440 Site Acquisition	0.00		0.00					
9	1450 Site Improvement			82.092.00			0.0		
10	1460 Dwelling Structures	263,900.00		204,900.00		••••			
11	1465.1 Dwelling Equipment - Nonexpendable	0.00		0.00					
12	1470 Non-dwelling Structures	0.00 0.0		0.00		0.00			
13	1475 Non-dwelling Equipment			0.00	0.00	0.00		0.0	
14	1485 Demolition					0.00		0.00	
15	1492 Moving to Work Demonstration			0.00	0.00			0.0	
16	1495.1 Relocation Costs			0.00	0.00			0.0	
17	1499 Development Activities			0.00	0.00			0.0	
18a	1501 Collateralization or Debt Service paid by the	PHA		0.00	0.00			0.0	
18ba	9000 Collateralization or Debt Service paid Via S		0.00		0.00		0.00		
19	1502 Contingency (may not exceed 8% of line 2	<u> </u>	5,000.00		5,000.00		0.0		
20	Amount of Annual Grant: (sum of lines 2 - 19)	-,	375,720.00			375,720.00 0.00			
21	Amount of line 20 Related to LBP Activities		0.00			0.00 0.00			
22	Amount of line 20 Related to Section 504 Activiti	es	10,000.00		10,000.00 0.00				
23	Amount of line 20 Related to Security - Soft Costs		3,000.00				0.0		
24	Amount of line 20 Related to Security - Hard Costs		0.00		0.00 0.				
25	Amount of line 20 Related to Energy Conservation	76,500.00		76,500.00					
	Signature of Executive Director	Date		Signature of Public Housing Director			Date		
			N						
			November 3, 2014						
1	To be completed for the Performance and	Evaluation Report.							
	To be completed for the Performance and	•	Revised Annual St	ateme	ent				
	PHAs with under 250 units in managemen								
	RHF funds shall be included here.	1110, 036 100 /0 01 01	. Granto foi opera	aono.					
4	TATE TURIOS SHAIL DE HICHUGEU HETE.		Page 1 of 3			£ 11	UD-50075.1 (4/	2000)	

Capital Fund Progra Capital Fund Financ	ing Program	n	lacement no	using r aci	tor and			Office of Public at	IB No. 2577-02	
supitar r and r mano	ing r rogiui								Expires 4/30/20	
Part II: Supporting	Pages									
PHA Name:					r CFFP (Yes/No):	_	Federal FFY of			
			Capital Fund P	rogram Gran	nt No: OH12P031501-	13	2013			
Portage Metropo			Replacement I	Housing Factor Grant No:						
Development Number		scription of Major Work	Development	Quantity Total Estimated Costs		Total Ad	tual Cost	Status of World		
Name/PHA - Wide	Categories		Account No.							
Activities										
					Original	Revised	Funds	Funds		
01104000004 F: 07	_	4 :	4400		00.005.00		Obligated	Expended		
DH31000001 - EAST		perations	1406 1406		22,235.00					
)H31000002 - WEST	0	perations	1406		9,990.00					
	Managem	ent Improvements	-							
OH31000001 - EAST			1408		2,070.00			\$2,135.55		
DH31000001 - EAST			1408		930.00			\$2,135.55		
JH3 1000002 - WEST	Residents	ecunty	1400		930.00					
OH31000001 - EAST	Coordinato	or Drug Elimination	1408		0.00					
DH31000002 - WEST			1408		0.00					
	Adı	ministration								
OH31000001 - EAST	Salaries/Fr	inge Benefits	1410		1,500.00					
DH31000002 - WEST	Salaries/F	ringe Benefits	1410		33,003.00					
OH31000001 - EAST	Advertising	g for Bids	1410							
DH31000002 - WEST			1410							
	Non-dwelling Equipment									
OH31000001 - EAST			1475							
OH31000002 - WEST			1475							
	Fee	s and Costs	1430		14,000.00					
	C	ontingency	1502		5,000.00					
		pleted for the Perfor								
2	To be com	pleted for the Perfor	mance and Ev	valuation R	eport or a Revised	Annual Statem	ent			
3	PHAs with	under 250 units in n	nanagement i	may use 10	00% of CFP Grants	for operations.				
4	RHF funds	shall be included h	ere.							
					Page 2 of 3		form HUD-50079	5.1 (4/2008)		

Annual Statement/Performa	ance and Evaluation Report ital Fund Program Replacement H	loucing Eac	tor and			U.S. Department		Jrban Developme and Indian Housir
Capital Fund Financing Pro		lousing r ac	tor and					MB No. 2577-022
oupital Fund Financing Fro							Expires 4/30/20	
D (II 0 (I D								
Part II: Supporting Page: PHA Name:	S	Crant Tuna	and Number	CFFP (Yes/No):		Federal FFY of 0		
PRA Name:				t No: OH12P03150	1-14	rederairer of	2014	
Portage Metropolitan H	lousing Authority		t Housing Fact					
Development Number	General Description of Major Work	Development Quantity		Total Estimated Costs		Total Actual Cost		Status of Work
Name/PHA - Wide	Categories	Account No.	,					
Activities								
	31000002 - EAST SIDE			Original	Revised	Funds Obligated	Funds Expended	
PHA Wide	Install ADA Bathing System / ADA							
	Commode	1460	as needed	5,000.00				
OH31002P Scattered Sites	31000002 - WEST SIDE							
Renaissance	Pave asphalt parking lot	1450	as needed	66,546.00				
1347 Arcadia Road	Rehab interior and exterior							
	abate / LBP / Asbestos Replace fence concrete work	1460 1450	all all	99,000.00 8,000.00			22,663.50	
				-,				
3701 Duffield Road	Rehab interior and exterior abate Asbestos	1460		95.900.00			22.663.50	
	Repl fence / concrete work	1450		7,546.00			22,003.30	
PHA Wide	Install ADA Bathing System / ADA	1460	as needed	5,000.00				
	Commode							
	To be completed for the Performa	nce and Eva	luation Repo	ort.				
	2 To be completed for the Performa 3 PHAs with under 250 units in mar							
	4 RHF funds shall be included here	_	ay use 100%	on CFP Grants f	or operations	5.		
				Page 3 of 3		form HUD-50075	1 (4/2000)	

ADDITIONAL APPENDIX ITEMS

Resident Commissioner: The City Manager of Kent, Ohio appoints the resident commissioner position. This position is currently occupied by Linda UmBayemake.

Non-Smoking Policies in Public Housing: PMHA has adopted non-smoking policies for its group homes, Walnut House and Washington Group Home, dues to the community living environment both facilities feature for the residents. PMHA has no intention of implementing a non-smoking policy in Public Housing as long as it is not a requirement of law or HUD regulation.

Violence Against Women Act: PMHA is committed to assisting victims of domestic violence. PMHA's Administrative Plan and Admissions and Continued Occupancy Plans are written to protect victims of either gender from unfair evictions and program terminations due to the violence perpetrated against them. PMHA reviews police reports for Public Housing to identify the need to refer residents to counseling and other necessary domestic violence programs. PHMHA will also pursue evictions against residents responsible for domestic violence. For the purposes of discussion here, these activities include victims of all criminal activity covered under the VAWA.

Significant Modification to the Annual Plan: PMHA considers the following actions or activities to be significant amendments or substantial deviations from the Annual Plan approved by the Board of the PMHA and Department of Housing and Urban Development.

- Actions that fundamentally change the PMHA mission statement, goals and objectives
- Actions that fundamentally change PMHA plans or policies in a manner that is inconsistent with the existing mission, goals, or objectives and requiring formal approval of the Board of Commissioner of PMHA.
- Actions that require an MTW waiver approval from the Department of Housing and Urban Development.

PHAS: PMHA chooses not to be evaluated under the Public Housing Assessment System until required to do so by the Department of Housing and Urban Development.