



ORLANDO HOUSING AUTHORITY

April 19, 2013

Ivan M. Pour, Program Director
Moving to Work Demonstration
U.S. Department of Housing and Urban Development
451 7th Street S.W., Room 4120
Washington, DC 20410

RE: Submission of an Amended Orlando Housing Authority's Annual Moving to Work (MTW) Plan for Year 3 -April 1, 2013 to March 31, 2014

Dear Mr. Pour:

The Orlando Housing Authority (OHA) is pleased to submit an amended Annual Moving to Work (MTW) Plan for Year 3: April 1, 2013 through March 31, 2014. This Amended Plan reflects OHA's response to HUD's Comments, Questions and Required Clarifications, which were received by OHA on March 2013.

We look forward to your approval to proceed with the implementation of our proposed Year 3 MTW Plan. If you have any questions regarding our submission, contact me (407) 895-3300, ext. 1000.

Sincerely,

Vivian Bryant, Esq.
President/CEO

Enclosures

c.c. Victoria Main
Laurel Davis



**HUD COMMENTS, QUESTIONS AND REQUIRED CLARIFICATIONS:
ORLANDO FY14 ANNUAL MTW PLAN – MARCH 28, 2013**

- Pages** **General Comments:**
1. OHA should provide future MTW Plan and Report submissions as converted PDF files, not scanned files.

 2. In future submissions, OHA should include a table of contents with sequential page numbering throughout the document, as opposed to only referencing the reader to labeled sections.

Full Document OHA Response to General Comments
The requested format changes are incorporated in our revised Plan and will become standard for all future OHA MTW Plans and MTW Annual Reports.

Section I. Introduction

Page 1 **HUD Comment 3**
OHA should clarify in the first paragraph of Section I-B that the MTW Plan was effective on January 7th, not January 1st.

OHA Response to 3
OHA will revise any references to the Initial 15-Month Demonstration Period in Section I-B and throughout the remainder of the MTW Plan to read January 7, 2011 through March 31, 2012.

Page 4 **HUD Comment 4**
Language at the bottom on page 4 stating that the new PHA regulation was effective September 10, 2012 and that OHA must now be scored under that rule to be considered a high performed is incorrect. A new PHAS Interim Rule is in effect at this time, but a Final Rule has not been adopted. OHA will not need to be scored under the new PHAS (or under an alternate PHAS applicable to all MTW agencies) until a Final Rule is in place. Please correct this text.

OHA Response to Comment 4
OHA removed that language that stated that it would have to comply with the new PHAS regulations effective September 10, 2012.

Page 4 **HUD Comment 5**
After discussions between OHA and HUD in February of 2013 regarding the continued applicability of REAC PASS inspections, OHA expressed a desire to make modifications of the scope of Activity 4. If

OHA still intends to make such changes, please do so in the revised Plan submission.

OHA Response to Comment 5

OHA will continue to use UPCS inspections standards for public housing units and HQS standards for its housing voucher program.

Section II. General Housing Authority Operating Information

Page 10

HUD Comment 6

While OHA notes it does not plan any capital fund expenditures in excess of 30% of the capital budget, it would be helpful if OHA provided some information on its planned capital activities for FY14.

OHA Response to Comment 6

OHA will use its capital funds to make site improvements (parking lots); improve dwelling structures (Ivey Lane Homes); and for the purchase of non-dwelling equipment (Van- required to comply with fair housing standards)

Page 10

HUD Comment 7

OHA has included its 100 FUP vouchers in its MTW voucher count. These vouchers are funded through separate appropriations and based on the terms of a NOFA, thus they are not eligible for inclusion as MTW vouchers. Recent FUP NOFAs have allowed for the application of MTW flexibilities to the FUP vouchers as long as the flexibilities do not conflict with the provisions of the FUP NOFA, but not for inclusion in the block grant.

OHA Response to Comment 7

OHA had deducted its 100 FUP vouchers from the number of MTW Housing Choice Voucher units authorized.

Page 10

HUD Comment 8

OHA should ensure its number of MTW vouchers authorized is consistent with OHA's recent decision regarding the inclusion/exclusion of the Sanford vouchers from the MTW voucher funding calculation under Attachment A to the MTW Agreement. If OHA has excluded the Sanford HVC funding from its MTW voucher funding calculation for FY14, then those vouchers should be reported as non-MTW HCVs authorized, and their project leasing reflected in the leasing information for non-MTW vouchers.

OHA Response to Comment 8

OHA has deducted the 534 Sanford vouchers from its MTW Housing Choice Voucher unit authorized.

Page 10

HUD Comment 9

OHA states that it will project-base 65 units in FY14, 45 of which will be in accordance with MTW Activity 7. In the bolded sentence, OHA states that the activity was included in the MTW Agreement, Attachment C, paragraph 7.a. The activity was not included in the MTW Agreement, but instead, the activity draws on waivers from authorization D. 7.a of Attachment C. Please correct this statement.

OHA Response to Comment 9

OHA has changed the authorization from Attachment C, Paragraph 7.a. of the MTW Agreement to waives authorized in Attachment C, Paragraph D. 7.a of the MTW Agreement.

Page 11

HUD Comment 10

Based upon the total number of MTW Vouchers OHA plans to lease in FY14 and the total number authorized, it appears OHA will only achieve a 77% leasing rate for FY14. OHA should provide an explanation as to why it plans this low leasing level.

OHA Response to Comment 10

OHA has revised the number of MTW Housing Choice Vouchers units authorized to 2303 and the Anticipated total number of MTW HVC units to be leased in FY14 to 2149. The new projected leasing rate is 93%.

Page 11

HUD Comment 11

OHA states that data for its planned FY14 MTW Voucher and non-MTW Voucher leasing goals is derived from VMS (or Elite) as of 11/01/2012. Existing data could be used as a foundation for future projections but should not be the sole source. Please ensure that leasing projections are not only taking into account current leasing data but also planned activities of the coming fiscal year.

OHA Response to Comment 11

OHA has reviewed its leasing data and has taken into account the planned MTW activities for FY14. Given the current environment of sequestration resulting in reduced budgets for the agency; OHA has no plans to change its leasing projections.

Page 13

HUD Comment 12

In Section II-C, OHA should also discuss how it is managing the waiting list(s) for SHA vouchers becoming a part of the OHA portfolio.

Will a separate SHA waiting list be used? Will these vouchers eventually be filled from OHA's waiting list? Please explain how this will be handled. (HUD asked this same question in regards to OHA's FY12 Report, so the response provided in the revised Report can be the same response provided here, for consistency.

OHA Response to Comment 12

The OHA assumed management control of the Sanford Housing Authority (SHA) in August 2010. The SHA waiting list is closed.

Page 13

HUD Comment 13

Based on the information OHA provides regarding the demographic characteristics of its waiting list families (see page 13 of the Plan), it appears OHA has families on its waiting list that are not low-income (i.e. have incomes above 80% of AMI). If so, these families would not be eligible for public housing or HVC assistance. Please explain.

OHA Response to Comment 13

OHA provides services only to families whose incomes are at 80% or below AMI at the time they are interviewed and certified for housing assistance. In order to avoid confusion, OHA has eliminated the category "Above Low Income" from the income levels on the chart on page 13.

Page 14

HUD Comment 14

OHA cites 3 site-based waiting lists but does not note the status of those lists. Are they open or closed? How many households are on those lists currently? Are any changes planned to those lists during the fiscal year?

OHA Response to Comment 14

OHA has amended the information on its 3 site-based waiting lists as follows:

- *The Villas at Hampton Park* – 48 units for seniors only. There are 780 names on the waiting list. The waiting list is closed.
- *The Villas at Carver Park* – 64 units of public housing and tax credit units. There are 843 names on the waiting list. The waiting list is closed.
- *The Landings at Carver Park* – 30 public housing and tax credit units. There are 1116 names on the waiting list. The waiting list is closed.

No changes are planned for these sites during the fiscal year.

Section III: Non-MTW Related Information

Page 15

HUD Comment 15

In Section III-B., OHA references Antioch manor as a “Section 202/8 development”. Does OHA mean a Section 202/811 development’?

OHA Response to Comment 15

Yes, Antioch Manor is a 202/811 development. OHA has corrected the error in the Plan.

Section IV: Long Term MTW Plan

Page 18

HUD Comment 16

At the top of page 18, OHA states that it will implement a number of other administrative efficiency related activities in the future years. One cited example is procurement. The MTW Agreement does not provide flexibility related to procurement, as procurement rules relate back to other statutes outside of the 1973 Act. Thus, OHA should remove this reference to procurement.

OHA Response to Comment 16

OHA has removed “ procurement” from the list of cost effective strategies in the Plan.

Page 19

HUD Comment 17

On page 19, the second and third paragraphs are duplicative to one another. Please remove duplicative text. Further, any future activities, for which approval will be requested at a later date, should be discussed in Section IV, not Section V.

OHA Response to Comment 17

OHA removed the duplicative text and moved the discussion of future activities to Section V.

Pages 20

HUD Comment 18

On page 20, OHA discusses in detail two activities that it intends to pursue in FY15. Given OHA is not proposing these activities for HUD approval at this time, OHA should remove the additional information that would be required for a proposed activity, and simply provide a description of what it intends to pursue in future years.

OHA Response to Comment 18

OHA removed the additional language this is required for a new proposed activity and simply described what it intends to pursue in future years.

Section V: Proposed MTW Activities

Page 24-25 **HUD Comment 19**

OHA discusses two ideas for future activities that it states it may propose as amendments to its FY14 Plan. Given OHA is not actually proposing these activities at this time, the discussion of these potential activities should be removed to Section IV: Long Term MTW Plan.

OHA Response to Comment 19

OHA moved the discussion of two proposed future ideas to Section IV: Long Term MTW Plan.

Section VI: Ongoing MTW Activities

HUD Comment 20

In future submissions, OHA should organize all information in this section by activity as per Attachment B. There is not need for a separate table at the beginning of the section listing each activity name.

OHA Response to Comment 20

The requested format changes are incorporated in the revised Plan and will become the standard for all future Plan submissions.

HUD Comment 21

Page 24-35 Attachment B requires that OHA provide an update on the status of each ongoing MTW activity in the Annual MTW plan, Section VI.B. OHA provides much more than this for each of its ongoing activities, and while this information is interesting, it is duplicative to what OHA provides in its Annual MTW Report. HUD recommends OHA retain the description and table containing implementation steps/timetable/status, but that OHA remove the reporting on outcomes and metrics.

OHA Response to Comment 21

OHA has followed HUD'S recommendation and removed all text except the table containing implementation steps/timetable /status of each ongoing activity.

Page 24-35 **HUD Comment 22**

In Section VIB, please include grid lines on the tables listing implementation steps, timetable/status. On some of these tables the absence of grid lines makes it difficult to see which statuses link to which steps (for example the table on page 27).

OHA Response to Comment 22

OHA has responded to HUD's request to insert grids on the tables listing implementation steps, timetables/status.

Page 39

HUD Comments 23

Information on uses of Funds A, B, and C should be reported in Section VII as part of the discussion of OHA's use of single fund flexibility. These are not MTW activities in the sense that they do not require any MTW authorization outside of single fund flexibility to implement.

OHA Response to Comment 23

OHA has included the discussion of the uses of Funds A, B, and C in how it will use its single fund flexibility in Section VII.

Page 36

HUD Comment 24

In Section VI. C, OHA should add a sentence to clarify that no changes are being made to the Attachment C/D authorizations for ongoing MTW activities in FY14.

OHA Response to Comment 24

OHA added a statement that it is not requesting any changes to be made to Attachment C/D authorizations for ongoing MTW activities in FY14.

Page 36

HUD Comment 25

In Section VI. C, OHA should remove the statement regarding the need for authorization D.7.a from Attachment C for Activity 6. This addition of this authorization was previously approved by HUD in an amendment to OHA's FY13 Plan.

OHA's Response to Comment 25

OHA removed the statement regarding the need for authorization D.7.a from Attachment C for Activity 6.

Section VII: Sources and uses of Funds

Pages 38

HUD Comment 26

On pages 67-68, under the heading "Planned Sources and Uses of State/Local Funds, OHA discusses its MTW Self-Sufficiency Resource Center and self-sufficiency rent floor, noting the numerous partners and collaboration with local efforts. This information is helpful but not related to the sources/uses of state and local funds requested in this section. This information should be discussed when discussing the ongoing MTW activity in Section VI. Please remove this information from Section VII.

OHA's Response to Comment 26

OHA has removed the information from Section VII concerning the Self-Sufficiency Resource Center and self-sufficiency rent floor.

Page39

HUD Comment 27

While not required, it would be helpful if OHA provided information on its current reserve levels and planned uses of reserve funds.

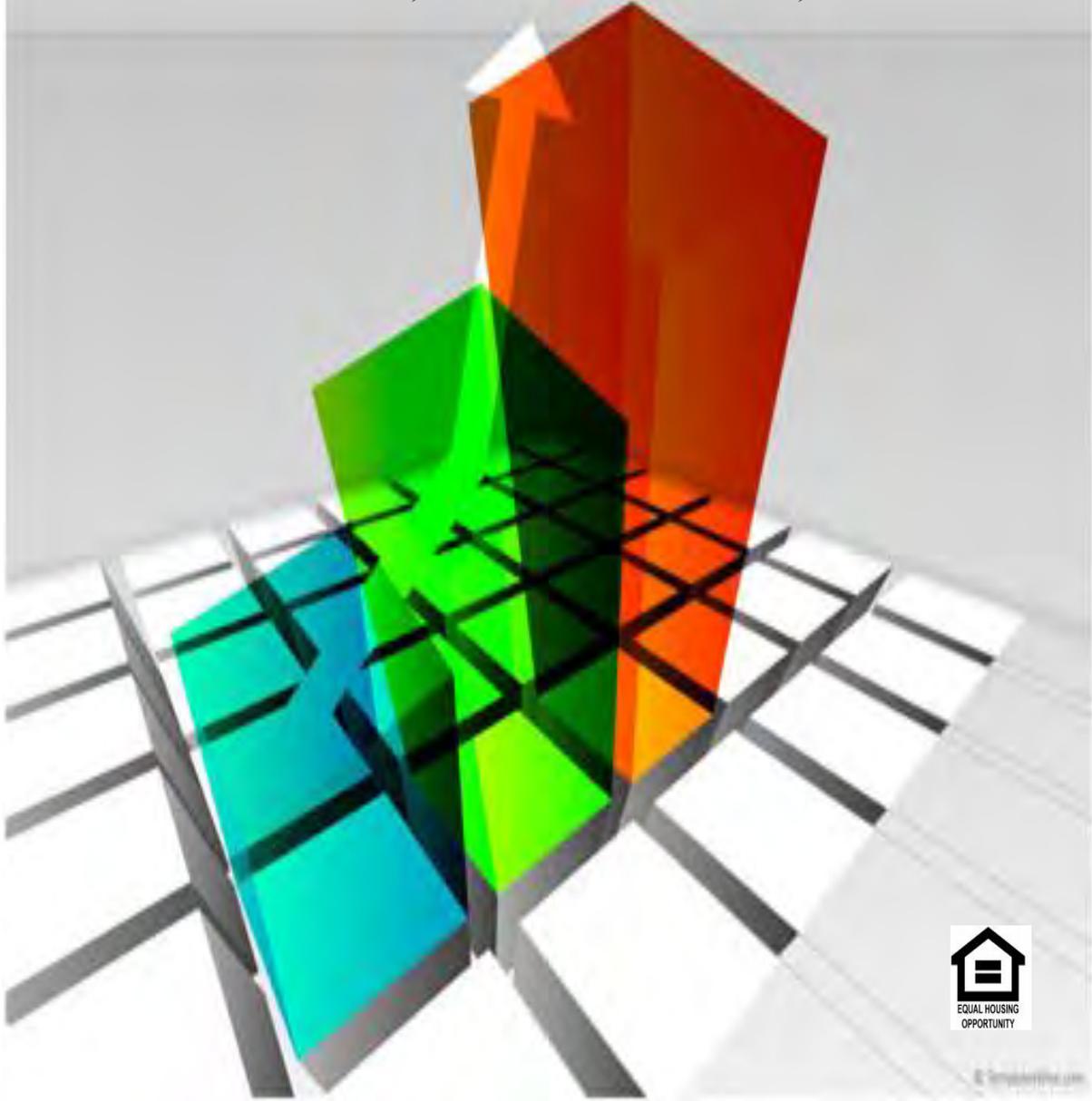
OHA's Response to Comment 27

As with other public housing agencies, OHA is experiencing fiscal impacts from sequestration resulting in a reduced agency budget. OHA plans to use its reserve to support OHA programs.

Section VIII: Administrative

No Comments from HUD.

**ORLANDO HOUSING AUTHORITY
MOVING TO WORK (MTW)
PLAN FOR YEAR 3
APRIL 1, 2013 TO MARCH 31, 2014**



ORLANDO HOUSING AUTHORITY (OHA)

MTW PLAN FOR YEAR 3

(APRIL 1, 2013 TO MARCH 31, 2014)

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SECTION I. INTRODUCTION

B. Overview of the Agency's Moving to Work Goals/Objectives for Year 3: April 1, 2013 March 31, 2014

The Orlando Housing Authority (OHA) began implementation of its Moving to Work (MTW) Demonstration Program in January 2011, following the execution of the Amended and Restated MTW Agreement with the U.S. Department of Housing and Urban Development (HUD) on January 7, 2011. The program goals and objectives of the Authority's MTW Plan for the Initial 15-Month Demonstration Period began January 7, 2011 and ended March 31, 2012. The MTW Activities were designed to address the three statutory purposes of the Demonstration Program which are to: (A) increase cost effectiveness, (B) increase self-sufficiency, and (C) increase housing choices for low-income families.

The Orlando Housing Authority (OHA) continues to implement all approved Moving to Work (MTW) Activities and Uses of Funds contained in its Plan for the Initial Demonstration Period, all of which were carried over in the Agency's approved MTW Plan for Year 2 that began April 1, 2012 and will end March 31, 2013. All of the approved Activities and Uses of Funds are ongoing. Many of the Activities have multiple components to be phased-in over several years.

The Orlando Housing Authority (OHA) will continue to devote its attention to implementing the very ambitious multi-year initiatives begun in Initial Demonstration Period and continued in Year 2. However, the OHA is considering two new activities related to approved Activity 1 that it may propose as amendments to the Year 3 MTW Annual Plan which are described in Section V of this document (See Tab 5).

Below is list of the Authority's ongoing approved Moving to Work Activities and Uses of Funds, identifying the statutory purpose(s) to which each relates.

MOVING TO WORK (MTW) ACTIVITIES

Moving to Work (MTW) Activity 1:

Phase-in implementation of a self-sufficiency Rent Floor (\$225) for households with non-elderly, non-disabled adults, with hardship exceptions linked to self-sufficiency activities. (Statutory purposes A and B)

Moving to Work (MTW) Activity 2:

Streamline the recertification process in the public housing and voucher programs: Three year recertification of elderly and disabled clients. (Statutory purpose A)

Moving to Work (MTW) Activity 3:

Streamline the rent calculation process in the public housing and voucher programs: modified third-party verification and disregard income from the first \$25,000 in assets. (Statutory purpose A)

Moving to Work (MTW) Activity 4:

Consolidate inspection and recertification requirements: conduct unified recertification and inspection processes by geographic location rather than anniversary date. (Statutory purpose A)

Moving to Work (MTW) Activity 5:

Provide Interim Voucher Assistance and Related Counseling to Prevent Foreclosure: serve up to 50 homeowners with six month interim vouchers at any given time. (Statutory purposes B & C)

Moving²²² to Work (MTW) Activity 6:

Partner with the Wayne Densch Center, Inc. and other OHA-approved housing support services agencies to provide transitional housing units with supportive services at the West Oaks Apartment. for formerly homeless households and households in imminent danger of becoming homeless, who are under case management, using up to 50 “floating” project-based Section 8 vouchers. (Statutory Purposes B and C)

Moving to Work (MTW) Activity 7:

Use project-based vouchers and other resources to develop City-donated property for low-income elderly housing (Redevelop Jackson Court/Division Oaks. (Statutory purpose C)

MOVING TO WORK (MTW) USES OF FUNDS

Moving to Work (MTW) Use of Funds A:

Provide a comprehensive One-Stop Self-Sufficiency Resource Center to promote use of single-fund flexibility. (Statutory purpose B)

Moving to Work (MTW) Use of Funds B:

Take every reasonable step to complete the greening of the Authority. (All statutory purposes)

Moving to Work (MTW) Use of Funds C:

Provide for effective evaluation of Moving to Work initiatives using single-fund flexibility - Annual Evaluation of MTW Activities by the University of Central Florida (UCF) (All statutory purposes)

During Year 3, the Orlando Housing Authority will continue to implement all of the currently approved activities and uses of funds listed above. This includes the planned phase-in of Moving to Work (MTW) Activities 1, 2, 3 and 4, as described below:

MTW Activity 1: “Phase-in implementation of a self-sufficiency Rent Floor (\$225) for households with non-elderly, non-disabled adults, with hardship exceptions linked to self-sufficiency activities.”

A Self-Sufficiency Rent Floor will be phased in over four years to apply to public housing and voucher households with non-elderly, non-disabled adult members. The Rent Floor initially will be set at \$225 per month, prior to the provision of the utility allowance. All households, however, shall pay rent after the provision of utility allowances of at least \$100. The minimum Rent Floor is set at approximately 30% of gross income for an individual working at the minimum wage, 25 hour per week.

This Activity is linked to Moving to Work (MTW) Use of Funds Action A: “Provide a Comprehensive One-Stop Self-Sufficiency Resource Center to promote use of single-fund flexibility”. This Activity is described below. All non-elderly/nondisabled adult members from households subject to the Rent Floor but are unable pay the minimum \$225 monthly rent will be referred to and must participate in MTW Resource Center self-sufficiency activities, including budget and employment counseling. All households referred to the Resource Center will receive up to two years of case management and employment counseling, with referrals for job training, placement and support services, with an additional year on a case by case basis. The Resource Center Case Manager will work with the client to develop an Individualized Plan of Action based on an initial needs assessment. The household will be required to sign an agreement encompassing goals and expectations for their participation in MTW Resource Center activities. A hardship exemption from the minimum Rent Floor may be granted under certain circumstances beyond the household’s control, but is tied to required participation in self-sufficiency activities.

In Year³³³, this Activity will be implemented at three more public housing sites: Lake Mann Homes, Marden Meadows Apartments, and Omega Apartments. With the addition of these three sites, all of the Authority's public housing communities, excluding those designated as elderly or elderly/disabled sites will be covered under the Moving to Work (MTW) Self-Sufficiency Rent Floor. As of September 1, 2012, twenty-four (24) residents of Lake Mann Homes, Marden Meadows Apartments and Omega Apartments cannot meet the minimum Rent Floor and will be referred to the MTW Resource Center beginning in April 2013. All new admissions to public housing are subject to the Rent Floor and, beginning April 1, 2013, all new admissions to the Housing Choice Voucher/Section 8 voucher program will also be subject to the Rent Floor.

MTW Activity 2: "Streamlining of the Recertification Process in Public Housing and Voucher Programs."

This Activity involves three (3) year recertifications of all elderly/disabled households residing in public housing and participating in the Voucher Program, with automatic annual adjustments for fixed income program (e.g., social security or supplemental security income) cost of living increases. This ongoing Activity, which is designed to increase cost effectiveness in the administration of both the Public Housing and Section 8 Voucher Programs was fully implemented for during the Initial 15-month Demonstration period. The goal of this Activity is to reduce the amount of staff time spent on recertification of elderly and disabled households by 50%. The ongoing implementation of this Activity, in coordination with implementation of MTW Activity 3 and MTW Activity 4, as described below should allow the OHA to meet this goal in Year 2 and Year 3 of the Demonstration.

MTW Activity 3: "Streamlining of the Rent Calculation Process in Public Housing and Voucher Programs."

This Activity which involves the use of modified third party verification procedures and the disregard of income from the first \$25,000 in assets was implemented for all public housing residents and applicants and for all voucher program participants during the Initial 15-Month Demonstration Period beginning March 1, 2011 and ending March 31, 2012). Implementation is ongoing. Staff will continue to use the employment verification form, allowing residents/clients/applicants to bring in the completed form rather than requiring that the form to be mailed to the Administrative Office. Staff will call the employer to verify the information contained in the completed form. In lieu of written third-party verifications, households can also submit official documentation of income (such as pay stubs). Public Housing residents/Section 8 clients/applicants will also be allowed to submit official documentation of unearned income, irregular, and other forms income, assets, deductions and exemptions. If there is any in doubt regarding the authenticity/veracity of any of information provided by the resident/client/applicant, staff will use the traditional established third-party verification protocol for confirmation purposes. The Enterprise Income Verification (EIV) system will continue to be used to verify and monitor income.

This ongoing Activity is also designed to increase cost effectiveness in the administration of both the Public Housing and Section 8 Voucher Programs. The goals of this Activity are to 1) reduce staff minutes spent on rent calculations and recertifications by 50% for elderly and disabled households and by 10% for other households, 2) reduce staff minutes spent on third party verifications by 50%, and 3) reduce the amount of time required to complete the recertification process from 90 days to 60 days.

Collection of data required to evaluate the impact of this Activity is being phased in over several years. Thus far, the data collection is limited to elderly and disabled public housing residents and Section 8 voucher

program⁴⁴⁴ participants and non-elderly/non-disabled families, and at the five public housing communities currently subject to the self-sufficiency Rent Floor. Because the data does not include non-elderly and non-disabled families at the other public housing sites operated by the OHA, or non-elderly and non-disabled Section 8 voucher program participants, the full impact of this Activity will not be known for several years.

During Year 3, data collection activities will be expanded to include capturing the amount of time spent third-party verification, rent calculation and annual recertifications of all non-elderly and /non disabled households at all public housing communities operated by the Authority, as well as continuing data collection for elderly and disabled public housing residents and Section 8 voucher program participants. Beginning in Year 4 (4/1/14 to 3/3/15), the OHA will begin to track the amount of time spent on recertifications/rent calculations for all public housing residents and all Section 8 program participants, allowing to the Agency to determine the extent to which the Activity has resulted in greater efficiency and increased cost effectiveness in administration of the public housing and voucher programs.

MTW Activity 4: “Consolidate inspection and recertification requirements,” which involves implementing a regional re-examinations and inspections of public housing and Section 8/Housing Choice Voucher Program dwelling units.”

This Activity is also designed to increase cost effectiveness in the administration of both the Public Housing and Section 8 Voucher Programs and is related to and will encompass efficiencies/cost savings to be derived from MTW Activity 2 and 3, as described above. It is anticipated that the standardization and coordination of inspection and recertification processes among the programs would result in a reduction in staff time, thus increasing cost-effectiveness and freeing up resources for other MTW activities. This would occur because inspectors could undertake annual inspections in the same complexes within geographic areas, thus saving time and money on transportation. Similarly, recertifications could be organized to cover all assisted families within geographic areas where public housing and voucher-assisted stock is located.

During the Initial 15-month Demonstration Period, the OHA developed a plan to consolidate the inspection and recertification requirements for all public housing residents and Section 8 clients. In Year 2 (4/1/12 to 3/31/13), the Authority began to conduct recertifications based on geographic location instead of by the program participant’s anniversary date. Inspections of public housing units based on geographic location began in August 2012: implementation of a coordinated inspections and recertification process geographic location will begin in April/May 2013.

The OHA plans to use the standard Housing Quality Standard (HQS) protocol/inspection form (HUD Form 52580-A) for inspection HCV/Section 8 assisted units in the private housing market and standard UCP forms for inspection of the Authority’s public housing units .

MTW Activity 5: Provide Interim Voucher Assistance and Related Counseling to Prevent Foreclosure.”

Through this Activity, the Orlando Housing Authority (OHA) will provide interim voucher assistance, generally for up to 6 months and not for more than one year, for homeowners that are newly unemployed or otherwise facing temporary hardships due to unforeseen circumstances such as reduction in or loss income, divorce, medical issues, etc. and are threatened with foreclosure. Financial assistance will be provided to families who are experiencing these issues in the form of monthly mortgage assistance for a period generally of up to 6 months up to the amount of the payment standard for the bedroom size of the unit. The OHA may make monthly homeownership assistance payments on behalf of the participant to include the following: (1) mortgage principal and interest, (2) mortgage insurance, (3) real estate taxes, and (4) homeowner's insurance. If the total principal and interest payments are less than or equal to the payment standard in the Orlando MSA, participants

will pay⁵⁵⁵ 30% of their adjusted monthly income toward expenses and the OHA will pay the balance directly to the mortgage company.

Implementation of this Activity was delayed until Year 2, following a determination that additional program planning was necessary, including building additional community partnerships and program procedures to ensure effective execution. The latter resulted from an unexpected loss of the planned partnership with the City of Orlando. Initially, the OHA intended to provide interim voucher assistance to eligible homeowners that received financial assistance through the City of Orlando's Foreclosure Prevention Program. The City's program, paired one-time financial assistance with comprehensive foreclosure prevention counseling. Funding for this program is no longer available; therefore, the City is no longer providing financial foreclosure prevention assistance. For this reason, the OHA was forced to revise the MTW Foreclosure Prevention program to incorporate partnerships with local housing counseling agencies.

Initially, the Orlando Housing Authority (OHA) will partner with two certified housing counseling agencies that will provide counseling, including budgetary counseling and case management of program participants. Referrals for the MTW Foreclosure Prevention Program will come from the OHA's Homeownership Counselor (homeowners assisted via HOPE VI), and from partner counseling agencies. Counselors will provide documentation and a certification verifying achievement of loan modification, restructure, or payment arrangement on behalf of the homeowners. The OHA will convene weekly teleconference meetings for participating agencies to review status of referrals, challenges and successes, etc. Upon approval for participation in the program, voucher recipients will work with counseling agency staff to develop individual case plans outlining goals and strategies to enhance their self-sufficiency and achieve their short term budgetary goals.

The Orlando Housing Authority (OHA) will begin the implementation phase of the program in January-February 2013. During the remaining four months of Year 2 ending March 31, 2013, the OHA expects to provide interim voucher assistance to up to five (5) household's case managed by two certified housing counseling agencies. In Year 3, the OHA anticipates that the number of partner agencies will increase as program develops and stabilizes and that at least ten (10) households will receive interim voucher assistance, preventing loss of their homes from foreclosure.

Moving to Work Activity 6: "Partner with the Wayne Densch Center, Inc. and other OHA-approved housing support services agencies to provide transitional housing units with supportive services at the West Oaks Apts. for formerly homeless households and households in imminent danger of becoming homeless, who are under case management, using up to 50 project-based Section 8 vouchers."

This initiative will serve formerly homeless persons and households in imminent danger of becoming homeless, who are under case management. The initiative at West Oaks will provide transitional housing for up to 18 months. The homeless service agencies will provide ongoing case management, one-on-one counseling, health and social services, etc. The goal is to increase self-sufficiency and employability skills of homeless clients by providing transitional housing assistance in one-bedroom apartment units at the OHA-owned, West Oaks Apartments complex.

Implementation of MTW Activity 6 has been delayed for two reasons: 1) a need to secure additional government approvals, and 2) a need to develop additional community partnerships. The OHA originally planned to implement this initiative by securing Annual Contribution Contract authority for up to 50 "floating" public housing units at West Oaks Apartments. The plan was subject to approval by the bond-holder for the property, Fannie Mae. In March 2012, Fannie Mae officially notified the OHA that they will not allow ACC units to be placed at West Oaks due to loan subordination. In addition this initiative was originally to be coordinated with and through the Orlando Commission on Homelessness, which became inactive during

planning⁶⁶⁶ phase and no longer functions as a regional planning and coordinating body. Instead, the Orlando Housing Authority will partner with the Wayne Densch Center Inc. and other OHA-approved homeless support services agencies to implement this initiative.

In June 2012, the Orlando Housing Authority (OHA) submitted a request to the HUD Moving to Work (MTW) Office for approval to amend the approved Year 2 Implementation Plan for MTW Activity 6 to use up to 50 Section 8 project-based vouchers to implement this initiative. Approval of the requested change was necessary to ensure the financial viability/feasibility of the initiative. The OHA clarifies that while project-based vouchers have been substituted for public housing as the subsidy to be used for this MTW Activity at West Oaks, the OHA still intends for the subsidized units to be “floating units.” The HUD MTW Office approved the proposed change August 20, 2012.

The Orlando Housing Authority (OHA) staff met with officials of the Wayne Densch Center and the property manager for West Oaks Apartment and devised a protocol for the leasing of one-bedroom units at the complex to formerly homeless individuals in case management. On August 23, 2012, immediately following receipt of HUD approval to use up to 50 project-based vouchers to fund the Activity, the OHA executed a Memorandum of Understanding (MOU) with the Wayne Densch Center, clarifying the roles and responsibilities of each party in achieving the goals of the program.

The OHA expects that at least five (5) formerly homeless households will be housed at West Oaks Apartments by 3/31/13. During Year 3, the Authority projects that it will provide transitional housing for up to 20 such households.

MTW Activity 7: “Use project-based vouchers and other resources to develop City- donated property for low-income elderly housing (Redevelop Jackson Court/Division Oaks).”

Implementation of Activity 7 has been delayed because of a need to obtain government approval and funding from the City of Orlando. To date, the City has been unable to provide suitable land for the redevelopment of Jackson Court/Division Oaks. The OHA also needs to identify a private sector community business partner to ensure the financial feasibility of the proposed redevelopment project.

As of September 7, 2012, the City of Orlando has asked the OHA to consider four alternative building sites. The first property is located at the corner of Terry Avenue, and South Street. The second location is located at the corner of Church Street and Parramore Avenue. The third location is at the corner of Otey Place, Federal Street and Parramore Avenue. The fourth site is the Carver Theatre Development project on the corner of Parramore Avenue and Church Street. All four sites are approximately 3.5 to 4 acres. Each site requires a different building configuration and site redesign in elevation due to the change in the character of each community. The Carver Theatre Development is owned by the Black Business Investment Fund.

The Orlando Housing Authority (OHA) and the City of Orlando (the City) have been in ongoing discussions regarding the redevelopment of Jackson Court. The President/CEO of the OHA has met with officials of the City and the Black Business Investment Fund (BBIF) to discuss incorporating the redevelopment of Jackson Court into their Carver Theatre Restoration Project. The OHA plans to enter into a partnership with the Carver Theatre Developers, Inc. to replace the Jackson Court units within their new planned development of 100 units of senior mixed income housing located in the Parramore area of the City of Orlando.

The Orlando Housing Authority (OHA) has executed a Memorandum of Understanding with the Caver Park Theatre Developers, Inc. with a commitment to provide a minimum of 45 project-based vouchers for the seniors that would be displaced through the redevelopment plan. These 45 vouchers will come from the OHA’s existing Section 8 voucher allocations which will become available at the time the newly redeveloped housing

units are ready for occupancy. The Carver Park Theater Developers, Inc. is awaiting a decision on their application for construction financing. The project is delayed until adequate financing has been secured. The OHA will continue to explore alternative for redevelopment of Jackson Court/Division Oaks during the remainder of Year 2. If the Carver Park Theater Developers, Inc. is unable to obtain financing, the OHA will renew its efforts to secure an alternative site and financing mechanism for the proposed redevelopment during Year 3.

Use of Funds Actions A, B and C will also be continued in Year 3 as discussed below:

MTW Use of Funds Action A: “Provide a comprehensive One-Stop Self-Sufficiency Resource Center to promote use of single-fund flexibility.”

This Activity is linked to Moving to Work (MTW) Activity 1: “Phase-in implementation of a self-sufficiency Rent Floor (\$225) for households with non-elderly, non-disabled adults, with hardship exceptions linked to self-sufficiency activities,” Use of Funds Action A designates funding to establish and operate a comprehensive One-Stop Self-Sufficiency Resource Center. The MTW Resource Center provides and/or facilitates access to a range of self-sufficiency services for non-elderly/non-disabled public housing residents who are unable to pay the minimum Rent Floor of \$225 per month from earned income. The Resource Center provides needs assessment, case management, employability counseling, and other supportive services, including, but not limited to referral of program participants for employment interviews and job placement resources.

The Resource Center invites service providers to meet with public housing residents on-site and hosts job fairs quarterly. It also provides a computer lab with in-house training, affording clients access to job vacancy postings and access to on-line. To assist families in securing and maintaining employment, the Resource Center helped to facilitate the establishment of a child care facility offering non-traditional service hours during evenings, nights, and/or weekends. The child care center is at the OHA’s Reeves Terrace Apartments public housing complex. The Resource Center also provides bus tickets to MTW participants to assist them with transportation to job interviews and related appointments, and to their places of employment. In addition, the Center leverages community resources and connects residents to partner agencies throughout greater Orlando/Orange County area, providing linkages to basic education, job readiness training, and job training programs.

The Initial 15-Month Demonstration Period began January 7, 2011 and ended March 31, 2011. Thirty-eight (38) clients were required to participate in Resource Center activities; thirty (30) women and eight (8) men. The results are very encouraging. The Resource Center has surpassed initial goals in a difficult job market.

As indicated in the OHA Report for the Initial Demonstration Period, the overall earned income for the thirty-eight (38) clients required to participate in self-sufficiency services provided or arranged through the Orlando Housing Authority (OHA) Moving to Work (MTW) Resource Center increased from \$188,515 to \$259,389, an aggregate increase of thirty-eight (38%) at the end of the initial project period (1/7/11 to 3/31/12). The established a goal (benchmark) for this Activity is to increase the total earnings of families with non-elderly and non-disabled adults by five percent (5%) each year starting in the third MTW Year beginning April 1, 2013 through March 31, 2014. Aggregate data indicates that, during the period, the OHA made substantial progress in meeting the overall goal of increasing family income. However, the achievements of individual program participants varied widely and the initial success enjoyed by some of the program participants needs to be sustained over time.

While program results are encouraging, significant barriers to increased self-sufficiency persist. These barriers need to be addressed. The most common barriers to employment cited by program participants were (1) lack of

adequate⁸⁸⁸ education and job experience, (2) lack of reliable transportation, and/or (3) a lack of affordable childcare. While the overall employment picture for Orlando and Orange County, FL improved slightly over the course of the Initial 15-month Demonstration Period, there have been sporadic layoffs and frequent reductions in work hours.

As of August 31, 2012, seventy-seven (77) clients who are unable to pay the minimum Rent Floor are receiving services through the Resource Center; thirty-two (32) clients are from the Initial 15-Months Demonstration Period and forty-five (45) are from Year 2. During the remainder of Year 2 and in Year 3, the Orlando Housing Authority (OHA) Moving to Work (MTW) Resource Center will continue to forge partnerships with public and private organizations to design and implement services to address identified barriers to achieving greater self-sufficiency among program participants. A second non-traditional child care center with expanded hours of operation is being planned and will be located at the OHA's Ivey Lane Homes' public housing community. The child care center is expected to become operational during Year 3.

The Orlando Housing Authority (OHA) will renew negotiations with LYNX, Orlando/Orange County's Public Transportation System Authority to devise a plan to provide greater access to job opportunities for MTW Resource Center program participants through an expansion in the hours of operation of the public transportation system to include some late evening and night-time hours. The goal is to make affordable transportation available when it is needed. The projected completion date for execution of a Memorandum of Understanding (MOU) with LYNX is February/March 2013, thereby making the goal of providing clients access to affordable public transportation available beginning April/May 2013. In the interim, the Resource Center will continue to provide bus tickets to MTW participants to assist them with access to transportation to jobs.

The Orlando Housing Authority (OHA) will also enter into discussions with Orange County Public Schools and/or Goodwill Industries to implement an on-site GED program at the MTW Resource Center at Ivey Lane Homes. The Resource Center will schedule more job fairs and invite prospective employers to the Center to speak with participants, and will plan other activities designed to match program participants' skills with the needs of employers. These actions were recommended by University of Central Florida reviewers in their Evaluation Report on the OHA's MTW Program during the Initial Demonstration Period that began January 1, 2011 and ended March 31, 2012.

MTW Use of Funds Action B: "Take every reasonable step to complete the greening of the Authority."

Use of Funds Action B designates funding to continue the Greening of the Orlando Housing Authority (OHA) including energy conservation work to help reduce utility expense and making improvements at public housing communities that contribute to the healthier living environment for residents. This initiative supports all three statutory objectives of the Moving to Work (MTW) Demonstration Program. Cost-effectiveness can be served by further reductions in utility expenses, which will help both the OHA and its public housing residents. The initiative will promote self-sufficiency among public housing residents by creating a healthier housing environment, better enabling them to work. The initiative supports housing choice by providing for better quality, more environmentally safe and affordable housing options for low and very low-income income residents of Orlando and Orange County.

During the Initial Demonstration Period, the Orlando Housing Authority (OHA) began to explore opportunities for expanding the implementation of the greening initiative throughout the Agency. This initiative began with an evaluation of air quality within living units and adjacent common areas/hallways at each public housing site to assess (1) temperature, (2) humidity, (3) carbon monoxide, and (4) carbon dioxide levels. The results of the assessment varied from unit to unit depending upon the household composition, and the size, age, and condition of the dwelling unit. The Indoor Air Quality Report prepared by Elite Mold Services, Inc. in October 2011

measured⁹⁹⁹ air quality readings against established government and industry environmental standards and guidelines and was not designed to identify physical modifications needed to address air quality issues.

In August 2012, the Orlando Housing Authority (OHA) issued a task order to an architectural firm to begin the development of a needs assessment with recommendations for design improvements that will address issues identified in the Indoor Air Quality Report. Physical changes recommendations in the Needs Assessment Report will be prioritized and will be completed over the next five or more years using funding from the OHA's Capital Fund budget. In addition, the OHA will work with Enterprise Community Partners (Enterprise) to identify other sources of funding for needed physical improvements.

During the last quarter of Year 2, the Orlando Housing Authority (OHA) will work working with representatives of local power companies to develop and provide training to public housing residents in the areas of energy conservation and greening initiatives. OHA staff will also research applicable grants to support energy the conservation education seminars, which will be provided all public housing residents beginning during Year 3.

MTW Use of Funds Action C: “Provide for effective evaluation of Moving to Work (MTW) Initiatives using single-fund flexibility -- Annual Evaluation of MTW Activities by the University of Central Florida (UCF).”

This initiative is ongoing. The initiative supports all three statutory objectives of the Demonstration Program, by closely tracking the Orlando Housing Authority’s (OHA) success in implementing its Moving to Work (MTW) initiatives, meeting program benchmarks/goals, and by encouraging timely changes to make the activities more effective. The University Of Central Florida (UCF) was named as the OHA’s partner in evaluating the Agency’s Moving to Work Program in its approved application to HUD for Designation as an MTW Agency. Objective, external evaluations of the impact of the OHA’s MTW Program Activities and Uses of Funds will be conducted by the UCF annually, with the cost, scope and complexity of the assessments increasing over time as program initiatives become fully implemented. The OHA will address all UCF program recommendations within 90 to 120 days of receipt of the annual Evaluation Report.

SECTION II. GENERAL OPERATING INFORMATION**A. Housing Stock Information**

Number of public housing units at the beginning of the year; (ACC as of 4/1/13)	1,511
General description of any planned significant capital expenditures by development (>30% of the Agency's total budgeted capital expenditures for the fiscal year); OHA will use its capital funds to make site improvements (parking lots), improve dwelling structures (Ivey Lane), and for non-dwelling equipment (the purchase of a bus/van).	N/A
Description of any new public housing units to be added during the year by development (specifying bedroom size, type, accessible features, if applicable);	N/A
Number of public housing units to be removed from the inventory during the year by development specifying the justification for the removal;	N/A
Number of MTW Housing Choice Vouchers (HCV) units authorized (<i>Total does not include special program vouchers or vouchers from Sanford Housing Authority</i>).	2,303
Number of non-MTW HCV units authorized; and Non-Elderly/Non-Disabled: 100 VASH: 425 SRO: 100 TOTAL: 625	625
Number of HCV units to be project-based during the Plan year, including description of each separate project. 45 project-based vouchers will be utilized in implementing planned MTW Activity 7: "Use project-based vouchers and other resources to develop city-donated property for low-income elderly housing." This Activity draws on waivers from authorization of D. 7 a of Attachment C of OHA's executed Standard MTW Agreement. This Activity involves the redevelopment of Jackson Court and Division Oaks. OHA is entering into a partnership with Carver Theatre Developers to replace these units within their new proposed development of 100 units of senior mixed income housing in the City of Orlando. OHA has executed a MOU with the Carver Park Theatre Developers with a commitment to provide a minimum of 45 project-based vouchers for the seniors that would be displaced through the redevelopment plan. In Year 3, up to 20 floating project-based Section 8 vouchers will be utilized to implement planned MTW Activity 6: "Partner with the Wayne Densch Center, Inc. and other OHA-approved housing support services agencies to provide transitional housing units with supportive services at the West Oaks Apts. for formerly homeless households and households in imminent danger of becoming homeless, who are under case management, using up to 50 project-based Section 8 vouchers."	65*

*This number could be reduced to 20 project-based vouchers at the West Oaks Apartments, if the Carver Park Theater Developers are unable to secure financing for the project to include the redevelopment of Jackson Court/Division Oaks.

B. Leasing Information, Planned

Anticipated total number of MTW PH units leased in the Plan year; Total as of 4/1/13 - Assumes 15 units reserved for special purposes and an average vacancy rate of 40 units.	1,456
Anticipated total number of non-MTW PH units leased in the Plan year;	N/A
Anticipated total number of MTW HCV units leased in the Plan year; <i>Currently, OHA has reached 90% of its budget authority.</i> *Data source is VMS submission for 11/1/2012	2,149
Anticipated total number of non-MTW HCV units leased in the Plan year; and Non-Elderly/Non-Disabled: 94* VASH: 334* SRO: 91** TOTAL: 445* *Data source is VMS submission for 11/1/2012 **Data source is Elite report for 11/1/2012	519
Description of anticipated issues relating to any potential difficulties in leasing units (HCV or PH). These issues have far more impact on public housing occupancy than on voucher program unitization. A substantial number of applicants for Public Housing fail criminal background checks at the time of admission, making it difficult to fill vacancies from the waiting list in a timely manner. The lack of public transportation from the available public housing unit to the applicant's place of employment often results in applicant's refusing the unit, which also extends the time required to fill vacancies. In addition, a significant number of public housing residents fail criminal background checks at the time of recertification resulting in their termination, which increases the number of vacant units which must be filled from the waiting list. Similarly, some Section 8 program participants fail criminal background checks at the time of recertification or moves, which may result in their termination. A sizeable number of Section 8 clients are also terminated for program violations. Other clients, primarily elderly or disabled are hospitalized for extended periods or are in nursing homes and are no longer able to live in their unit through no fault of their own. OHA does not anticipate any significant delay in refilling these vouchers. All of the tenant protection vouchers issued to former residents of the vacated Sanford Housing Authority (SHA) public housing sites will become OHA MTW vouchers during the Plan Year 2. A number of these clients may be terminated for failed criminal background checks and/or program violations, resulting in a need to refill unencumbered vouchers from the SHA Section 8 waiting list.	Criminal backgrounds Lack of transportation

<p>OHA ^{12/12/12} reviewed its leasing data and taken into account the planned MTW activities for FY14. Give the current environment of sequestration resulting in reduced budgets; OHA currently has no plans to change its leasing projections. However, OHA will review the feasibility of changing its payment standard to reduce payments to 90% of FMR.</p> <p>B. Leasing Information, Planned (continued)</p>	
<p>Leasing issues related to non-MTW vouchers.</p> <p>Issues impacting the leasing of SRO units include unexpected vacancies created by the deaths of clients due to illness, and frequent turn-overs due to the very small size of the units and because the units are located in an undesirable neighborhood. These issues can result in some delay in refilling the units.</p> <p>In the past, filling of VASH Program vouchers has been constrained due to a lack of an adequate number and steady flow of referrals from the Veteran’s Administration, which is a prerequisite for program participation. However, in order to facilitate access to homeless veterans who cannot afford to pay the minimum rent of \$50.00 per month, the OHA Board of Commissioners recently passed a Resolution does not require them to have income to be housed. This will help to increase the number of homeless veterans who can be housed using VASH Program vouchers.</p>	<p>Very small size of SRO units and location of building.</p> <p>Lack of an adequate number and steady flow of required referrals.</p>
<p>Number of project-based vouchers in use at the start of the Plan year:</p>	<p>5</p>

C. ¹³¹³¹³Waiting List Information

The OHA does not anticipate any changes in the structure, or the opening/closing, of its waiting lists.

Demographic Information

The following chart summarizes the number and characteristics of households on the public housing and Section 8 HCV waiting lists at the end of the plan year:

	Public Housing		Housing Choice Vouchers	
Total Number On The Waiting List	7456	100%	665	100%
Distribution by Income Level				
Extremely Low Income	5474	73.42%	275	41.35%
Very Low Income	1609	21.58%	303	45.56%
Low Income	332	4.45	82	12.33%
-				
Distribution by Bedroom Size				
0 Bedrooms	3144	0.43%	181	31%
1 Bedroom	45	0.01%	11	2%
2 Bedrooms	2690	36%	194	29%
3 Bedrooms	1315	16%	193	29%
4 Bedrooms	230	02%	75	9%
5 Bedrooms	21	01%	09	0%
6+ Bedrooms	10	01%	02	0%
Distribution by Family Type				
Elderly Disabled	290	4%	24	6%
Elderly Non-Disabled	421	6%	12	2%
Non-Elderly Disabled	1244	17%	87	22%
Non-Elderly Non-Disabled	5500	73%	542	70%
Distribution by Race of Head of Household				
White	2755	37%	141	22%
Black/African American	3867	52%	493	69%
Asian	42	1%	1	0%
Native Hawaiian/Other Pacific Is.	84	1%	24	1%
Other/Unknown	708	10%	95	8%
Distribution by Ethnicity of Head of Household				
Hispanic or Latino	3159	43%	164	28%
Not Hispanic or Latino	4297	57%	501	72%

Additional Related Information

The Public Housing Waiting List is open. The Section 8/HCV Waiting List is closed. Both the Public Housing and Section 8/HCV Waiting list are purged annually. The OHA assumed management control of the Sanford Housing Authority (SHA) in August 2010. The SHA waiting list has been closed. SHA and OHA

share the same Administrative Plan.

Other Site-Based Waiting Lists.

The Villas at Hampton Park - 48 units for seniors only. There are 780 names on the Waiting List. The Waiting List is closed.

The Villas at Carver Park - 64 units of public housing/tax credit units. There are 843 names on the Waiting List. The Waiting List is closed .

The Landings at Carver Park - 30 public housing/tax credit units. There are 1116 names on the Waiting List. The Waiting List is closed .

No changes are planned for those sites during the fiscal year.

SECTION ¹⁵¹⁵¹⁵ III. NON MTW–RELATED HOUSING INFORMATION

A. Sources and Uses

A list of planned sources of other non-Moving to Work (MTW) HUD funds, excluding HOPE VI, follows. The uses of the funds are evident based upon the sources. Current-year funding is stated, because the Orlando Housing Authority (OHA) does not have different estimates for the coming year at this point. Some of the sources listed, notably the Capital Fund Formula American Reinvestment and Recovery Act (ARRA) funding, will not be recurring awards for 2014.

Vouchers for Non-Elderly Persons with Disabilities - \$624,673

HUD-Veteran Affairs and Supportive Housing (VASH) Vouchers - \$1,957,878

Vouchers for Single-Room Occupancy (SRO) - \$501,704.00: the OHA is the Contract Administrator

Resident Opportunities and Supportive Services (ROSS) - \$215,000

Capital Fund Formula – American Reinvestment and Recovery Act (ARRA) funding - \$0.00

Operation of 456 low-income housing units other than public housing - \$268,529 monthly
The gross potential rent from West Oaks Apartments/Jackson Court/Division Oaks/Antioch Manor

Operation of 26 low income tax credit units at the Landings at Carver Park - \$19,501 monthly; the OHA is the General Partner

B. Description of Non-MTW Activities

The 456 non-public housing low-income housing units that the Orlando Housing Authority (OHA) operates are all rental housing, consisting of the 280-unit West Oaks Apartments development, the 101-unit Antioch Manor Section 202/811 development for the elderly, and the 75-unit Jackson Square/Division Oaks development. The OHA is also the General Partner for 26 low income tax credit units the Landings at Carver Park initially developed using HOPE VI Grant funds.

Some activities previously identified as non-MTW activities are now incorporated in the Orlando Housing Authority's (OHA) Moving to Work (MTW) Program. In August 2010, the OHA was asked by HUD to manage the troubled Sanford Housing Authority (SHA). This effort involved the relocation of 408 former residents of six SHA distressed public housing sites, administration of Section 8 vouchers issued to these 408 households and the absorption and administration of 90 Section 8 Vouchers formerly administered by the SHA. During the Initial Demonstration Period: January 7, 2011 through March 31, 2012, 358 of these vouchers were classified as tenant protection vouchers and were not included in the OHA's MTW voucher program baseline. As of October 1, 2012, all of the Section 8 vouchers issued to former SHA public residents will be OHA MTW Section 8 vouchers and included in our baseline. However, all of these vouchers are designated for residents of the City of Sanford and Seminole County Florida. Beginning in Year 4, all Section 8 voucher program participants will be required to meet the MTW self-sufficiency rent floor of \$225 month.

SECTION IV. LONG-TERM MTW PLAN

A. Long-term Vision

Through the implementation of targeted activities and uses of funds, the Orlando Housing Authority (OHA) will strive to achieve the maximum possible cost-effectiveness/efficiency in the delivery of services, increase resident self-sufficiency and expand housing choices, within the available resources.

With respect to cost-effectiveness, the Orlando Housing Authority's vision is to ensure that the vital federal resources it receives are put to the best possible use - providing the most and highest-quality affordable housing and related services to the residents of the City of Orlando and Orange County, leveraging additional resources to provide the community with expanded affordable housing options and opportunities for economic independence.

With respect to self-sufficiency, the Orlando Housing Authority's vision is to implement a dynamic rent structure providing incentives for its families to sustain and increase earnings through employment, while retaining access to affordable housing. To accomplish this, the OHA will continue to support the operation of a comprehensive, one-stop self-sufficiency resource center that provides and leverages resources to link its residents/clients to services throughout greater Orlando/Orange County area, helps residents prepare for and find jobs, facilitates access to convenient transportation to job centers during relevant hours, and provide childcare during non-traditional hours (evenings/nights/weekends). The OHA believes that all residents and clients receiving housing assistance who can work should receive the necessary support which will enable them to do so.

With respect to housing choice, the Orlando Housing Authority (OHA) will take advantage of every potential resource to increase access to low-income housing and help to address particular community needs such as foreclosure prevention and transitional housing for homeless, in addition to fulfilling its historic role as outstanding provider of public housing and vouchers for low-income households.

With respect to all three Moving to Work (MTW) statutory goals, the Orlando Housing Authority (OHA) will take every reasonable step to complete the greening of the Authority, providing residents with training on ways to reduce their utility bills and ensuring a healthier living environment. The OHA has entered into a long term partnership with the University of Central Florida (UCF) for the evaluation of MTW initiatives, leading to timely improvement in the Authority's MTW Program throughout the course of the Demonstration.

B. Current Strategies

The Orlando Housing Authority's strategy for achieving its vision considers both local needs and opportunities and potential solutions with broad applicability.

Cost-Effectiveness Strategies

The following strategies will contribute to increased cost-effectiveness:

- Implement a self-sufficiency rent floor for households with non-elderly, non-disabled adults that is more cost-effective than the current system
- Streamline the recertification processes and rent calculation by recertifying elderly and disable households every three years, and by disregarding the first \$25,000 of assets for rent calculation purposes and modifying written third-party verification requirements for all public housing residents and voucher programs participants

- Consolidate public housing and voucher recertification and inspection processes to promote efficiency and cost effectiveness in scheduling and allocation of resources
- During future MTW years, implement as appropriate, additional efficiency steps, such as streamlining of other processes regarding, asset management, and utility billing, as well as streamlining other components of the rent calculation process.

Self-Sufficiency Strategies

The following strategies will contribute to increased self sufficiency:

- Implement a self-sufficiency rent floor that removes or reduces work disincentives, complemented by the provision of mandatory case management and employability counseling and supportive services
- Provide a hardship exception mechanism that is sensitive to economic conditions, but also requires households receiving a hardship exemption to participate in self-sufficiency services/activities.
- Develop a comprehensive One-Stop Orlando Housing Authority Self-Sufficiency Resource Center to improve linkages with basic education, work readiness, training and employment opportunities; provide an off-hours day-care facility, enhance and improve coordination and development of existing partnerships for activities such as work readiness training and ultimately, resident business development; build partnerships with major employers; and partner with the local public transportation system to support transportation to employment centers out of the downtown area and at off-hours.

Housing Choice Strategies

The following strategies will contribute to increased housing choice:

- Work in partnership with local certified housing counseling agencies to implement a Foreclosure Prevention Program, providing interim voucher assistance for up to six months, serving up to 50 eligible households over time
- Work in partnership with the Wayne Densch Center and other Orlando Housing Authority -approved housing support services agencies to provide transitional housing units at the OHA's West Oaks Apartment community for formerly homeless households and households in imminent danger of becoming homeless who are under case management, using up to 50 "floating" project-based Section 8 vouchers.

All Statutory Purposes

The following strategies will contribute to achievement of all three statutory purposes:

- Take additional steps to promote greening of the Authority through efforts to reduce utility consumption and costs and improve air quality and environmental conditions to produce healthier housing for residents of the Orlando Housing Authority's public housing communities.
- Contract with the University of Central Florida (UCF) to conduct ongoing independent evaluations of MTW Activities and Uses of Funds. The OHA will address all of the UCF's program recommendations

¹⁸¹⁸¹⁸ Within three to four months of receipt of the annual Evaluation Report. This initiative will facilitate timely changes in programming, making planned activities and uses of funds more effective in meeting statutory purposes of the MTW Demonstration Program - increasing self-sufficiency, increasing cost effectiveness, and increasing housing choices for low-income families.

C. Future Plans/Initiatives/Strategies

As previously noted in Section I.-B, during Year 3 of the MTW Program beginning April 1, 2013 and ending March 31, 2014, the Orlando Housing Authority (OHA) will continue implementing the seven (7) Activities and three (3) Uses of Funds approved for the Initial Demonstration Period and carried over into Year 2. Please see pages 1 through 2, of Section I.-B for a listing of the Approved Activities and Uses of Funds, all of which are ongoing, many with multiple components to be phased-in over several years, and all involve follow-up activities and requiring evaluation over multiple fiscal years to determine if established benchmarks/metrics and statutory purposes are being met.

The Orlando Housing Authority is considering two new activities related to approved MTW Activity 1: “Phase-in implementation of a self-sufficiency rent floor (\$225) for households with non-elderly, non-disabled adults, with hardship exceptions linked to self-sufficiency activities”. The Orlando Housing Authority may propose amendments to the Year 3 MTW Annual Plan. -

The Orlando Housing Authority (OHA) is also considering two related new activities that it may propose as amendments to this Year 3 MTW Annual Plan. First, to promote self-sufficiency among OHA Public Housing residents, residents would be given the option to convert from income-based rents, i.e., 30% of adjusted income to selecting the flat rents option twice during a twelve month period: once at the time of annual recertification and one additional time. See the Attached table of current flat rents. The statute and HUD regulations provide for ability to choose the flat rent option only annually. Second, to simplify flat rents and eliminate flat rents as a possible determining factor for households’ choice of public housing developments, the OHA would eliminate development-by-development flat rents and instead adopt one agency-wide flat rent.

Flat Rate Option Twice Per Year

The first proposed activity, to provide the additional flat rent opportunity, would lessen the potential adverse impact of rent increases resulting in residents paying higher rent amounts than the flat rent amount when a resident goes to work or increases income. The income-based rent option could increase the resident’s rent to an amount substantially higher than the flat rent amount, depending on the new income level. This could be a strong disincentive to family efforts to move toward greater self-sufficiency, as well as a potential hardship to a resident who might gain employment and experience a ballooning of income that might not be sustainable in light of the current economic conditions.

All OHA public housing households would be eligible for the additional opportunity to convert to flat rents. This opportunity could be particularly important for households paying the self-sufficiency flat rent or otherwise served by the MTW Self-Sufficiency Resource Center. The Center staff would ensure that the residents it is helping to become self-sufficient are aware that they may be able to mitigate potential significant rent increases when their incomes increase by promptly converting to flat rents.

Authority-Wide Flat Rent

The second proposed activity, to adopt one Agency-wide flat rent, would complement the first proposed activity by assuring that households with increasing income are not treated differently with respect to the flat rent option within the development that they live. The change would also eliminate the possibility that households contemplating using the flat rent would seek to transfer to other developments solely because a lower flat rent

exists.¹⁹¹⁹¹⁹ Because the rental market and community amenities are similar for all OHA developments, with the possible exception of Marden Meadows apartments, the proposed change would be justified as a reasonable reflection of the similarities among OHA properties with respect to desirability and market position.

The implementation of current initiatives will continue to evolve over the course of the MTW Demonstration Program through 2018. The Orlando Housing Authority (OHA) will refine rent reform and self-sufficiency strategies to incorporate lessons learned through experience and to reflect changes in the economy. Initiatives to expand housing options will be dependent upon funding realities affecting the OHA's capacity and its ability to forge new partnerships to access non-traditional sources of funding. Planning efforts will incorporate an in-depth review and analysis of successful approaches elsewhere in the nation, as well as a review of changes in laws and regulations and opportunities to leverage existing funds. New initiatives, particularly those that will provide additional assistance for the OHA's substantial disabled population, may be able to be undertaken.

There are two additional activities that OHA hopes to begin implementing during Year 4 (April 1, 2014 to March 31, 2015):

1. Provide a mechanism for elderly residents to obtain needed assisted living services with vouchers where possible, by allowing more flexibility in the rent rules so that residents can pay for services that for them are basic living expenses (MTW Year 4)
2. Take advantage of the potential to use ACC resources, project-based vouchers or other resources to support strategic additions to the low-income stock

ORLANDO HOUSING AUTHORITY (rev.02-01-12)
SUMMARY FLAT RENT TABLE

Utility Allowances may vary slightly based on unit type

4-1		GRIFFIN PARK 198 units				
0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom
\$247	\$302	\$327	\$343	\$356	n/a	n/a

4-2/5		REEVES TERRACE 176 units				
0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom
n/a	\$329	\$366	\$441	\$510	n/a	n/a

4-4		LAKE MANN 210 units				
0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom
n/a	\$336	\$371	\$421	\$443	\$472	n/a

4-6		MURCHISON TERRACE 190 units				
0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom
n/a	\$328	\$372	\$441	\$511	\$563	n/a

4-9		IVEY LANE 184 units				
0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom
n/a	\$373	\$436	\$470	\$542	\$592	\$640

4-10		LORNA DOONE 104 units				
0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom
\$305	\$350	n/a	n/a	n/a	n/a	n/a

4-11		MEADOW LAKE 87 units				
0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom
n/a	\$340	n/a	n/a	n/a	n/a	n/a

4-12		JOHNSON MANOR 40 units				
0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom
n/a	\$341	n/a	n/a	n/a	n/a	n/a

4-12A		CITRUS SQUARE 87 units				
0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom
n/a	\$330	\$364	\$440	\$454	n/a	n/a

4-13		OMEGA 74 units				
0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom
n/a	n/a	\$389	\$444	\$487	n/a	n/a

4-14		MARDEN MEADOWS 45 units				
0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom
n/a	n/a	n/a	\$350	\$395	n/a	n/a

4-17		The Villas of Hampton Park 48 units				
0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	6 Bedroom
n/a	\$510	n/a	n/a	n/a	n/a	n/a

Section V.²¹²¹²¹ Proposed MTW Activities: HUD approval requested

Not applicable, except as noted below. Year 3 of the Orlando Housing Authority's (OHA) Moving to Work Program will begin April 1, 2013 and end March 31, 2014. During Year 3, the Agency plans to continue implementing Activities and Uses of Funds the approved for the Initial Demonstration Period that began January 7, 2011 and carried over into Year 2 that began April 1, 2012. See Section VI.-A for a listing of these initiatives. All of the Activities are ongoing; many of them have multiple components that will be phased-in over several years. Section VI.-B provides a status update on progress made in implementing these initiatives in Year 2.

Section VI. A. List activities continued from the prior plan year(s): specify the plan year in which the activity was first identified and implemented.

OHA Moving To Work(MTW) Activities and Uses of Funds

All of the following MTW Activities and Use of Funds Actions were identified in the HUD approved MTW Plan for the Initial Demonstration Period (January 7, 2011 to March 31, 2012). Planning and/or implementation commenced in January 2011 and is ongoing.

MTW Activity 1:

Phase in implementation of a self-sufficiency rent floor (\$225) for households with non-elderly, non-disabled adults, with hardship exceptions linked to self-sufficiency activities.

MTW Activity 2:

Streamline the recertification process in the public housing and voucher programs.

MTW Activity 3:

Streamline the rent calculation process in the public housing and voucher programs.

MTW Activity 4:

Consolidate inspection and recertification requirements.

MTW Activity 5: Provide Interim Voucher Assistance and Related Counseling to Prevent Foreclosure.

MTW Activity 6:

Partner with the Wayne Densch Center, Inc. and other OHA-approved housing support services agencies to provide transitional housing units with supportive services at the West Oaks Apts. for formerly homeless households and households in imminent danger of becoming homeless, who are under case management, using up to 50 “floating” project-based Section 8 vouchers.*

MTW Activity 7:

Use project-based vouchers and other resources to develop City-donated property for low-income elderly housing.

MTW Use of Funds A:

Provide a comprehensive OHA One-Stop Self-Sufficiency Resource Center to promote use of single-fund flexibility.

MTW Use of Funds B:

Take every reasonable step to complete the greening of OHA.

MTW Use of Funds C:

Provide for effective evaluation of MTW initiatives (use of single-fund flexibility).

* Amended in Year 2 Plan

SECTION VI B: PROVIDE AN UPDATE ON THE STATUS OF EACH ACTIVITY**MTW Activities Tracking Matrix for Year 3: April 1, 2013 to March 31, 2014****MTW Activity 1: Phase in implementation of a self-sufficiency rent floor (\$225) for households with non-elderly, non-disabled adults, with hardship exceptions linked to self-sufficiency activities**

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 3 Expectation</u>
Initial year: implement rent floor for new family public housing admissions and at two sites, Ivey Lane and Citrus Square (\$225)	1/7/11 - new PH admission 2/1/11 - current PH sites	Implemented on schedule
Phase in over three years for public housing and in the fourth year for the voucher program, with adjustments as warranted by experience and analysis	Yr. 2 (4/2012)- Reeves (171), Griffin (171), Murchison (188), New PH Admissions Yr. 3 (4/2013) - Lake Mann (207), Omega (73), Marden Meadows (45), New PH Admissions New Section 8 Admissions Yr 4 (4/2014) - All Section 8 Program Participants New PH Admissions New Section 8 Admissions	Implemented on schedule The Year 3 challenge will be to expand the Self-Sufficiency Resource Center program to accommodate households from three (3) more public housing communities that will be subject to the rent floor beginning 4/1/13. The OHA will begin notifying affected households by November 2012.
Provide hardship exemption process sensitive to economic conditions: Establish hardship panel -- D. Council (or designee), R. Pierce (or designee), Resident Commissioner – (Ms. Bruni Alfaro) or designated Resident Association President Establish rules and schedules	Initial Period (1/7/11 to 3/31/12)	Completed Completed

²⁴³⁴²⁴ <u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 3 Expectation</u>
Require participation of households subject to the rent floor in self-sufficiency activities	Establish and operate a Self-Sufficiency Resource Center to accommodate new households that are subject to the rent floor	<p>Implementation is on schedule and is ongoing.</p> <p>The OHA is taking additional steps to accommodate phase-in of new households to be served at the Self-Sufficiency Resource Center. Data as of 1/13 indicates that 214 new households will be subject to the Rent Floor as of 4/1/13.</p> <p>Of these 214 households, 24 have gross rents below \$225 and thus would be subject to the Rent Floor. Since they are currently paying less than the minimum \$225 per month gross rent, they will be referred to the MTW Resource Center to participate in self-sufficiency activities and receive services designed to increase their income and/or earnings potential.</p> <p>A table providing a breakdown of these households by gross rent, bedroom size, & race/ethnicity is presented on the pages which follow.</p>

**LAKE MANN, MARDEN MEADOWS AND OMEGA APTS.
NON-ELDERLY/NON-DISABLED TENANTS - TOTAL: 214**

Rent Amount		Rent by Race			Rent by Bed Size			Rent Amount by Ethnicity		
Gross Rent	Count	Gross Rent	RACE	Count	Gross Rent	Bed Size	Count	Gross Rent	Ethnicity	Count
100	3	100	BLACK	2	253	1	1	100	HISPANIC	1
170	1	176	BLACK	1	312	1	1	185	HISPANIC	1
176	1	183	BLACK	1	170	2	1	209	HISPANIC	1
183	1	184	BLACK	1	176	2	1	224	HISPANIC	2
184	1	189	BLACK	1	195	2	1	225	HISPANIC	1
185	1	195	BLACK	2	204	2	1	231	HISPANIC	1
189	1	198	BLACK	1	211	2	1	238	HISPANIC	1
195	2	204	BLACK	1	215	2	1	241	HISPANIC	1
198	1	211	BLACK	1	220	2	1	245	HISPANIC	1
204	1	212	BLACK	2	224	2	1	287	HISPANIC	1
209	1	215	BLACK	1	225	2	6	303	HISPANIC	1
211	1	217	BLACK	1	225	2	2	326	HISPANIC	1
212	2	218	BLACK	1	227	2	1	347	HISPANIC	1
215	1	220	BLACK	1	239	2	1	350	HISPANIC	5
217	1	224	BLACK	1	240	2	1	371	HISPANIC	3
218	1	225	BLACK	13	241	2	1	387	HISPANIC	1
220	1	226	BLACK	1	242	2	1	389	HISPANIC	3
224	3	227	BLACK	3	246	2	1	395	HISPANIC	1
225	15	228	BLACK	1	247	2	1	421	HISPANIC	4
226	1	233	BLACK	1	249	2	1	443	HISPANIC	1
227	3	235	BLACK	1	253	2	1	444	HISPANIC	4
228	1	239	BLACK	1	258	2	1	466	HISPANIC	1
231	1	240	BLACK	1	266	2	1	487	HISPANIC	1
233	1	242	BLACK	1	270	2	1	497	HISPANIC	1
235	1	244	BLACK	1	277	2	1	100	NON/HISPANIC	2
238	1	246	BLACK	1	281	2	1	170	NON/HISPANIC	1
239	1	247	BLACK	2	300	2	3	176	NON/HISPANIC	1
240	1	249	BLACK	1	312	2	1	183	NON/HISPANIC	1
241	1	251	BLACK	1	315	2	1	184	NON/HISPANIC	1
242	1	252	BLACK	1	319	2	1	189	NON/HISPANIC	1
244	1	253	BLACK	3	331	2	1	195	NON/HISPANIC	2
245	1	258	BLACK	2	342	2	1	198	NON/HISPANIC	1
246	1	260	BLACK	1	349	2	1	204	NON/HISPANIC	1
247	2	265	BLACK	1	353	2	1	211	NON/HISPANIC	1
249	1	266	BLACK	1	362	2	1	212	NON/HISPANIC	2
251	1	270	BLACK	1	363	2	1	215	NON/HISPANIC	1
252	1	271	BLACK	1	366	2	1	217	NON/HISPANIC	1
253	3	275	BLACK	1	371	2	13	218	NON/HISPANIC	1
258	2	277	BLACK	1	389	2	7	220	NON/HISPANIC	1
260	1	281	BLACK	1	392	2	1	224	NON/HISPANIC	1
265	1	282	BLACK	1	399	2	1	225	NON/HISPANIC	14
266	1	286	BLACK	1	413	2	1	226	NON/HISPANIC	1
270	1	287	BLACK	2	421	2	1	227	NON/HISPANIC	3
271	1	289	BLACK	2	671	2	1	228	NON/HISPANIC	1
275	1	298	BLACK	1	100	3	2	233	NON/HISPANIC	1
277	1	300	BLACK	4	183	3	1	235	NON/HISPANIC	1
281	1	306	BLACK	1	184	3	1	239	NON/HISPANIC	1
282	1	308	BLACK	1	185	3	1	240	NON/HISPANIC	1
286	1	312	BLACK	2	189	3	1	242	NON/HISPANIC	1

Rent Amount		Rent by Race			Rent by Bed Size			Rent Amount by Ethnicity		
Gross Rent	Count	Gross Rent	RACE	Count	Gross Rent	Bed Size	Count	Gross Rent	Ethnicity	Count
287	3	315	BLACK	1	195	3	1	244	NON/HISPANIC	1
289	2	316	BLACK	1	198	3	1	246	NON/HISPANIC	1
298	1	318	BLACK	1	209	3	1	247	NON/HISPANIC	2
300	4	319	BLACK	2	212	3	2	249	NON/HISPANIC	1
303	1	320	BLACK	1	217	3	1	251	NON/HISPANIC	1
306	1	322	BLACK	1	218	3	1	252	NON/HISPANIC	1
308	1	324	BLACK	1	224	3	2	253	NON/HISPANIC	3
312	2	325	BLACK	1	225	3	1	258	NON/HISPANIC	2
315	1	326	BLACK	1	225	3	3	260	NON/HISPANIC	1
316	1	328	BLACK	1	225	3	2	265	NON/HISPANIC	1
318	1	329	BLACK	1	226	3	1	266	NON/HISPANIC	1
319	2	331	BLACK	1	227	3	1	270	NON/HISPANIC	1
320	1	332	BLACK	1	228	3	1	271	NON/HISPANIC	1
322	1	337	BLACK	1	231	3	1	275	NON/HISPANIC	1
324	1	339	BLACK	2	233	3	1	277	NON/HISPANIC	1
325	1	342	BLACK	1	235	3	1	281	NON/HISPANIC	1
326	1	349	BLACK	1	238	3	1	282	NON/HISPANIC	1
328	1	350	BLACK	12	244	3	1	286	NON/HISPANIC	1
329	1	353	BLACK	1	245	3	1	287	NON/HISPANIC	2
331	1	362	BLACK	2	251	3	1	289	NON/HISPANIC	2
332	1	363	BLACK	1	252	3	1	298	NON/HISPANIC	1
335	1	365	BLACK	1	253	3	1	300	NON/HISPANIC	4
337	1	366	BLACK	1	258	3	1	306	NON/HISPANIC	1
339	2	371	BLACK	10	260	3	1	308	NON/HISPANIC	1
342	1	374	BLACK	1	265	3	1	312	NON/HISPANIC	2
347	1	375	BLACK	1	271	3	1	315	NON/HISPANIC	1
349	1	376	BLACK	1	275	3	1	316	NON/HISPANIC	1
350	17	381	BLACK	1	282	3	1	318	NON/HISPANIC	1
353	1	382	BLACK	1	286	3	1	319	NON/HISPANIC	2
362	2	386	BLACK	1	287	3	1	320	NON/HISPANIC	1
363	1	389	BLACK	6	287	3	1	322	NON/HISPANIC	1
365	1	391	BLACK	1	289	3	1	324	NON/HISPANIC	1
366	1	392	BLACK	1	298	3	1	325	NON/HISPANIC	1
371	13	395	BLACK	1	300	3	1	328	NON/HISPANIC	1
374	1	396	BLACK	1	303	3	1	329	NON/HISPANIC	1
375	1	399	BLACK	1	306	3	1	331	NON/HISPANIC	1
376	1	404	BLACK	1	308	3	1	332	NON/HISPANIC	1
381	1	413	BLACK	1	319	3	1	335	NON/HISPANIC	1
382	1	421	BLACK	15	320	3	1	337	NON/HISPANIC	1
386	1	426	BLACK	1	322	3	1	339	NON/HISPANIC	2
387	1	443	BLACK	1	325	3	1	342	NON/HISPANIC	1
389	9	444	BLACK	5	326	3	1	349	NON/HISPANIC	1
391	1	452	BLACK	1	328	3	1	350	NON/HISPANIC	12
392	1	479	BLACK	1	329	3	1	353	NON/HISPANIC	1
395	3	483	BLACK	1	332	3	1	362	NON/HISPANIC	2
396	1	487	BLACK	2	335	3	1	363	NON/HISPANIC	1
399	1	496	BLACK	1	337	3	1	365	NON/HISPANIC	1
404	1	671	BLACK	1	339	3	2	366	NON/HISPANIC	1
413	1	350	HW/PI	1	347	3	1	371	NON/HISPANIC	10
421	19	371	HW/PI	1	350	3	17	374	NON/HISPANIC	1
426	1	395	HW/PI	1	365	3	1	375	NON/HISPANIC	1
443	2	231	OTHER	1	374	3	1	376	NON/HISPANIC	1
444	10	421	OTHER	1	375	3	1	381	NON/HISPANIC	1

Rent Amount		Rent by Race			Rent by Bed Size			Rent Amount by Ethnicity		
Gross Rent	Count	Gross Rent	RACE	Count	Gross Rent	Bed Size	Count	Gross Rent	Ethnicity	Count
452	1	444	OTHER	2	381	3	1	382	NON/HISPANIC	1
466	1	100	WHITE	1	382	3	1	386	NON/HISPANIC	1
479	1	170	WHITE	1	386	3	1	389	NON/HISPANIC	6
483	1	185	WHITE	1	387	3	1	391	NON/HISPANIC	1
487	3	209	WHITE	1	389	3	1	392	NON/HISPANIC	1
496	1	224	WHITE	2	391	3	1	395	NON/HISPANIC	2
497	1	225	WHITE	2	395	3	1	396	NON/HISPANIC	1
671	1	238	WHITE	1	396	3	1	399	NON/HISPANIC	1
Total	214	241	WHITE	1	404	3	1	404	NON/HISPANIC	1
		245	WHITE	1	421	3	18	413	NON/HISPANIC	1
		287	WHITE	1	426	3	1	421	NON/HISPANIC	15
		303	WHITE	1	444	3	9	426	NON/HISPANIC	1
		335	WHITE	1	452	3	1	443	NON/HISPANIC	1
		347	WHITE	1	483	3	1	444	NON/HISPANIC	6
		350	WHITE	4	496	3	1	452	NON/HISPANIC	1
		371	WHITE	2	497	3	1	479	NON/HISPANIC	1
		387	WHITE	1	100	4	1	483	NON/HISPANIC	1
		389	WHITE	3	225	4	1	487	NON/HISPANIC	2
		395	WHITE	1	227	4	1	496	NON/HISPANIC	1
		421	WHITE	3	247	4	1	671	NON/HISPANIC	1
		443	WHITE	1	289	4	1	Total		214
		444	WHITE	3	316	4	1			
		466	WHITE	1	318	4	1			
		487	WHITE	1	324	4	1			
		497	WHITE	1	362	4	1			
		Total		214	376	4	1			
					389	4	1			
					395	4	2			
					443	4	2			
					444	4	1			
					466	4	1			
					479	4	1			
					487	4	3			
					287	5	1			
				Total			214			

In Year 3, as noted above, this Activity will be implemented at three (3) more Orlando Housing Authority (OHA) operated public housing sites: Lake Mann Homes, Marden Meadows Apartments, and Omega Apartments. With the addition of these three (3) sites, all of the Authority's public housing communities, excluding those designated as elderly or elderly/disabled sites will be covered under the Moving to Work (MTW) self-sufficiency rent floor. As previously noted, as of January 1, 2013, twenty-four (24) residents of Lake Mann Homes, Marden Meadows Apartments and Omega Apartments cannot meet the minimum rent floor and will be referred to the MTW Resource Center in April 2013. All new admissions to public housing will be subject to the rent floor. In addition, beginning April 1, 2013, all new admissions to the Housing Choice Voucher/Section 8 voucher program will also be subject to the rent floor.

MTW Activity 2: Streamline the recertification process in the public housing and voucher programs

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 3 Expectation</u>
Recertify elderly/disabled residents of all public housing sites and all elderly/disabled Section 8 voucher program participants every three years, with annual adjustments for fixed-income program cost of living increases	All initial Three (3) Year Recertification completed by 3/31/12	Recertifications are completed for all elderly/disabled public housing residents and for voucher program participants during the Initial 15-Month Demonstration Period (1/7/11 to 3/31/12).
		Year 2 (4/1/12 - 3/31/13) annual cost of adjustments for fixed income recipients only.
		Year 3 (4/1/13 - 3/31/14) annual cost of adjustments for fixed income recipients only.* * Full recertification process for clients in certain zip codes will begin in 11/13 and 12/13 with effective dates of 2/14 and 3/14. All public housing residents and Section 8 program participants will have full recertifications completed by 3/14.
	By Year 4 (4//14 -3/31/15) and in Year 7 (4/1/17- 3/31/18), full recertifications will be completed for all elderly and disabled public housing and Section 8 voucher program participants	

The ongoing implementation of Activity 2, in coordination with the implementation of MTW Activity 3 and MTW Activity 4 should allow the OHA to meet its goal of reducing staff minutes spent on rent calculations and recertifications with elderly and disabled adults by 50% in Year 2 and Year 3 of the Demonstration.

803030
MTW Activity 3: Streamline the Rent Calculation Process

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 3 Expectation</u>
Disregard first \$25,000 in asset incomes	Initial MTW Demonstration Period ending 3/31/12	Implemented 2/1/11 for public housing, 4/1/11 for Section 8
Modify written third-party verification process except on a limited audit basis (5%)	Initial MTW Demonstration Period ending 3/31/12	<p>Completed; the third party verification policy/process was modified based on recommendations of the Agency's MTW Working Group composed of Executive and Senior Management staff responsible for implementation of the MTW Program.</p> <p>These modifications were initially implemented during the Initial 15-Month Demonstration Period will be continued to be applied in Year 3 (4/1/13 -3/31/14).</p>
Define acceptable means of verification	Initial MTW Demonstration Period ending 3/31/12	<p>Completed.</p> <p>Staff will continue to use the employment verification form, allowing residents/clients/applicants to bring in the completed form rather than requiring that the form to be mailed to the Administrative Office Staff will call the employer to verify information contained in the completed form.</p> <p>In lieu of written third-party verifications, households can also submit official documentation of income (such as pay stubs). PH Residents/ Section 8 clients/applicants will be allowed to submit official documentation of unearned income, irregular and other forms income, assets, deductions and exemptions.</p> <p>If there is any in doubt regarding the authenticity/veracity of any of information provided by the resident/ client/applicant, staff will use the traditional established third-party verification protocol for confirmation purposes. OHA staff will continue to use information obtained through the Enterprise Income Verification System (EIV) to verify and monitor income.</p>

During Year 3, data collection activities will be expanded to include capturing the amount of time spent on third-party verifications, rent calculations, and annual recertifications of all non-elderly and /non disabled households at all public housing communities operated by the Authority, as well as continuing data collection for elderly and disabled public housing residents and Section 8 voucher program participants.

MTW³¹³¹³¹ Activity 4: Consolidate inspection and recertification requirements

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 3 Expectation</u>
<p>Develop a plan for conducting consolidated recertifications and inspections of all public housing residents and Section 8 clients based on geographic location.</p> <p>Develop a protocol for modifying HQS to include a rating standard (without losing eligibility for Capital Fund bonus for PHAS high performers)</p>	<p>Consolidated recertification and inspections plan was implemented beginning in August 2012 using the standard HQS protocol for PH and Section 8 units</p> <p>January/February 2013</p>	<p>Completed</p> <p>Hire a consultant to develop a modified HQS protocol/inspection form incorporating a rating system equivalent to that contained in the updated UPCS protocol authorized in the new PHAS Regulation for submission to HUD for review and approval</p>
<p>Use inspection and recertification schedules for both programs based on geographic location, rather than date of initial receipt of assistance</p>	<p>Implement a fully integrated inspections and recertification process using a unified recertification/inspection team approach (using modified HQS protocol, if approved by HUD) beginning Nov. /Dec. 2012.</p>	<p>This Activity will be implemented using current HQS Protocol/ Inspection Form for both public housing and Section 8 units until HUD approves the use of the modified HQS inspection protocol/forms.</p>

⁸²³²³²**MTW Activity 5: Provide Interim Voucher Assistance and Related Counseling to Prevent Foreclosure**

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 3 Expectation</u>
Amend the Section 8 Housing Choice Voucher Administrative Plan to include allocation of fifty interim vouchers (six months) for Foreclosure Prevention Program	May 20, 2011	Completed
Meet with local government housing staff to discuss MTW Foreclosure Prevention Program, procedures and guidelines	March 2010	Completed
Contact other HUD Certified Counseling Agencies for possible participation in the MTW Foreclosure Prevention Program	August 10, 2011 October 2011 - April 2012	Completed
Establish criteria for selection of Interim HCV recipients	May 15, 2012	Completed
Establish procedures and guidelines for implementation, monitoring and counseling for Foreclosure Prevention Program	June 1, 2012	Completed
Develop standard forms to assist in implementation (referral forms, HCV forms)	June 30, 2012	Completed
Commence offering vouchers	Jan./Feb. 2013	<p>The implementation phase of this Activity is scheduled to commence Jan./Feb.2013.</p> <p>During the remaining three months of Year 2 (4/1/12 to 3/31/13), the OHA anticipates that it will provide interim voucher assistance to up to five (5) households' case managed by two certified housing counseling agencies.</p> <p>In Year 3 (4/1/13 to 3/31/14), the OHA estimates that it will assistance at least 10 additional households.</p>

The Orlando Housing Authority (OHA) will begin the implementation phase of the program Jan./Feb. 2013. During the remaining three months of Year 2 ending 3/31/13, the OHA expects to provide interim voucher assistance to five (5) households case managed by two certified housing counseling agencies. In Year 3, the OHA anticipates that the number of partner agencies will increase as program develops and stabilizes and that at least ten (10) additional households will receive interim voucher assistance, preventing loss of their homes from foreclosure.

MTW³³³³³³ Activity 6: “Partner with the Wayne Densch Center, Inc. and other OHA-approved housing support services agencies to provide transitional housing units with supportive services at the West Oaks Apartments for formerly homeless households and households in imminent danger of becoming homeless, who are under case management, using up to 50, floating project-based Section 8 vouchers.”

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 3 Expectation</u>
Arrange for subordination of current lien to provide for public housing Declaration of Trust in first position to allow for the placement of ACC authority for 50 floating public housing units at West Oaks.	1/31/12	OHA has provided the loan servicer, Wells Fargo, requested information regarding its plans for West Oaks. Wells Fargo procured Velocity Consulting to perform a physical needs assessment, which was completed in November 2011.
Negotiate with the Bond Holder, Fannie Mae and Wells Fargo for placement of ACC authority and Declaration of Trust in first position.	3/31/12	Fannie Mae stated they will not approve the placement of ACC units at West Oaks due to loan subordination. As an alternative, OHA decided that it would request HUD approval of a waiver of regulations to project-base, up to 50 floating Section 8 vouchers at West Oaks.
Submit a request to the HUD MTW Office for approval to Amend OHA’s MTW Year 2 Plan to secure necessary waivers of regulations to Project-Base 50 Section 8 Vouchers at West Oaks.	6/8/12	Request to amend OHA’s MTW Plan for Year 2 submitted to the HUD MTW Office.
Secure HUD approval to Project-Base 50 Section 8 Vouchers at West Oaks.	8/20/12	HUD approval of MTW Plan amendment secured.
Execute MOU with service provider , specifying responsibilities of OHA and the service provider(s)	8/23/12	MOU with the Wayne Densch Center to provide ongoing case management, counseling and other services executed
Implement MOU with the Wayne Densch Center to provide screening, referral, case management & other support services for up to 50 homeless households.	3/31/13 Year 3 (4/1/13 to 3/31/14)	House at least five (5) homeless households referred by the Wayne Densch Center by 3/31/13 House up to 20 households referred by Wayne Densch or other OHA-approved housing support service agencies

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MTW Activity 7: “Use project-based vouchers and other resources to develop City-donated property for low-income elderly housing.”

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 3 Expectation</u>
Meet with City of Orlando to determine if land and funding is available for the redevelopment of Jackson Court/ Division Oaks.	By: 3/31/13	In discussions with City of Orlando regarding possible options, including a partnership with Carver Theater Developers. See notes below:
Execute agreement with the City of Orlando on the disposition of Jackson Court.	TBD	
Architectural Planning Development/Financing Planning Closing Commit 45 Project-Based Vouchers (PBV) Construction period Begin occupancy	All of these dates are to be determined	

The OHA will continue to explore alternative for redevelopment of Jackson Court/Division Oaks during the remainder of Year 2. If the Carver Park Theater Developers are unable to obtain financing for construction by March 31, 2013, the OHA will renew its efforts to secure an alternative site and financing mechanism for the proposed redevelopment during Year 3.

Section VI-C: Proposed Modifications to Attachment C Authorizations required by Plan Activities.

OHA is not requesting any changes to be made to Attachment C/D authorizations for ongoing MTW activities in FY14.

Section VI.-D: Describe if the agency is using outside evaluators

As stated in our application to HUD for designation as a Moving to Work (MTW) Agency and in initial and subsequent approved MTW Annual Plans, the Orlando Housing Authority is partnering with the University of Central Florida (UCF) to have the Department of Sociology staff conduct annual, external objective evaluations of the Authority's planned MTW activities and uses of funds throughout the duration of the Authority's MTW Agreement with HUD ending in 2018. The cost, scope and complexity of the annual evaluations will increase over time as program initiatives become fully implemented.

The Orlando Housing Authority (OHA) has executed a Memorandum of Agreement (MOA) with University of Florida (UCF) for the Evaluation of Moving to Work (MTW) Activities 1 through 6 and Use of Funds Action A and Action B, which are listed in Section VI.-A. The MOA will be updated/renewed annually, at the start of each subsequent project period, incorporating any revisions to the MTW Annual Plan.

The University of Central Florida's (UCF) Department of Sociology, Institute for Social and Behavioral Sciences will conduct an evaluation of the OHA's Year 2 MTW Activities and Use of Funds between March and May 2013. The reviewers will evaluate the following:

- Statistical analysis and comparison of annual data collected on program costs, expenditures, processes, structure, outcomes, other areas (MTW Activities 1-6) and MTW Activity 7, if implemented during Year 2;
- An online survey of staff to measure the implementation of Moving to Work and its effect on staff;
- In-depth, face-to-face interviews with clients receiving self-sufficiency support services of the MTW Service Resource Center to evaluate the following: (1) MTW Use of Funds A: "Establish a One-Stop Comprehensive Self-Sufficiency Resource Center" and (2) impact on clients being served through MTW Activity 6: "Provide transitional housing with supportive services for formerly homeless households in case management;"and
- Face-to-face interviews of clients served through MTW Activity 5: "Provide interim voucher assistance and related counseling to households threatened with foreclosure."

The Memorandum of Agreement (MOA) with the University of Central Florida (UCF) for Year 2 stipulates that UCF will complete its evaluation and submit a report of findings, along with recommendations for changes in programming to the Orlando Housing Authority (OHA) on or before June 7, 2013. The report will contain an overall assessment of progress made by the Authority in meeting established program benchmarks for six (6) of the seven approved MTW Program Activities and MTW Use of Funds Actions A and B during Year 2. The evaluation will also contain an assessment of impact program changes have had on public housing residents and MTW Resource Center program participants.

The Orlando Housing Authority (OHA) will review the findings of the University of Central Florida's (UCF) Evaluation Report and incorporate the recommendations contained in the report into the Program Plan for Year 3 with three months of receipt. The Memorandum of Agreement (MOA) with the UCF for Year 3 will focus on assessing the OHA's overall progress in meeting program benchmarks to date, will compare Year 3 outcomes with prior year results, and will include a reassessment of program metrics, baselines, and baselines and a review of data collection, tracking and reporting protocols.

SECTION VII. SOURCES AND USES OF FUNDING

A. Planned Sources and Uses of MTW Funds

CONSOLIDATED SOURCES AND USES OF MTW FUNDS (FISCAL YEAR 2014)		
REVENUE (SOURCES)		
PH Operating Subsidy and Rent	\$ 8,482,717	
Public Housing Capital Fund Program	\$ 2,306,483	
Housing Choice Vouchers (not special purpose)	\$23,952,968	
TOTAL REVENUE (available for MTW)		\$34,742,168
EXPENSE (USES)		
General Administration/Maintenance	\$12,263,207	
Public Housing Capital Expenditure	\$ 1,482,906	
Housing Assistance Payments	\$19,980,455	
MTW Resource Center (maximum amount; specific uses are enumerated below)	\$ 760,000	
Foreclosure Prevention Initiative MTW Activity 5 (up to 50 vouchers) Estimated at up to 15 vouchers to serve up to 50 households)	\$ 114,000	
Project-Based vouchers for homeless families in Case Management Initiative MTW Activity 6 (up to 50 vouchers) Estimated at 20 vouchers at \$590 per month)	\$ 141,600	\$34,742,168
NET INCOME/LOSS		\$0

The above revenue and expense statement is based on the CY 2012 funding level. All vouchers issued to relocated former Sanford Housing Authority (SHA) clients and SHA vouchers formerly administered by the SHA are included in the OHA's projected FY 2014 budget.

B. Planned Sources and Uses of State/Local Funds

The OHA does not receive or administer state or local funds.

C. Planned Sources and Uses of Central Office Cost Center (COCC)

The OHA will continue to use cost allocation method to allocate COCC revenue and expenses to various programs/projects.

D. Alternative Cost Allocation or Fee for Service Methodology

As stated in Section VI.-C. above, the OHA uses the standard HUD cost allocation method for Central Office costs and has done so consistently since 2008. The OHA does not use an alternative cost allocation or fee for service methodology.

E. ³⁸³⁸³⁸Use of Single-Fund Flexibility

Use of Funds “A” designates funding to establish and operate a comprehensive One Stop Self-Sufficiency Resource Center that provides and/or facilitates access to a range of self-sufficiency services for OHA MTW residents. The Resource Center provides needs assessments, case management, employability counseling, and other supportive services, including, but not limited to referral of program participants for employment interviews and job placement resources.

The assessment of OHA MTW residents has revealed that in addition to job training and employment opportunities, there is a need for child care and transportation services. The Resource Center assisted in the establishment of a child care facility at the Reeves Terrace public housing complex, that offers non-traditional service hours, i.e. evenings, nights and weekends.

In order to address other services that OHA residents need, other partnership opportunities are under discussion as follows:

- To provide a second child care center, also offering nontraditional care hours at Ivey lane Homes public housing complexes.
- Expansion of the local transit authority, LYNX, bus routes, to provide more efficient routes to local job centers and to increase the number of buses that run during the peak hours to reduce crowding on buses that serve OHA MTW public housing communities.
- To provide secondary education, job readiness training and other programs that will help MTW residents assess their education and training and develop a successful career path.

Uses of Funds “B” designates funding to continue the “Greening of the Orlando Housing Authority”. Funds will be used for energy conservation to help reduce utility expenses and making improvements at public housing communities that contribute to a healthier living environment for residents. So far, testing of air quality of public housing units has been completed, with planned activities for design improvements to the housing to address the issues identified from the tests.

Use of Funds “C” designates funding for an evaluator to closely track and evaluate OHA’s performance in meeting its MTW activity benchmarks and goals. The University of Central Florida is OHA’s partner in evaluating its Moving to Work program. Each year UCF will evaluate OHA’s MTW Program Activities and Uses of Funds annually, with the cost, scope and complexity of the evaluations increasing over time as OHA full implements its program initiatives.

Section VI-F. (Optional) List of Reserve Balances at the Beginning of the Plan Year.

OHA will begin using its Reserve balance to support OHA programs and mitigate the impacts of sequestration and the resulting reduction in funding to the agency.

Section VI-G. (Optional) In the Plan Appendix, provide Sources and Uses by AMP.

Not provided.

PROPOSED RESOLUTION NO.: 3396

AUTHORIZES SUBMISSION OF THE ANNUAL MOVING TO WORK YEAR 3 PLAN TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT COVERING THE PERIOD FROM APRIL 1, 2013 THROUGH MARCH 31, 2014

WHEREAS, the Orlando Housing Authority mission is "To offer a choice of safe and affordable housing options and opportunities for economic independence for residents of Orlando and Orange County," and

WHEREAS, the Orlando Housing Authority (OHA) has prepared its annual Moving to Work (MTW) Plan for Year 3 for the period from April 1, 2013 to March 31, 2014, and

WHEREAS, the Year 3 Plan will continue to implement the Moving to Work Activities and Uses of Funds, and

WHEREAS, the Orlando Housing Authority published a notice indicating the following:

1. The Plan and all information relevant to the public hearing was available for public inspection from October 2, 2012 through November 1, 2012 for at least 30-days,
2. A Public Hearing would be held November 1, 2012 to discuss the proposed Year 3 MTW Plan,
3. There would be no less than 15-days between the Public Hearing and the approval of the MTW Year 3 Plan by the Board of Commissioners, and

WHEREAS, the Orlando Housing Authority Board of Commissioners conducted a Public Hearing November 1, 2012 to discuss the Plan and invited the public to comment; and

WHEREAS, the Orlando Housing Authority Board of Commissioners considered the public's comments before approving the Year 3 MTW Plan, and

WHEREAS, the Orlando Housing Authority Board of Commissioners approves the annual MTW Plan for Year 3 which is incorporated in the Resolution by reference.

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of the Housing Authority of the City of Orlando, Florida authorizes the submission the annual Moving to Work Year 3 Plan to the U.S. Department of Housing and Urban Development covering the period from April 1, 2013 through March 31, 2014 and authorizes the President/CEO to execute all necessary agreements and to make changes that are not substantial.


VIVIAN BRYANT
PRESIDENT/CEO


ED CARSON
CHAIR

December 6, 2012
DATE

Section VIII B: ⁴⁰⁴⁰⁴⁰ **Description of any planned or ongoing Agency-directed evaluations of the demonstration, if applicable**

As discussed in detail in our response to Section VI.-D, the OHA is partnering with the University of Central Florida (UCF) to have UCF Department of Sociology staff conduct annual, external objective evaluations of the Authority's planned Moving To Work (MTW) activities and uses of funds throughout the duration of the Authority's MTW Agreement with HUD ending in 2018.