

# Foothills Regional Housing's 2023 Annual Plan and MTW Supplement

Documents are also available at the reception desk at 11941 W  $48^{\text{th}}$  Ave, Wheat Ridge, CO 80033

For questions, please call 303-422-8600



### Streamlined Annual PHA Plan (HCV Only PHAs)

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

OMB No. 2577-0226 Expires 03/31/2024

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

Applicability. The Form HUD-50075-HCV is to be completed annually by HCV-Only PHAs. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are

#### Definitions.

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

	PHA Information.					
1	PHA Name:					
	PHA Consortia: (Check box if submitting a joint Plan and complete table below)  Participating PHAs  PHA Code  Program(s) in the Consortia  Program(s) not in the  No. of Unite in Feeb Program(s)					
	Lead HA:		C (/ = = COMOTHE	Consortia	No. of Units in Each Program	
- 1						
					i -	

1						
В.	Plan Elements.					
ъ.	Tan Liements.					
B.1	Revision of Existing PHA Plan Elements.					
	a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?  Y N					
	□       Statement of Housing Needs and Strategy for Addressing Housing Needs.         □       Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.         □       Financial Resources.         Rent Determination.       Operation and Management.         □       Informal Review and Hearing Procedures.         □       Homeownership Programs.         □       Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.         □       Substantial Deviation.         Significant Amendment/Modification.					
	(b) If the PHA answered yes for any element, describe the revisions for each element(s): MTW Supplement and Administrative Plan updates					
B.2	New Activities. – MTW Supplement and Administrative Plan updates for MTW activities					

#### B.3 Progress Report.

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

- Add to the affordable housing inventory in Jefferson County: JCHA completed the re-development of Allison Village apartments located in Arvada; this re-imagined community offers 100 LIHTC units consisting of 1 & 2-bedroom units compared to the 37 units the community was initially constructed with. We have partnered with the Veterans Affairs and CASA of Jefferson and Gilpin County to provide their referrals of homeless vets and youth aging out of foster care housing. The community will have 39 total PBV units, of which 30 will be dedicated to youth aging out of the foster care system and 9 of which will be set aside for vets. Purchased a newly constructed property in Wheat Ridge, CO called Vance Street Flats. It is a 24-unit building with one and two-bedroom units. 12 of those units will be PBVs for the City of Wheat Ridge's Homeless Navigation Team.
- Preserve and improve existing affordable housing in Jefferson County: renovated a 108-unit community that has been transformed into a 100% LIHTC community layered with CDBG and will have 8 PBVs. Transferred a multifamily 50059 contract to a senior property in Westminster.
- Expand and improve the Single-Family Emergency Home Repair Program: Our team has eliminated loans and is only issuing grants to homeowners in Jefferson County, allowing families to complete repairs in their homes without incurring interest. 4.
- Expand JCHA's voucher program: continuing to add new FYIs and PBV units in Jefferson County
- Complete HCV Administrative Plan updates and edits to accommodate the MTW Supplement
- Proposed MTW activities submitted in MTW Supplement with Administrative Plan updates:

#	Description	Achieve cost efficiencie s	Support self- sufficiency	Increase housing options
2023-1	Payment Standards – Fair Market Rents		- Julio Citoy	X
2023-2	Self-certification of assets	X	X	^
2023-3	HCV Leasing Initiative	^	^	
2023-4	Waiver of Mandatory Initial Inspection	X		Х
2023-5	Pre-Qualifying Unit Inspections	^		Х
2023-6	Alternative Inspection Schedule	· x		Х
2023-7	Increase PBV Program Cap	۸		Х
2023-8	Increase PBV Project Cap			Х
2023-9	Elimination of PBV Selection Process for PHA- owned Projects without Improvement, Development, or Replacement	X		x x
2023-10	Alternative PBV Selection Process			1000
2023-11	Increase PBV HAP Contract Length			X
2023-12	Increase PBV Rent to Owner			Х
2023-13	Service Provision (local, non-traditional)		V	Х
2023-14	Housing Development Programs (local, non-traditional)		X	x

<b> </b>						
B.4	Capital Improvements Not Applicable					
B.5	Most Recent Fiscal Year Audit.					
	(a) Were there any findings in the most recent FY Audit?					
	Y N N/A					
	(b) If yes, please describe:					
C.	Other Document and/or Certification Requirements.					
C.1	Resident Advisory Board (RAB) Comments.					
	(a) Did the RAB(s) have comments to the PHA Plan?					
	Y N					
	(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. See attachments					
C.2	Certification by State or Local Officials.					
	Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.					
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.					
	Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.					
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.  (a) Did the public challenge any elements of the Plan?  Y N					
	If yes, include Challenged Elements.					
D.	Affirmatively Furthering Fair Housing (AFFH).					
D.1	Affirmatively Furthering Fair Housing (AFFH).					
	Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this further detail on completing this item.					
	Fair Housing Goal: Not applicable					

Fair Housing Goal:		
	tegies and actions to achieve the goal Not applic	aabla
	The second to demeve the gout Not application	capie
Fair Housing Goal:		
Describe fair housing stra	tegies and actions to achieve the goal Not applic	cable
	and the state of t	
	tion of Form HUD-50075-HCV	

- PHA Information. All PHAs must complete this section. (24 CFR §903.4)
  - A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), Number of Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

Plan Elements. All PHAs must complete this section. (24 CFR §903.11(c)(3))

	B.1	Revision of Existing PHA Plan Elements. PHAs must:
		Identify specifically which plan elements listed below that
		Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes"
		LJ Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very the jurisdiction served by the PHA and other families who are on the Section 8 tenant-based assistance waiting lists. The statement must identify the individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, needs in accordance with 24 CFR \$ .154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, needs in accordance with 24 CFR \$ .154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic Housing Needs. (24 CFR § 903.7(a)).
		The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))
		L) Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. (24 CFP) sees a graph of the PHA's policies that govern resident
	] 2	HIGH PHARICIAL RESOURCES. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))
	l	LI Rent Determination. A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance,
	[ b	Operation and Management. A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (24 CFR §903.7(e)).
	L a	Informal Review and Hearing Procedures. A description of the informal hearing and review procedures that the PHA makes available to its
	a	Homeownership Programs. A statement describing any homeownership programs (including project number and unit count) administered by the
	p P or or	Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the referred as a result of the PHA's partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act and actual size of the FSS program) and means of allocating assistance to households. (24 CFR §903.7(1)(ii)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. (24
		Substantial Deviation. PHA must provide its criteria for determining.
	L A:	Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))  Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and named Plan.
	If	any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.
B.2	Ne	ew Activities. This section refers to new capital activities which is not applicable for HCV-Only PHAs.
B.3	me	rogress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in
B.4	Ca <sub>j</sub>	pital Improvements. This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only
B.5	Me fin	ost Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those dings in the space provided. (24 CFR §903.7(p))
Othe	r Do	ocument and/or Certification Requirements.
	Re	sident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the an and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
		Page 6 of 7

- C.2 Certification by State of Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed. Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(0)).
- C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

### , D. Affirmatively Furthering Fair Housing (AFFH).

each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) .... Strategies and actions must affirmatively further fair housing ...." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public for serving the needs of low-income, very low-income, and extremely low-income families.

Public reporting burden for this information collection is estimated to average 6.02 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

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

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

### PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_5-Year and/or Annual PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 123, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).

The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).

The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.

The PHA provides assurance as part of this certification that:

(i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;

(ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and

(iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during

5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.

The PHA certifies that it will carry out the public housing program of the agency 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), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.

The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

8. For PHA Plans that include a policy for site-based waiting lists:

The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing: and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
- 9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act
- 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the 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.
- 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- 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 CFR 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 provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
- 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 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
- 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35
- The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
- 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Jefferson County Housing Auth	PHA)Number/HA Code
Annual PHA Plan for Fiscal Year 20 23 (250	
5-Year PHA Plan for Fiscal Years 20 20	
I hereby certify that all the information stated herein, as well as any information pro- prosecute false claims and statements. Conviction may result in criminal and/or civil	vided in the accompaniment herewith, is true and accurate. Warning: HUD will penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).
Name of Exemptive Direction  Older Justin Date  Date	Name Board Chairman  Signature Date

Page 2 of 3

form HUD-50077-ST-HCV-HP (3/31/2024)

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

### U. S Department of Housing and Urban Development

Office of Public and Indian Housing OMB No. 2577-0226 Expires 3/31/2024

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

I, Emily Sander , the, the,	Community Development Manager
	Official's Title
certify that the 5-Year PHA Plan for fiscal y year 2023 of the Selection Country doa Forthills Regional Consolidated Plan or State Consolidated Plan in Housing Choice or Assessment of Fair Housing	Jame
Jefferson County	
Local Juri	sdiction Name
pursuant to 24 CFR Part 91 and 24 CFR § 903.	15.
	ntents are consistent with the Consolidated Plan or
Access to, and development an	d rehabilitation of affordable housing
for Jefferson County residents.	and to a field string
I hereby certify that all the information stated herein, as well as any information prosecute false claims and statements. Conviction may result in criminal and/or civ	ovided in the accompaniment herewith, is true and accurate. Warning: HUD will il penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)
Name of Authorized Official:	
Emily Sander	Community Development Manager
Signature: Emily Sander	Date: 10/05/2023
The United States Department of Housing and Urban Development is authorize Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12 are required to observe a	ed to solicit the information requested in this form by virtue of Title 17, U.S.

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

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

Page 1 of 1

form HUD-50077-SL (3/31/2024)

## Foothills Regional Housing Moving to Work Plan and Supplement

### **Contents**

Contentsi
What is Moving to Work?
FRH and Moving to Work
MTW Activities to be Implemented in the Coming Year2
Activity 2023-1: Payment Standards – Fair Market Rents
Activity 2023-2: Self-certification of assets
Activity 2023-3: HCV Leasing Initiative5
Activity 2023-4: Waiver of Mandatory Initial Inspection
Activity 2023-5: Pre-Qualifying Unit Inspections
Activity 2023-6: Alternative Inspection Schedule
Activity 2023-7: Increase PBV Program Cap9
Activity 2023-8: Increase PBV Project Cap
Activity 2023-9: Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement
Activity 2023-10: Alternative PBV Selection Process
Activity 2023-11: Increase PBV HAP Contract Length
Activity 2023-12: Increase PBV Rent to Owner
Activity 2023-13: Service Provision (local, non-traditional)
Activity 2023-14: Housing Development Programs (local, non-traditional)

## Foothills Regional Housing Moving to Work Plan and Supplement 2023

### What is Moving to Work?

As the population of the greater Denver area and Jefferson County has grown, affordable housing is becoming more difficult to obtain for working families, seniors and people experiencing disabilities, and other low-income individuals and households. The rental market in Jefferson County continues to tighten and median rents have risen 59% since 2010<sup>1</sup>. Many working people face high housing cost burdens or long commutes to work. At the same time, many seniors who want to age in place cannot afford to rent in their current neighborhood.

Foothills Regional Housing (FRH) joined the Moving to Work (MTW) demonstration program in 2022 under the 'landlord incentive' cohort to help the agency address the affordable housing challenges in Jefferson County. Through its participation in Moving to Work, FRH seeks to increase housing choice and promote self-sufficiency for its Housing Choice Voucher (HCV) families living in Jefferson County.

The Moving to Work demonstration provides participating public housing authorities, like FRH, with two key flexibilities to meet local housing needs. First, agencies may combine various federal funding streams into a single, flexible account. Second, agencies may implement policies that modify the 1937 Housing Act and subsequent amendments. These policies—known as MTW 'activities'—must fulfill at least one of MTW's statutory objectives, which include:

- Reduce costs and achieve greater cost-effectiveness in federal expenditures.
- Give incentives to families with children to obtain employment and become economically self-sufficient.
- Increase housing choices for low-income families.

Importantly, agencies that are participating in MTW do not receive any additional federal funding. As a result of that, they must constantly balance any activities that either increase expenditures or reduce revenues with other activities that decrease expenditures or increase revenues.

#### FRH and Moving to Work

Through its participation in Moving to Work, FRH will seek to address the barriers that its Housing Choice Voucher (HCV, commonly known as 'Section 8') families face in accessing affordable housing. In particular, FRH will seek to expand the number of housing options available to HCV families in 'high opportunity neighborhoods' with low crime, good schools, and access to jobs. Providing residents with more housing choices will increase self-sufficiency for HCV families by allowing them to live closer to well-paying jobs that can help them provide for their families and build wealth. FRH will also seek to

<sup>&</sup>lt;sup>1</sup> American Community Survey (1 year) Median Gross Rent, 2019, 2010.

implement Moving to Work activities that allow it to deliver services in more cost-effective ways, which will allow FRH to fund its landlord incentives.

In addition to the MTW statutory objectives, FRH's goals for Moving to Work participation include:

- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- Reduce voucher holders' search times for housing
- Deliver services in more cost-effective ways
- Help families with children become economically self-sufficient

### MTW Activities to be Implemented in the Coming Year

This document describes the MTW activities that FRH will seek to implement in the coming year (2023). FRH will continue to implement these activities in future years unless it eliminates or modifies them in a future MTW plan or an MTW plan addendum. In subsequent years, FRH may seek to implement additional activities that will further address the goals of its MTW participation as outlined above.

We have summarized the MTW activities that FRH intends to implement in the table below. As you can see, most of these activities concern the MTW statutory objective of increasing housing options for low-income families. Relatively fewer activities seek to address the other two MTW statutory objectives.

Exhibit 1: Proposed MTW activities

#	Description	Achieve cost efficiencies	Support self- sufficiency	Increase housing options
2023-1	Payment Standards – Fair Market Rents		- January	Х
2023-2	Self-certification of assets	X	X	
2023-3	HCV Leasing Initiative			Χ
2023-4	Waiver of Mandatory Initial Inspection	X		X
2023-5	Pre-Qualifying Unit Inspections			X
2023-6	Alternative Inspection Schedule	X		X
2023-7	Increase PBV Program Cap			X
2023-8	Increase PBV Project Cap			X
2023-9	Elimination of PBV Selection Process for PHA- owned Projects without Improvement, Development, or Replacement	х		X
2023-10	Alternative PBV Selection Process			X
2023-11	Increase PBV HAP Contract Length			X
2023-12	Increase PBV Rent to Owner			X
2023-13	Service Provision (local, non-traditional)		Χ	X
2023-14	Housing Development Programs (local, non-traditional)			Х

### Activity 2023-1: Payment Standards - Fair Market Rents

**Description of Activity:** FRH will increase its payment standards to 120% of Fair Market Rents (FMR). The agency will continue to use its rent reasonableness process to determine rent to owner for individual units.

This activity contributes to FRH's Moving to Work goals to:

- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- Reduce voucher holders' search times

This activity is labeled as 2.b in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor wavier for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve? Increasing housing options for low-income families
- What are the cost implications of this MTW activity? It increases expenditures
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet$   $\;$  Please select the family types subject to this MTW activity:  $\,N/A\,$
- ullet Does the MTW activity apply to all public housing developments? N/A
- $\bullet \quad \text{Which developments participate in the MTW activity? } N/A$
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } \text{N/A}$
- Does the MTW activity require a hardship policy? Yes
- ullet Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
- Does the MTW activity require an impact analysis? Yes

### Activity 2023-2: Self-certification of assets

**Description of Activity:** At re-examination, FRH will allow clients to self-certify assets up to \$50,000. This activity will minimize staff burden during reexaminations while also encouraging FRH clients to accumulate assets without worrying that they will increase their rent.

This activity contributes to FRH's Moving to Work goals to:

- Deliver services in more cost-effective ways
- Help families with children become economically self-sufficient

This activity is labeled as 3.d in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor wavier for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve? Reduce cost and achieve greater cost effectiveness in federal expenditures; Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient
- What are the cost implications of this MTW activity? Cost-neutral
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet \quad \hbox{Please select the family types subject to this MTW activity: } N/A \\$
- ullet Does the MTW activity apply to all public housing developments? N/A
- ullet Which developments participate in the MTW activity? N/A
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } \ N/A$
- Does the MTW activity require a hardship policy? No
- ullet Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
- ullet Does the MTW activity require an impact analysis? No

### Activity 2023-3: HCV Leasing Initiative

**Description of Activity:** FRH will establish a policy to reimburse landlords for tenant damages following move out. The maximum amount of claims that a landlord may request is limited to two months of contract rent and the landlord must have exhausted the tenants' security deposit before they can request funds from FRH. Landlords must submit proof of damages and their expenses and that these expenses exceed the amount of the security deposit. The payment will be made when the next HAP contract is executed between the owner and FRH.

In addition, FRH will establish other incentives to encourage landlords to participate in the HCV program. These may include a sign-up bonus for landlords who have not previously rented to an FRH voucher holder for a certain number of years as well as a continuation bonus for landlords who renew the lease of a voucher holder.

This activity contributes to FRH's Moving to Work goals to:

- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- Reduce voucher holders' search times

This activity is labeled as 4.b and 4.c in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve: Increasing housing options for low-income families
- What are the cost implications of this MTW activity? Increase expenditures
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households: Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet \quad \hbox{Please select the family types subject to this MTW activity: } N/A \\$
- $\bullet$   $\;$  Does the MTW activity apply to all public housing developments?  $\;N/A\;$
- ullet Which developments participate in the MTW activity? N/A
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } \ N/A$
- ullet Does the MTW activity require a hardship policy?  $N_0$
- ullet Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
- ullet Does the MTW activity require an impact analysis?  $_{No}$

### Activity 2023-4: Waiver of Mandatory Initial Inspection

**Description of Activity:** FRH will waive the requirement for an initial inspection for units that meet any of the following criteria:

- The unit is less than five years old (as determined by the certificate of occupancy)
- The unit passed an HQS inspection within the previous three years

Even when an initial inspection is waived under this activity, the voucher participant or landlord may request an interim inspection at any time. Following the waived initial inspection, the unit will then be inspected on FRH's Alternative Inspection Schedule (see Activity 2023-6 for details).

This activity contributes to FRH's Moving to Work goals to:

- Deliver services in more cost-effective ways
- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- Reduce voucher holders' search times

This activity is labeled as 4.1 in the Request for Applications to the Landlord Incentive Cohort document and is a cohort-specific waiver. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve: Reduce cost and achieve greater cost effectiveness in federal expenditures; Increasing housing options for low-income families
- What are the cost implications of this MTW activity? Decrease expenditures
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households: Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet \quad \hbox{Please select the family types subject to this MTW activity: } N/A \\$
- ullet Does the MTW activity apply to all public housing developments? N/A
- ullet Which developments participate in the MTW activity? N/A
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } \ N/A$
- $\bullet$   $\;$  Does the MTW activity require a hardship policy?  $\;No\;$
- $\bullet$  Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?  $\,\mathrm{No}$
- Does the MTW activity require an impact analysis? No

### Activity 2023-5: Pre-Qualifying Unit Inspections

**Description of Activity:** When requested by the property owner or manager, FRH may conduct a prequalifying unit inspection up to 90 days prior to the voucher participant occupying a unit. This prequalifying inspection will streamline the lease-up process for voucher participants, as the inspection will have already been conducted prior to the RFTA being completed. It will also encourage more landlords to participate in the voucher program as it will reduce the lease-up time for voucher holders, thus allowing landlords to receive their first HAP payment earlier.

This activity contributes to FRH's Moving to Work goals to:

- Deliver services in more cost-effective ways
- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- Reduce voucher holders' search times

This activity is labeled as 5.a in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve: Reduce cost and achieve greater cost effectiveness in federal expenditures; Increasing housing options for low-income families
- What are the cost implications of this MTW activity? Cost neutral
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households: Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet\quad$  Please select the family types subject to this MTW activity: N/A
- $\bullet$   $\;$  Does the MTW activity apply to all public housing developments?  $\;N/A\;$
- $\bullet \quad \text{Which developments participate in the MTW activity? } N/A$
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } \ N/A$
- $\bullet\ \ \$  Does the MTW activity require a hardship policy?  $N_0$
- ullet Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
- $\bullet\ \ \$  Does the MTW activity require an impact analysis? No

### Activity 2023-6: Alternative Inspection Schedule

**Description of Activity:** FRH will establish a policy to reduce the frequency with which it conducts Housing Quality Standards (HQS) inspections to once every three years following the initial inspection. Voucher participants may still request an interim inspection when they believe the unit is not meeting HUD housing quality standards between the regularly scheduled 3-year inspections.

This activity contributes to FRH's Moving to Work goals to:

- Deliver services in more cost-effective ways
- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- Reduce voucher holders' search times

This activity is labeled as 5.d in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve: Reduce cost and achieve greater cost effectiveness in federal expenditures; Increasing housing options for low-income families
- What are the cost implications of this MTW activity? Decrease expenditures
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households: Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet \quad \hbox{Please select the family types subject to this MTW activity: } N/A \\$
- $\bullet$  Does the MTW activity apply to all public housing developments?  $\,N/A\,$
- ullet Which developments participate in the MTW activity? N/A
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } N/A \\$
- Does the MTW activity require a hardship policy? No
- ullet Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
- $\bullet\ \ \$  Does the MTW activity require an impact analysis? No

### Activity 2023-7: Increase PBV Program Cap

**Description of Activity:** FRH intends to increase its project-based voucher (PBV) cap to 50 percent of its total authorized voucher units or annual voucher budget authority, whichever is lower. By project-basing more vouchers, FRH can strategically locate PBV units in high-opportunity neighborhoods in Jefferson County. PBV units can also help to reduce voucher holders' search times by providing more units in Jefferson County that rent to voucher holders.

This activity contributes to FRH's Moving to Work goals to:

- Increase the number of units available to voucher holders in Jefferson County
- Increase the number of units available to voucher holders in high-opportunity neighborhoods
- Reduce voucher holders' search times

This activity is labeled as 9.a in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve: Increasing housing options for low-income families
- What are the cost implications of this MTW activity? Cost-neutral
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households: Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet \quad \hbox{Please select the family types subject to this MTW activity: } N/A \\$
- $\bullet$   $\;$  Does the MTW activity apply to all public housing developments?  $\;N/A\;$
- $\bullet \quad \text{Which developments participate in the MTW activity? } N/A$
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } \ N/A$
- Does the MTW activity require a hardship policy? No
- ullet Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
- ullet Does the MTW activity require an impact analysis? No

### Activity 2023-8: Increase PBV Project Cap

**Description of Activity:** FRH intends to increase the allowable project-based voucher cap within a project up to 100% of units. This activity will allow FRH to strategically locate PBVs in projects in high-opportunity neighborhoods in Jefferson County. This activity will complement Activity 9.a above by increasing the availability of units available to FRH voucher holders, thus decreasing average search times for housing.

This activity contributes to FRH's Moving to Work goals to:

 Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods

This activity is labeled as 9.b in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve: Increasing housing options for low-income families
- What are the cost implications of this MTW activity? Cost-neutral
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households: Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet \quad \hbox{Please select the family types subject to this MTW activity: } N/A \\$
- $\bullet$   $\;$  Does the MTW activity apply to all public housing developments?  $\;N/A\;$
- $\bullet \quad \text{Which developments participate in the MTW activity? } \ N/A$
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } \ N/A$
- ullet Does the MTW activity require a hardship policy? No
- ullet Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
- $\bullet$   $\;$  Does the MTW activity require an impact analysis?  $\;No\;$

Activity 2023-9: Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement

**Description of Activity:** FRH will eliminate the selection process in the award of project-based vouchers (PBVs) to properties owned by FRH.

This activity contributes to FRH's Moving to Work goals to:

 Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods

This activity is labeled as 9.c in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve: Increasing housing options for low-income families
- What are the cost implications of this MTW activity? Reduce expenditures
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households: Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet \quad \hbox{Please select the family types subject to this MTW activity: } N/A \\$
- $\bullet$   $\;$  Does the MTW activity apply to all public housing developments?  $\;N/A\;$
- ullet Which developments participate in the MTW activity? N/A
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } \ N/A$
- ullet Does the MTW activity require a hardship policy?  $_{
  m No}$
- ullet Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
- $\bullet\ \ \$  Does the MTW activity require an impact analysis? No

### Activity 2023-10: Alternative PBV Selection Process

**Description of Activity:** FRH will establish an alternative competitive process in the award of project-based vouchers (PBVs) for properties that are owned by non-profit or for-profit housing entities.

This activity contributes to FRH's Moving to Work goals to:

• Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods

This activity is labeled as 9.d in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve: Increasing housing options for low-income families
- What are the cost implications of this MTW activity? Cost-neutral
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households: Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet\quad$  Please select the family types subject to this MTW activity: N/A
- $\bullet$   $\;$  Does the MTW activity apply to all public housing developments?  $\;N/A\;$
- $\bullet \quad \hbox{Which developments participate in the MTW activity? } N/A$
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } \ N/A$
- Does the MTW activity require a hardship policy? No
- $\bullet$   $\;$  Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?  $\;No\;$
- Does the MTW activity require an impact analysis? No

### Activity 2023-11: Increase PBV HAP Contract Length

**Description of Activity:** FRH may, at its discretion, increase the term length of PBV contracts up to 50 years. In particular, FRH will seek to extend the terms of PBV contracts for those units in high-opportunity neighborhoods in Jefferson County. Extending the term length of the PBV contract will ensure that voucher holders in Jefferson County have access to units in high-opportunity neighborhoods for decades to come.

This activity contributes to FRH's Moving to Work goals to:

• Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods

This activity is labeled as 9.f in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve: Increasing housing options for low-income families
- What are the cost implications of this MTW activity? Cost-neutral
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households: Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet \quad \hbox{Please select the family types subject to this MTW activity: } N/A \\$
- $\bullet$  Does the MTW activity apply to all public housing developments?  $\,N/A\,$
- $\bullet \quad \text{Which developments participate in the MTW activity? } \ N/A$
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } N/A \\$
- ullet Does the MTW activity require a hardship policy?  $N_0$
- ullet Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?  ${
  m No}$
- $\bullet\ \ \$  Does the MTW activity require an impact analysis? No

### Activity 2023-12: Increase PBV Rent to Owner

**Description of Activity:** FRH will use its rent reasonableness policy to determine the initial and re-determined rent to the owner for PBV units. This is the same process that FRH uses to determine rent reasonableness for private-market landlords who rent to tenant-based voucher holders. FRH will cap PBV rent to owner at 120% of Fair Market Rent (FMR). Under this activity, FRH will not reduce the rent paid to a PBV owner, thus eliminating the potential for any undue hardships on FRH clients.

This activity contributes to FRH's Moving to Work goals to:

• Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods

This activity is labeled as 9.g in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve: Increasing housing options for low-income families
- What are the cost implications of this MTW activity? Increase expenditures
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households: Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet\quad$  Please select the family types subject to this MTW activity: N/A
- $\bullet$   $\;$  Does the MTW activity apply to all public housing developments?  $\;N/A\;$
- $\bullet \quad \text{Which developments participate in the MTW activity? } N/A$
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } \ N/A$
- Does the MTW activity require a hardship policy? Yes
- $\bullet$   $\;$  Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?  $\;\mathrm{No}$
- Does the MTW activity require an impact analysis? Yes

Activity 2023-13: Service Provision (local, non-traditional)

**Description of Activity:** FRH will use its MTW fiscal fungibility to develop new and innovative supportive services for its HCV program participants.

This activity contributes to FRH's Moving to Work goals to:

Help families with children become economically self-sufficient

This activity is labeled as 17.b in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve: Help families with children become economically self-sufficient
- What are the cost implications of this MTW activity? Increase expenditures
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households: Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet \quad \hbox{Please select the family types subject to this MTW activity: } N/A \\$
- $\bullet \quad$  Does the MTW activity apply to all public housing developments?  $\,N/A\,$
- ullet Which developments participate in the MTW activity? N/A
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } \ N/A$
- ullet Does the MTW activity require a hardship policy? No
- ullet Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
- $\bullet$   $\;$  Does the MTW activity require an impact analysis?  $\;No\;$

Activity 2023-14: Housing Development Programs (local, non-traditional)

**Description of Activity:** FRH will use its MTW fiscal fungibility to acquire, renovate, and/or build affordable units for low-income families that are not public housing units.

This activity contributes to FRH's Moving to Work goals to:

• Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods

This activity is labeled as 17c in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

- Which of the MTW Statutory Objectives does this MTW activity serve: Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- What are the cost implications of this MTW activity? Increase expenditures
- Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households: Applies to all households
- Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? Both 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
- $\bullet$   $\;$  Please select the family types subject to this MTW activity:  $\,N/A\,$
- $\bullet$  Does the MTW activity apply to all public housing developments?  $\,N/A\,$
- $\bullet$   $\;$  Which developments participate in the MTW activity?  $\;N/A\;$
- $\bullet \quad \text{Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. } \ N/A$
- Does the MTW activity require a hardship policy? No
- $\bullet$  Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?  $\,No$
- $\bullet\ \ \$  Does the MTW activity require an impact analysis? No