Cora McCorvey, Executive Director/Chief Executive Officer

FY2015 MOVING TO WORK PLAN

Resubmitted to HUD on January 30, 2015

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MINNEAPOLIS PUBLIC HOUSING AUTHORITY

The mission of Minneapolis Public Housing Authority (MPHA) is to promote and deliver quality, well managed homes to a diverse, low income population and, with partners, contribute to the well-being of the individuals, families and community we serve.

FY2015 MOVING TO WORK

ANNUAL PLAN

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SECTION I: INTRODUCTION

Short and Long-Term MTW Goals and Objectives

Short Term MTW Goals and Objectives

Minneapolis Public Housing Authority (MPHA) is one among a small percentage of "Moving to Work" (MTW) public housing authorities in the nation. MTW allows public housing authorities to exercise flexibility over how and where their funding from HUD will be spent. It also permits MPHA to waive various rules and regulations in order make choices about how programs and services are delivered enabling the Agency to respond to specific affordable housing needs in our community. MTW does not increase federal appropriations, but it does allow public housing authorities greater control in deciding how to use them. With the Agency facing funding shortages, which are expected to continue far into the foreseeable future, MPHA's MTW designation provides a powerful tool that can be used to support its mission.

MPHA's short term MTW goals can be encapsulated in using its MTW authority and flexibility to identify strategies that will be implemented in 2015 consistent with its overall MTW Plan. With the overall goal of supporting MPHA's efforts to continue serving as many families as we can by providing safe, affordable and decent housing opportunities in the wake of on-going reductions in federal and local funding, and addressing the continuing and burdensome and bureaucratic demands made on our programs.

In 2015, MPHA will develop and implement a strategy for acquiring property, securing capital funding and begin developing new units of public housing through utilizing its Faircloth ACC authority. MPHA's 2015 MTW initiative related to moving families with children out of homeless shelters is the outcome envisioned for these short term goals.

Under its Section 8 HCV Rent Reform, MPHA has eliminated both the Transition Waiver and Rent Caps that were in place for the first year of the Rent Reform initiative.

MPHA is moving its Alternate Income Verification to the 'Not Yet Implemented' category for MTW activities. MPHA is hopeful as it opens its new acute assisted living – memory care program at its Signe Burkhardt development, to utilize this initiative for quickly processing vulnerable persons for housing in the program. If this initiative proves to be necessary for this process, MPHA will move it back into the 'Implemented' portion of the plan and identify this action in the 2015 MTW Report.

MPHA expects to phase out the Earned Income Disregard Simplification (HCV) program in 2015 as this program was is being phased out under its 2014 Rent Reform initiative except for persons already receiving the benefit. These persons will exhaust their two year eligibility in 2015, and MPHA will move the activity to Closed Out in its 2016 MTW Plan.

The Agency's Targeted Project Based Initiative is expected to be completed in 2015 when all vouchers are project based and families are housed in the developments. These developments will then become part of MPHA's regular PBV program and monitored under those requirements and the activity will be closed out in MPHA's 2016 MTW Plan.

The Absence from Unit Initiative targeted for both the Agency's public housing and Section 8 HCV program was not implemented in the Section 8 program and given the limits on rent recertifications under the Section 8 HCV rent reform, MPHA has decided to close out this initiative for the Section 8 program but will continue it for public housing.

While MPHA has used its MTW authority to increase the minimum rent to $75 dollars per month, the Agency is holding off the allowed additional increases to $100 due to strong resident feedback that such increases create an undue hardship for those very low income families who do not have additional sources of income. MPHA will continue to evaluate this on a year to year basis.

MPHA's Lease To Own Initiative is struggling to fulfill the opportunities imagined with the development of this program. The agency will continue to seek success for this program in 2015 but also begin considering alternative strategies for this initiative.

The Foreclosure Stabilization Program has met its goals related to the unique partnership between MPHA and Project for Pride in Living (PPL) that combined MPHA project based resources with ARRA and Federal NSP dollars to not only refurbish foreclosed properties, but also provide long terms stability and affordable housing options to very low-income families. MPHA won a NAHRO National Award of Merit for this program. MPHA will decide with its partner PPL if this program should remain active in MTW or move to the regular PBV program for ongoing oversight. While the specific MTW goals have been met, the ongoing look at the stabilizing effect of this creative use of funds on neighborhoods should continue to be monitored.

MPHA will expand it options under the Housing Choice Voucher Mobility program to permit the initial use of the HCV Mobility vouchers to be expanded to the seven county metropolitan area but still limited to non-concentrated areas. Currently, participants had to find mobility options within the City of Minneapolis.

MPHA and Hennepin County are changing the name of what was named the MPHA-Hennepin County Transitional Housing Demonstration Initiative to the MPHA-Hennepin County Interim Housing Demonstration Initiative to better reflect the purpose of the short term and focused support

provided under the program. This initiative is being moved from the Not Yet Implemented category to the Implemented category as it has housed it first two participants and will continue to be operational into the foreseeable future.

MPHA will aggressively pursue the conversion of the 200 public housing units that are part of the mixed income development in Heritage Park through HUD's Voluntary Conversion program, including utilizing MTW authority as needed to address the limitations on project basing more than 25% of the units in a development and other areas that may need regulatory relief as MPHA goes through this process. MPHA will move this initiative from the Not Yet Implemented to the Implemented category if HUD approves the Agency's Voluntary Conversion Plan in 2015.

Finally, in 2015, MPHA will be closing out its biennial MTW Section 8 HCV Inspection protocol from the MTW Plan. Section 220 of the 2014 Congressional Appropriations Act "allows public housing authorities to inspect assisted dwelling units during the term of a HAP Contract by inspecting such units not less than biennially instead of annually". HUD's published implementation notice for changes mandated by the 2014 Appropriations Act was effective July 1, 2014. Though MPHA will continue its biennial inspections process, we propose closing itout as an on-going MTW Initiative.

In 2015, MPHA will also engage in a continuous and ongoing review of its Asset Management Program portfolio and identify old, antiquated and unproductive properties that may be disposed of, refurbished and/or converted into small cluster developments, mixed financed communities and/or other income producing resources that support the Agency's overall affordable housing programs. This may include utilizing RAD, Voluntary Conversion, Bonding, Low Income Housing Tax credits, New Markets Tax Credits, Historic Tax Credits and/or other sources of funds and supports. This includes a comprehensive review of MPHA's 184 unit Glendale family townhome development and various scattered site housing units.

In undertaking redevelopment activities, MPHA may need to establish limited liability corporations/ partnerships in order to qualify for certain funding opportunities.

MPHA will also consider disposition of any vacant lots or parcels of land that are not tied directly to housing of tenants that could be sold, traded for other development opportunities and/or converted to some other purpose that benefits the Agency.

MPHA will consider partnering with other agencies, organizations, units of government to fully utilize its Faircloth ACC authority to expand and/or create additional affordable housing in our community and or specific housing and housing with services opportunities for families with children who are homeless and in shelter.

MPHA was given authorization under its MTW Agreement to implement local non-traditional activities. MPHA will explore and, as opportunities present themselves, partner and/or engage in activities that will position MPHA to contribute to affordable housing needs in the community.

MPHA will follow guidance given by PIH Notice 2011-45 to implement any activity. MPHA understands that prior to taking advantage of the opportunities it will be required to have HUD review and have prior approval to implementation of the activity.

Long Term MTW Goals and Objectives

MPHA will continue to use the Strategic Plan adopted by the MPHA Board of Commissioners in 2012 to reflect its long term MTW Goals. MPHA is committed to responding proactively and strategically in determining its priorities and actions, including when and how to exert its MTW flexibility. MPHA's decision to take the more 'proactive' approach is not new. Since 1991, when it became an independent agency, MPHA has boldly taken calculated risks, engaged the community, and structured its decisions and actions to take maximum advantage of available opportunities to better serve its residents and program participants as well as contribute to the critical housing needs of some of the most vulnerable in our community.

The Mission of the Minneapolis Public Housing Authority is to promote and deliver quality, well-managed homes to a diverse low-income population and, with partners, contribute to the well-being of the individuals, families and community we serve.

MPHA's long term vision integrates the mission and values of the Agency, the seven strategic directions adopted as part of its recently approved Strategic Plan with MTW flexibility to best position MPHA to address the challenges and seize the opportunities it will face during the next five years.

Strategic Direction 1

MPHA's highest priority is to preserve its viable housing portfolio so it remains a resource for affordable, safe, and high quality housing for its residents.

- *Goal 1: Conduct physical needs assessments that provide the basis for capital improvements planning and implementation on a regular and reasonable basis.*
- *Goal 2: Provide maintenance and capital improvements to ensure a consistent livability standard that meets or exceeds HUD's Uniform Physical Condition Standards (UPCS).*
- *Goal 3: Implement sustainable strategies and technologies when carrying out capital and maintenance activities and agency operations.*
- *Goal 4: Take advantage of opportunities to maintain Public Housing subsidies and pursue other opportunities that contribute to the preservation of existing viable sites.*

- *Goal 5: Develop evaluation criteria, including housing program needs, cost effectiveness, and long-term sustainability measures, to consider when determining which properties should be retained and which should be eliminated from MPHA's portfolio.*
- *Goal 6: Investigate opportunities to reposition single family homes into more cost effective and operationally efficient housing inventory.*
- *Goal 7: Conduct a comprehensive assessment of security needs and practices with the goal of contributing to a safe and secure environment in a cost effective manner.*

Strategic Direction 2

MPHA will maximize effective use of its Section 8 Housing Choice Voucher Authority and have as a priority to maintain its baseline number of Tenant-Based vouchers and respond to additional critical Minneapolis community affordable housing needs by assessing revenue streams, resource implications, and opportunity costs as it allocates its vouchers.

- *Goal 1: MPHA's priority will be to affect a balanced approach aimed at housing families from the agency's current wait list by maintaining and, where possible, expanding its allocation of Tenant-Based Vouchers and creating partnerships in order to make the most effective use of its limited Project Based Authority.*
- *Goal 2: When allocating Project Based Vouchers, MPHA will adopt strategies that will promote affordable housing to families with specifically identified needs, promote service enriched housing, leverage increases in the supply of affordable housing, and foster operational stability for affordable housing development.*
- *Goal 3: When awarding Project Based to potential partners, MPHA will develop and implement evaluation criteria that will include the partner's willingness to cover MPHA's costs above those that would be provided by HUD for Tenant- Based vouchers.*
- *Goal 4: Create policies that position the agency to respond to natural disasters and other emergencies as determined by the MPHA Board of Commissioners.*

Strategic Direction 3

MPHA will seek partnerships with the goal of enhancing services, promoting health and wellness, contributing to safety and supporting residents and participants in their efforts to live independent lives.

- *Goal 1: Promote opportunities, in cooperation with its partners, for residents to age in place and receive services and supports that will allow residents to have quality lives.*
- *Goal 2: Sustain its Senior Housing Designation Plan, which creates and sustains senior communities within MPHA public housing developments and, offers choices for seniors regarding housing location and assisted living programs.*

- *Goal 3: Encourage and support resident involvement and participation in agency activities that impact residents and their homes. MPHA will work with established resident council and representation systems to support this goal.*
- *Goal 4: Provide through its partnerships education, training and employment opportunities for residents and participants seeking to become economically self-sufficient.*
- *Goal 5: Coordinate with the City of Minneapolis, Hennepin County and other partners to identify and implement specific strategies that promote health and wellness opportunities for residents and participants, including making MPHA smoke-free within the next five years.*

Strategic Direction 4

MPHA will continue to participate and communicate with HUD, the State of Minnesota, the Metropolitan Council, Hennepin County, and the City of Minneapolis to contribute to the development of housing policy and housing policy implementation as well as to ensure that the affordable housing needs of Minneapolis residents and the agency's capacity and ability to address these needs will be considered when housing-related decisions are being made.

- *Goal 1: Continue to interact with other units of government to contribute to the development of housing policies, rules, and regulations.*
- *Goal 2: Interact with local jurisdictions to create a local housing policy agenda, contribute to the housing elements of local plans, address immediate housing issues, develop emergency response strategies, and encourage a cooperative approach to implementing housing policy and services.*
- *Goal 3: Strategically communicate MPHA's successes, initiatives and capabilities to local leaders, businesses, and stakeholders and partners in order to increase awareness of MPHA's capabilities and contributions.*

Strategic Direction 5

MPHA will use its resources in an efficient and accountable manner, in compliance with all laws and regulations, and will seek to maintain an adequate financial reserve to ensure the long term viability of the agency and protect it from unanticipated costs and the consequences of fluctuating federal appropriations.

- *Goal 1: MPHA will look for ways to streamline its operations in order to realize financial efficiencies and economies of scale.*
- *Goal 2: MPHA will maintain an adequate financial reserve to safeguard the agency against unanticipated costs and widely varying federal appropriations.*

- *Goal 3: MPHA recognizing the importance of operating with transparency, accountability and integrity, will meet all financial reporting, audit and expense eligibility requirements to the satisfaction of granting agencies and other financing partners.*
- *Goal 4: Conduct business and financial functions with a focus on best practices and integrity.*

Strategic Direction 6

MPHA will update and strengthen its operational policies and practices to ensure: a) that all staff can perform their duties at the highest levels of competency and b) the long-term viability of the agency, including cultivating and attracting the next generation of leadership.

- *Goal 1: Provide staff training that benefits both the employee and the agency to ensure staff is abreast of and responsive to current trends.*
- *Goal 2: Provide diversity training for staff to improve communications with an increasingly diverse base of customers.*
- *Goal 3: Provide regular opportunities for staff to reflect on their goals and accomplishments.*
- *Goal 4: Design and implement management succession strategies that, at a minimum, include cultivating. Retaining, and attracting the next generation of leadership.*
- *Goal 5: Recruit and retain a diverse and talented workforce.*

Strategic Direction 7

MPHA will continue its commitment to promote participation in its operations by women, minority and Section 3 residents and Businesses as well as other Small and Underutilized Business Program (SUBP) participants.

- *Goal 1: Recruit and hire qualified women, minority and Section 3 residents as part of a commitment to promote participation in its operations and comply with appropriate Section 3 requirements.*
- *Goal 2: Conduct procurement activities in compliance with Section 3 requirements and to promote MPHA goals related to participation of women and minority enterprises in agency business activities.*
- *Goal 3: Create a MPHA Job Bank that provides a list of Section 3 eligible residents, job interest categories and contact information that can be provided to firms doing business with MPHA.*
- *Goal 4: Identify and engage with organizations that provide education, training and support for employment related to the kinds of work performed by firms doing business with MPHA and refer residents to these organizations.*

SECTION II: GENERAL HOUSING AUTHORITY OPERATING INFORMATION

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

Attachment B

(II) General Housing Authority Operating Information

Annual MTW Plan

II.1.Plan.HousingStock

A. MTW Plan: Housing Stock Information

Planned New Public Housing Units to be Added During the Fiscal Year

AMP Name and Number	Bedroom Size							Total Units	Population Type *	Fully Accessible	Adaptable
	0	1	2	3	4	5	6+				
PIC Dev. # MN002000002/AMP2 PIC Dev. Name Scattered Site	0	0	3	5	2	0	0	10	Other *	2	1
Total Public Housing Units to be Added									10		

* **Select Population Type from:** Elderly, Disabled, General, Elderly/Disabled, Other

If Other, please describe: Family

Planned Public Housing Units to be Removed During the Fiscal Year		
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
PIC Dev. #MN002000002 2/AMP PIC Dev. Name Scattered Site PIC Dev. Name Scattered Site	3	High cost of maintenance and operation, obsolete and aging systems infrastructure, buildings located in areas of concentrated poverty.
Total Number of Units to be Removed	3	

New Housing Choice Vouchers to be Project-Based During the Fiscal Year		
Property Name	**Anticipated Number of New Vouchers to be Project-Based ***	**Description of Project**
Lonoke - Portico	4	The project is located at 1926 3rd Avenue South and will be an historic rehabilitation of a 19 unit apartment building. The Lonoke will be a mixed income rental building providing permanent supportive housing to 10 individuals who have been part of the service housing program for chronically homeless adults. The Lonoke will have four (4) project based vouchers for homeless single adults with disabilities.
Emerson North Family Housing - Portico	10	The project is located at 1808 Emerson Avenue North, Minneapolis. It will consist of 48 new construction units of affordable family housing of which 10 units will be Project Based Section 8 Housing Choice Voucher units. Emerson North Family Housing will be a mixed income development with 10 units receiving MPHA Project Based Assistance (25 % of the units) and 34 of the units with incomes affordable to households at or below 50% of Area Median Income (75% of the units). The Project Based Assistance units will provide permanent supportive housing for Long Term Homeless Families with Services provided by Families Moving Forward (FMF). The Non- Project Based Assistance units will be leased to working families making around $20,000 - $40,000 a year (affordable between 40% and 50% area median income).
South Quarter - Phase IV - AEON	15	The project will encompass an entire city block, or approximately 2.3 acres. It will add 90 new mixed-income, high performance homes; transition Aeon's existing 30 unit Pine Cliff Apartments (7 PBV units) into an operationally efficient and energy-wise property; and add approximately 12,000 square feet for Aeon's new office headquarters. South Quarter IV will be a truly economically integrated development, providing market rate and affordable apartment homes for a variety of household sizes, economic levels and lifestyles. South Quarter-Phase IV has formally been named 'The Rose'. The Rose will provide 43 market rate units; 47 units will be leased to very low and low-income families, 12 of these units are designated for formerly homeless families; of these, 15

will be assigned Project Based Vouchers. The market rate units will have a strong appeal for reasons related to proximity to downtown, easily available transit options, on-site parking, and project amenities that will include a fitness room and outdoor common areas in an urban community. The affordable component will cater to individual families earning between 30%, 50%, and 60% of the area median income (AMI).

Anticipated Total New Vouchers to be Project-Based	29	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	722
		Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year	722

*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.

Other Changes to the Housing Stock Anticipated During the Fiscal Year

75 MTW Public Housing Units will be held off-line each month in 2015 due to substantial rehab.

MPHA will seek funding for developing new single family units to replace units that have been approved for disposition and/ or units that are being considered for disposition. The newly developed housing will be Energy Star certified and preferably in clusters of approximately four or more units depending on land availability. These units will have 3-4 bedrooms each and one of the units will comply with Section 504 of the Fair Housing Act. MPHA will submit a development application to HUD when suitable land and funding has been identified for development. MPHA understands that regulations call for 5% of units to be handicapped accessible and an additional 2% for sight or hearing impaired.

MPHA is also considering creating additional senior housing and possibly a development initiative to create housing for very large families who currently are at risk of homelessness due to a lack of such housing in the city. MPHA understands that prior to moving forward with this specific proposal, the agency will take appropriate action to amend the MTW Plan and secure needed HUD approvals and will follow development regulations found at 24 CFR 941. If successful in securing suitable land and sufficient funds for development opportunities described above, MPHA intends to dispose of a number of single family units from its AMP2. These units will be disposed as part of MPHA's asset management plan to replace units that are difficult to rent and that have high operating, maintenance and capital needs with newly built units in clusters that are more efficient and cost effective to maintain and operate. An application for disposal of these units will be submitted to HUD at the appropriate time. HUD has published the final CFP rule and the agency will comply with the CFP rule requirements.

Under its MTW Agreement with HUD, MPHA is authorized to convert 112 units of its mixed financed public housing units to project based Section 8. However, this conversion is only valid through the demonstration and is not a permanent authorization. In addition, HUD is continuing funding for these units as public housing units as it has not provided additional funding for the conversion. These units will not be removed from the public housing inventory until HUD would authorize a permanent conversion and provide MPHA with additional voucher resources to support the costs related to project basing of these units. MPHA included conversion of an additional 200 public housing mixed finance units in its 2011 MTW Plan and is negotiating with HUD regarding additional voucher resources for this initiative. If HUD approves and provides additional voucher resources, these units will also be removed from the MPHA's public housing inventory. MPHA completed paperwork for submission of a voluntary conversion application for the 200 Heritage Park units to HUD and secured Board approval for a technical amendment to MPHA's 2014 MTW Plan. MPHA submitted the application to HUD and the Amendment to the MTW office.

MPHA is exploring the possibility of RAD or voluntary conversion of its 184 unit townhome development at Glendale. If a determination is made to move forward, MPHA will follow the process as outlined in HUD's guidance.

Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.

General Description of All Planned Capital Fund Expenditures During the Plan Year

The Minneapolis Public Housing Authority (MPHA) is applying for a $8 million CFP allocation for 2015. Further, projects that were initiated under previous funding cycles, but not fully completed in prior years, will carry over and incur expenditures in 2015. Additionally, a portion of the projects slated for 2014's $8 million budget will not be fully expended in 2015 and will carry into 2016. This expenditure schedule is based on the assumption of receiving the Capital Fund grant at the end of July 2015. MPHA has estimated approximately $14.46 million in capital expenditures for FY 15 targeted at specific projects in all of its seven Asset Management Projects (AMPs). Included in the $14.46 million Capital Funds expenditures are roofs and infrastructure upgrades for AMP 2 our scattered site developments. Major plumbing replacement, elevators, facade restorations, roof replacement, sprinkler system installation, security improvements, and apartment upgrades in our highrise developments focusing on AMPs 3,4,5, 6, and 7. Details of this activity can be seen in Exhibit A. In performing its capital work, MPHA adheres to Federal, State and Local codes and regulatory processes.

II.2.Plan.Leasing

B. MTW Plan: Leasing Information

Planned Number of Households Served at the End of the Fiscal Year

MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/ Leased***
Federal MTW Public Housing Units to be Leased	6,120	73,440
Federal MTW Voucher (HCV) Units to be Utilized	4,407	52,884
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	20	240
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0
Total Households Projected to be Served	10,547	126,564

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

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

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

Reporting Compliance with Statutory MTW Requirements

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

Minneapolis Public Housing Authority is in compliance with MTW Statutory Requirements and thus no reporting is necessary.

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

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Public Housing	Public housing units in North Minneapolis are difficult to lease due to neighborhood crime and high foreclosure rates in North Minneapolis which results in many non-MPHA units being vacant in the neighborhood. Applicants do not want to live in a neighborhood with many vacant units. MPHA is partnering with the Northside Achievement Zone (NAZ) which is a collaboration of organizations and schools helping families in a geographic "Zone" of North Minneapolis to prepare children to graduate from high school ready for college. Families and children move through a "cradle-to-career" pipeline that provides comprehensive support from pre-natal through college to career. Families who agree to move into the NAZ area are allowed to apply even though the waiting list is closed, with the requirement that they accept a unit in the "zone". There are 59 scattered site units in the NAZ. MPHA has studio (efficiency) units located throughout Minneapolis, depending on the actual size and the location, which can be also difficult to rent. MPHA is trying new strategies at three buildings with especially hard to lease units where by all new move-ins are housing in efficiencies and when a one bedroom opens up in that building, it is filled by the resident who has been living in an efficiency the longest. MPHA has used this strategy for less than a year and has yet to determined whether it is successful. We also have one location (1710 Plymouth) where for the past 10+ years, MPHA has secured

	permission from HUD to engage in permissible deductions to annual income such that residents pay 20% of their adjusted gross income for rent for these specific units. MPHA recognizes that the units off line will delay a number of highrise families from being taken from the waiting list but it does not impact lease up issues for the Agency.
Public Housing Rent-To-Own	MPHA has struggled to identify families who meet the rigorous screening criteria of work history, minimum income and an ability to demonstrate credit sufficient to obtain financing within 5 years. MPHA is working with its housing consultant to provide additional counseling and support as we consider families for this program.
Section 8/HCV	In 2014, MPHA began offering a limited number of vouchers to waitlist applicants who qualified for a Non-Elderly Disabled voucher or who qualified to participate in the Mobility program. Families at times have experienced difficulty finding units due to the very low vacancy rate and the limited supply of affordable units. MPHA's rent reform initiative will allow greater flexibility for families use of resources to assist with lease up. MPHA does not anticipate any leasing issues to occur with its non-traditional housing program with Alliance, MPHA's 'Soft Subsidy Initiative'.

II.3.Plan.WaitList

C. MTW Plan: Wait List Information

Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Public Housing Units - Highrise	Community-Wide	4,818	Partially Open *	N/A
Federal MTW Public Housing Units - Family	Community-Wide	5,653	Partially Open **	N/A

Federal MTW Public Housing Rent-To-Own	Site Based	0	Open *** Given the difficulty in finding qualified candidates, only one (1) family had been on a list in 2013; who moved into a unit in 2014. Since approved applicants are immediately offered an available unit, there are not qualified applicants on a waiting list.	List will remain open until all units are filled and reopen for vacancies
Federal MTW Housing Choice Voucher Program	Community-Wide	8,799	Closed	No
Project Based Local	Program Specific	1,422	Open for Program Specific Referrals	Yes

* *Select Housing Program*: Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

** *Select Wait List Types*: Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

*** For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

* Open for Public Housing elderly, disabled and near-elderly
** Partially Open (third Wednesday of every month) for families eligible for 3, 4, and 5 bedroom units
*** Open for eligible MTW working families meeting minimum income guidelines and demonstrated capacity to purchase within a 5-year period.

If Local, Non-Traditional Housing Program, please describe:

N/A
N/A
N/A

If Other Wait List Type, please describe:

N/A
N/A
N/A

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

N/A

SECTION III: PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

MPHA recognizes the unique status of the relationship between MPHA, the owners and managers of the 312 Mixed Income Developments throughout the Minneapolis Metropolitan Area and public housing residents living in assisted properties neither owned or managed by MPHA. Because of the impacts that specific MTW initiatives could have on owners and families who manage and live in properties that MPHA neither owns or manages, and the fact that each of these developments where the public housing is governed by a specific Regulatory and Operating (R & O) Agreement, all MTW initiatives approved under the waivers to the Public Housing Low Rent program will not be applicable to those developments unless both MPHA and the Owners agree.

FY2015 ACTIVITY 1: Shelter to Housing Initiative

A. Description of Activity:

Minneapolis and Hennepin County are seven years into the ten-year plan to end homelessness. Partner Agencies are working to meet specific housing goals of creating 5,000 housing opportunities. While the partnerships have exceeded the goals for housing opportunities for single adults, we are far behind on our development of units for families. The community has developed less than half of the goal for family housing opportunities, leaving a deficit of over 700 units. Family emergency shelters in Hennepin County have been operating over capacity since April 2011. In 2013 alone, 1,946 families sought refuge in the shelter system. Developing rental housing for extremely low-income families (30%-and below Area Median Income) has become incredibly challenging for a variety of reasons and developers have been unable to successfully build these units. It is imperative that we take every opportunity to increase brick and mortar housing for extremely low income families.

MTW Authorizations:

Attachment C -Bbii: Single Fund Budget with Full Flexibility. Acquisition, new construction, reconstruction or substantial rehabilitation.

Attachment C-B2: Partnerships with For-Profit and Non-Profit Entities. This authorization waives certain provisional Sections 13 and 35 of 1937 Act and 24CFR 941 Subpart F as necessary to implement the Agency's MTW Plan.

Attachment C-C2: Local Preference and Admission and Continued Occupancy Policies and Procedures. This authorization waives certain provisions of Section 3 of the 1937 Act and 24 CFR 960.206 as necessary to implement the Agency's Annual MTW Plan.

Attachment C-C11: Rent Policies and Term Limits. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 C FR 5.603, 5.611, 5.628, 5.630, 5.632, 5.634 and 960-.255 and 966 Subpart A as necessary to implement the Agency's MTW Plan.

Statutory Objectives:
This program will feature the MTW Statutory Objective of Increasing Housing Choices as it will focus on creating an avenue for very low income families in homeless shelters to move into a specialize public housing with services development.

Under HUD's Faircloth limit, Minneapolis Public Housing Authority (MPHA) has the authority to operate 112 additional public housing units over its current stock receiving additional subsidy to support families to be housed in these units.

MPHA will use it Moving To Work (MTW) authority along with Faircloth ACC to create a specialized housing program for families coming out of Homeless Shelters and to limit the time families can utilize this housing for no more than five years to ensure that these developments will turn over and become an on-going resource for homeless families. MPHA MTW authority is necessary to limit the occupancy for units being developed under the initiative to families coming out of shelter and referrals exclusively by Hennepin County. In addition, (Attachment C-C2) the five year limitation on housing for these families also requires use of MTW waivers (Attachment C-C11).

B. Anticipated Impacts:

MPHA anticipates that this program will create 30 to 50 units in the first five years of the program and begin to bring relief to families who are stuck in shelter to due lack of other affordable housing and in doing will also free up shelter space for other families relegated to be housed in overcrowded, unsafe and/or unhealthy situations. Families targeted for the program will receive ongoing services from Hennepin County and/or their services partners.

C. Anticipated Schedule:

MPHA will anticipates that, if this program is approved, it will use 2015 to acquire properties, secure needed capital funds and develop the first affordable units under the program. It is MPHA's goal to develop these units in clusters of small town home units 4 – 7 units per development. During 2015, while units are being capitalized and developed, MPHA will work with Hennepin County and its contracted service providers to develop a services MOU that can be individualized into plans that support the needs of individual families (Attachment C-B2).

Example - MPHA's Linden Hills Development

E, F, and G. Baseline and Benchmarks

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved**
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). Families coming out of homeless shelters.	0 - No housing units of this type existed prior to implementation.	TBD	TBD	TBD

HC #5: Increase in Resident Mobility				
Unit of Measurement	**Baseline**	**Yearly Benchmark**	**Outcome**	**Benchmark Achieved**
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity.	0	25	TBD	TBD

HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase housing choice (increase).	0 No households receiving this type of service prior to implementation.	TBD	TBD	TBD

SS #3: Increase in Positive Outcomes in Employment Status				
Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Report the following information separately for each category: (1) Employed Full- Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	TBD	TBD	TBD	TBD

	TBD	TBD	TBD	TBD

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving TANF assistance (decrease).	TBD	TBD	TBD	TBD

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase self sufficiency (increase).	TBD	TBD	TBD	TBD

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	TBD	TBD	TBD	TBD

SECTION IV: APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

IMPLEMENTED ACTIVITIES

FY2014 ACTIVITY 1: HCV RENT REFORM INITIATIVE

A. Description of Activity (Approved and Implemented in 2014)

In early 2012, MPHA began evaluating options for streamlining and simplifying the rental subsidy determination and recertification processes while also promoting self-sufficiency for HCV participants. This activity was implemented in January 2014. The initial goal of rent reform was to control costs and eventually achieve savings that would allow us to move families from our waitlist. However, with the advent of sequestration the focus shifted to maintaining assistance for all current families within a severely decreased budget. The following are the proposed elements of MPHA's revised HCV rent reform initiative.

1. **Flat Subsidy:** MPHA replaced the standard rent calculation method, regulated by 24 CFR 982.503 and 982.518, with a simplified, flat subsidy model which incorporates consideration for tenant paid utilities. MPHA will determine the subsidy paid to the owner on behalf of the family by using a flat subsidy amount based on household income and bedroom size. In instances where the applicable subsidy is greater than the contract rent, MPHA will cap the subsidy at the contract rent amount, minus the minimum rent of $75.

   MPHA will establish, annually review, and periodically update two flat subsidy tables. One table is used when the owner

MTW Authorizations:
Attachment C–D1 c. The Agency is authorized to define, adopt and implement a re-examination program that differs from the re-examination program currently mandated in the 1937 Act and its implementing regulations.
Regulations waived: 982.516

Attachment C-D1.g The Agency is authorized to establish its own portability policies with other MTW and non-MTW housing authorities.
Regulations waived: 982 Subpart H

Attachment C–D2 a. The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements.
Regulations waived: 982.503, 982.508, 982.518

Attachment C–D2 c. The Agency is authorized to develop a local process to determine reasonable rent that differs from the currently mandated program requirements.
Regulations waived: 982.507

Attachment C–D3 b. The Agency is authorized to adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility that differ from the currently mandated program requirements.
Regulations waived: 982.516, 982 Subpart E
Other regulations waived: 24 CFR 5.520(c)(2)

Statutory Objectives:
- Reduce cost and achieve greater cost effectiveness in Federal expenditures
- Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

provides heat as part of the rent. The other table is used when the household is responsible for paying heat and includes an adjustment based on average heat costs. Under the flat subsidy model, utility allowance payments are eliminated.

2. **Minimum Rent:** As part of the flat subsidy model, MPHA revised the application of minimum rent policies, regulated by 24 CFR 5.630 and discontinued its MTW Activity 2010-2 for the Housing Choice Voucher program. When establishing and updating the flat subsidy tables, MPHA will structure the minimum rent, which is currently $75, into the tables. If a participant's calculated rent amount is less than the minimum rent amount, the participant shall pay the minimum rent to the owner. MPHA has the discretion to revise the minimum rent. If MPHA would like to revise the minimum rent, the revision would be included in an MTW Plan submission to HUD for review and approval prior to implementation. As of January 1, 2015, all Project Based units are exempt from a minimum rent requirement.

3. **40% Affordability Cap:** MPHA eliminated the 40% affordability cap, regulated by 24 CFR 982.508, because under rent reform affordability becomes the responsibility of the family. We will not approve a Request for Tenancy Approval (RFTA) if a participant's rent portion exceeds 50% of their monthly adjusted income without supervisory review and approval.

4. **Revised Asset Income Calculation and Verification Policies:** MPHA revised existing policies on asset verification and calculation, regulated by 24 CFR 982.516. When the market value of a family's asset(s) is below the established asset threshold, initially set at $50,000, MPHA will exclude income from these assets. When the total asset market value is greater than the established threshold, MPHA will calculate asset income by multiplying the asset's market value by the applicable passbook savings rate. MPHA will allow HCV households to self-certify assets in all instances when the market value of the household's total assets is below the established threshold. At the time of implementation, MPHA will determine the passbook savings rate consistent with HUD requirements.

5. **Interim Re-examinations:** MPHA will make the following changes to the interim re-examination policy, regulated by 24 CFR 982.516:
    a. MPHA will limit HCV families to one discretionary interim re-examination between regular annual recertifications.
    b. Between annual recertifications, household members who are employed will not be required to report increases in earned income.
    c. For household members who are not employed, if they become employed that must be reported. Additionally, increases in or new sources of unearned income for any household member and changes in household composition must still be reported.

6. **Working Family Incentive and Streamlined Deductions and Exclusions:** As part of MPHA's revisions to the standard rent calculation method, MPHA will streamline deductions and exclusions as outlined below.

    a. **Working Family Incentive:** To lessen the impact of removing the childcare and dependent deductions, MPHA will continue to administer the Working Family Incentive, which is a 15% exclusion of earned income for families with minor children.
    b. **Elimination of Earned Income Disregard (EID):** MPHA will phase out the MTW EID initiative. Participants who currently receive the EID will be exempt from this policy for the duration of their EID term; however, no additional EIDs will be granted. Accordingly, MTW

Activity 2012-2 will phase out when all current participants' EID terms expire.

c. **Eliminate Childcare, Medical Expense and Dependent Deductions:** MPHA will eliminate childcare, medical expenses, and dependent deductions when calculating adjusted income.
d. **Elderly/Disabled Deduction:** To offset the impact of removing medical expense deductions, MPHA will increase the standard elderly/disabled deduction from $400 to $750.
e. **Full-time Student Income:** MPHA will exclude 100% of income for adult, full-time students, other than the head of household, co-head or spouse.

7. **Changes in Fair Market Rents (FMRs):** MPHA will review HUD's Fair Market Rents annually and may conduct a research and market analysis on local rents in updating the subsidy tables.

   MPHA will waive the requirement, outlined in 24 CFR 982.507, that the agency conduct reasonable rent determinations on all HCV units when there is a 5% decrease in the FMR in effect 60 days before the contract anniversary as compared with the FMR in effect one year before the contract anniversary. MPHA will continue to conduct reasonable rent determinations at the time of initial lease-up, at the time of owner rent increases, and at all other times deemed appropriate by MPHA.

8. **Flat Subsidy Reasonable Accommodation:** As a reasonable accommodation for individuals with qualifying disabilities, MPHA may provide a higher subsidy for accessible units. When an accessible unit is needed for an individual with disabilities and the rent is reasonable, MPHA may increase the subsidy by 10% of the flat subsidy amount.

9. **Portability:** MPHA revised the portability policies, regulated by 24 CFR 982 Subpart H. Participants will be approved to port-out of Minneapolis only for reasons related to employment, education, safety, medical/disability, VAWA, or housing affordability. Housing affordability means the family wishes to port to a jurisdiction in which the FMR is at least 5% less than the FMR in Minneapolis and the family's rent portion is greater than 40% of their monthly adjusted family income. Families who are denied portability have the right to request an informal hearing.

10. **Mixed Families:** For families with mixed immigration status, MPHA will deduct 10% from the flat subsidy amount. This 10% deduction is a flat deduction from the subsidy amount, regardless of the number of ineligible family members in the household.

B. Statutory Objectives

Reduce cost and achieve greater cost effectiveness in Federal expenditures: this rent reform model will help MPHA to more efficiently use Federal resources, protect current participant families from being removed from the program due to funding cuts, and subsequently may allow MPHA to serve more families.

Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient: this activity's incorporation of the Working Family Incentive will promote increased employment among participants who are not currently working and increased earnings among participants who are working.

C. Anticipated Impacts

With the simplification of rent calculations and the limit on interim re-examinations, this rent reform initiative will reduce the administrative burden involved in processing annual and interim re-examinations and reduce the rate of errors in calculating adjusted income and rent. The staff time saved through this initiative will allow MPHA to increase the focus upon program integrity, by monitoring zero income families and ensuring that both participants and owners are in compliance with program rules. Additionally, staff will have more time to focus upon tenant education. This education may include self-sufficiency activities, understanding lease agreements, expanding housing search, connecting to community resources, and exploring educational opportunities.

MPHA projects that this activity will promote self-sufficiency for participants by limiting the extent to which increases in income will result in corresponding rent increases. Also, the change to income reporting requirements will allow employed family members to keep any increase in their earnings, rather than contributing a portion to their rent, until the time of their annual recertification. These projected impacts will be greater when full implementation of rent reform is complete.

D. Anticipated Schedule/Changes

Rent reform was implemented January 1, 2014 for all participants. Achievement of the MTW Statutory Objectives is an ongoing and ever-changing process, of which the Rent Reform initiative is a pivotal part.

Effective January 1, 2015, MPHA will exempt all its Project Base developments from the Rent Reform initiative and from the Agency's MTW Minimum Rent requirements. Many of these developments receive funding from other sources including SHP, HOPWA, and HOME. These and other funding sources often require that all units in the development have rents restricted to 30% of adjusted income and thus, MTW initiatives may cause these developments to be out of compliance with their other funding sources.

-E, F, and G. Baseline and Benchmarks

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Yearly Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (budget for Section 8 HCV program – expenses)	2013 budgeted expenses of $44,451,999	2014 expenses will decrease 9.65%, to $40,162,621		

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Yearly Benchmark**	**Outcome**	**Benchmark Achieved?**
Length of time required to complete annual recertification or lease-up	4.5 hours, including all associated tasks (scheduling/rescheduling, interviewing, data gathering and verification, determination of affordability, negotiation of rents, rent reasonableness, rent calculation, and execution of HAP contract) 5,599 annual recertifications and lease-ups were conducted in 2012, equating to 25,195.5 hours of staff time	30 minutes will be saved through the elimination of verification for medical and child care deductions and the simplified rent calculation using the flat subsidy tables 2,799.5 hours of staff time will be saved Time saved will be dedicated to program integrity and tenant education activities		
Length of time required to complete interim re-examination	2 hours, including all associated tasks 2,766 interims were conducted in 2012, equating to 5,532 hours of staff time 210 of the 2,766 interims were tenant-requested for households who had already requested an interim within the year, equating to 420 hours of staff time	15 minutes will be saved through the administrative efficiencies gained under rent reform 210 less interims will be conducted due to the limit of one tenant-requested interim 1,059 total hours of staff time will be saved		

Length of time required to re-do rent reasonableness for all units if FMRs decrease by 5%	30 minutes per unit, or 2,289.5 hours of staff time	100% decrease in time required to re-do rent reasonableness, or 2,289.5 hours saved		
TOTAL	33,017 Hours of Staff Time	6,148 Hours Saved		

CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	**Baseline**	**Yearly Benchmark**	**Outcome**	**Benchmark Achieved?**
Average error rate in calculating adjusted income as a percentage	12.6% error rate in adjusted income calculation	9% error rate in adjusted income calculation		

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Yearly Benchmark**	**Outcome**	**Benchmark Achieved?**
Average income from employment	$17,495	Earned income will increase 2%, to $17,846		

SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	**Baseline**	**Yearly Benchmark**	**Outcome**	**Benchmark Achieved?**
6. Other – with earned income	1,504 heads of households had earned income	1,552 heads of households will have earned income		
	58% of work-able households had a head of household with earned income	Work-able households with a head of household with earned income will increase 2%, to 60%		

SS #4: Households Removed from Temporary Assistance to Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Yearly Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving TANF assistance	2,418 receiving TANF	2,418 will be receiving TANF		

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline**	**Yearly Benchmark**	**Outcome**	**Benchmark Achieved?**
Average per unit cost	$730	Per unit cost will decrease 8%, to $672		

SS #8: Households Transitioned to Self-Sufficiency				
Unit of Measurement	**Baseline**	**Yearly Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self-sufficiency as measured by number of households going off program for having $0 HAP subsidy amount - they are self-sufficient because they are paying the full contract rent	14	25		

I. Data Sources

MPHA will use our software to monitor the impacts of this activity on household rent and tenant income. Additionally, MPHA may use other methods of assessing the effectiveness of these activities at meeting the stated objectives. MPHA may not implement these data collection methods until the activity is fully implemented.

J. MTW Authorizations

Attachment C–D1 c. The Agency is authorized to define, adopt and implement a re-examination program that differs from the re-examination program currently mandated in the 1937 Act and its implementing regulations. Regulations waived: 982.516.

Attachment C-D1.g The Agency is authorized to establish its own portability policies with other MTW and non-MTW housing authorities. Regulations waived: 982 Subpart H.

Attachment C–D2 a. The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements. Regulations waived: 982.503, 982.508, 982.518.

Attachment C–D2 c. The Agency is authorized to develop a local process to determine reasonable rent that differs from the currently mandated program requirements. Regulations waived: 982.507.

Attachment C–D3 b. The Agency is authorized to adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility that differ from the currently mandated program requirements.
Regulations waived: 982.516, 982 Subpart E. Other regulations waived: 24 CFR 5.520(c)(2).

K. Need for Cited Authorizations

The cited authorizations are needed in order to identify the regulations that MPHA will modify or waive under the Rent Reform Initiative.

L.. Rent Reform

1. **Board Approval:** The MPHA Board of Commissioners approved this policy as part of the resolution adopting the 2014 MTW Annual Plan.

2. **Impact Analysis:** In developing this initiative, MPHA conducted and presented to its Board a thorough analysis on the potential impacts of this activity on HCV households. The effects of these policies will differ between families. MPHA created hardship policies, as described below, for qualifying families who are adversely affected by the implementation of the initiative.

3. **Annual Reevaluation:** MPHA will reevaluate this activity on an annual basis to ensure that it continues to meet its objectives. As needed, MPHA may revise components of this activity to meet the objectives. The results of the annual reevaluation will be included in subsequent MTW Annual Plans & Reports.

4. **Hardship Case Criteria:** MPHA has established hardship policies related to rent reform, including a Hardship Review Committee, comprised of HCV staff, which will review all hardship requests. Details on each hardship policy are outlined below.

    a. **Limit on Interim Re-examinations Waiver**

MPHA will advise families who request a second interim re-examination between regular reexaminations that they can request a waiver of the Limit on Interim Re-examinations policy.

A hardship exists when any of the following apply:

i. The family has lost eligibility for or is awaiting an eligibility determination for a Federal, State, or local assistance program
ii. The income of the family has decreased because of a significant change in circumstance, including loss of employment
iii. The death of a family member has occurred affecting a major source of income for the family

b. Minimum Rent Hardship

MPHA will advise families who are paying minimum rent that they can request a hardship exemption from paying minimum rent. To qualify for a hardship exemption, a family must submit the Minimum Rent Hardship Request Form, with supporting documentation as specified on the form, within 15 days of the date of the rent change notice. A hardship that lasts for 90 days or less is a temporary hardship and does not qualify for this exemption. An approved hardship exemption from paying minimum rent is limited to 12 months.

A hardship exists when any of the following apply:

i. The family has lost eligibility for or is awaiting an eligibility determination for a Federal, State, or local assistance program
ii. The income of the family has decreased because of a significant change in circumstance, including loss of employment
iii. The death of a family member has occurred affecting a major source of income for the family

The Hardship Review Committee will make a decision within 30 days of receiving the Minimum Rent Hardship Request Form and all supporting documentation. MPHA will suspend the Minimum Rent beginning the month following the approval of the request.

Prior to implementation, MPHA may continue to develop specific policies and procedures for hardship requests and may make future revisions to identify and assist families adversely impacted by these policies.

FY 2013 Activity 1: MPHA – Hennepin County Interim Housing Demonstration Initiative

Description of Activity (Approved in 2013 - Implemented in 2014)

MPHA is partnering with Hennepin County to create a 'Transitional Housing with Supportive Services' demonstration program to allow MPHA to utilize up to eight public housing units for low income individuals who are in need of transitional housing for brief periods from a few days to a few months. In PIC, MPHA will change the classification of these 8 units to MTW neighborhood services units.

These individuals are low income vulnerable persons who will be exiting the hospital, have no support system and need supportive services to avoid re-hospitalization and who without such services would remain in the hospital costing thousands of dollars which could be significantly mitigated under this initiative. Hennepin County refers participants to the program and provides MPHA with income verification data to ensure compliance with public housing eligibility criteria. Hennepin County will determine the length of stay based upon the health and support needs of the participants. No stay will exceed four months. Hennepin County will be responsible for identifying housing assistance once the participant completes their temporary stay.

MPHA will provide the housing units, perform work orders and maintain common areas Hennepin County would provide staffing and supportive services, house-keeping and other interventions as needed for participants. Hennepin County would provide a payment to MPHA for use of the housing units.

MTW Authorization:

This initiative invokes certain provisions of Attachment D 'Broader Uses of Funds authority;
Attachment C – B 2. Partnerships - This authorization waives certain provisions of Sections 13 and 35 of the 1937 Act and 24 CFR 941 Subpart F as necessary to implement the Agency's Annual MTW Plan. **Statutory Objective:**
Achieving greater cost effectiveness in federal expenditures. The MPHA partnership reduces significantly federal expenditures of Medicaid and Increases Housing Choice. Without this program most of these participants would remain hospitalized, become homeless and/or be forced to live in vulnerable conditions without supportive services.

Update

MPHA implemented this program on January 2, 2014. There have been 2 units occupied in this program thus far. Unfortunately, the need for this program has not met expectations. MPHA expects that as more Hennepin County hospital staff are aware of this program, the number of clients will increase.

Anticipated Impacts:

The anticipated impact of this proposal is that 20 – 35 extremely vulnerable persons who need transitional housing with services will be provided safe and decent temporary housing and supportive services that will lessen the likelihood of re-hospitalization save thousands of dollars in medical expenses. This number consists of the estimated number of persons who will occupy the eight units over a one year period.

Metrics, Baselines and Benchmarks

- **Baseline:**
  - This is a new program and there are no current participants
  - Hennepin County estimates that there are over 100 persons annually who could possibly benefit from this initiative.
  - Estimated Hennepin County hospital cost for 48 persons for ten day average = $288,000.

- **Benchmarks:**
  - This program will serve up to 48 persons in the first year of operation
    Estimated cost savings for 48 participants for ten day average including operational costs of demonstration = $110,000.
  - Receive higher than average rent for each of these eight units.

Data Collection & Metrics:

CE #5: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity - $24,000	Expected rental revenue after implementation of the activity - $51,360.		

HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase housing choice (increase).	0. This is a new program.	48 participants		

Activity 2012-2: Earned Income Disallowance Simplification (HCV Program)

Description of Activity (Approved and Implemented in 2012)

In the Housing Choice Voucher Program, Federal Regulations allow families whose head of households are disabled a full income disregard for one year and a 50% disregard for the second year. As families move in and out of employment, the disregard is postponed; the monitoring is time consuming and creates administrative hardships that are prone to errors. MPHA has created a full two-year income disregard for eligible families and eliminated the administrative hardship and time consuming monitoring.

Anticipated Changes

Current EID participants will continue to receive the income disregard until their two-year period ends at the close of calendar year 2015.

MTW Authorization:

This provision invokes certain provisions of Attachment C generally and including Section D 3 a, and b. and waives certain provision of Section 8(o)(4) of the 1937 Act and 24C.F.R. 5.603, 5.609, 5.611, 5.628 and 982.201, 516 and 982 Subpart E as necessary to implement the Agency's MTW Plan.

Statutory Objective:

As an MTW initiative this activity addresses the statutory objective of achieving greater cost effectiveness in federal expenditures.

Metrics, Baseline, and Benchmarks

Per HUD direction, for Metrics that MPHA had not included previously, MPHA has indicated 'To Be Determined' (TBD) in the required fields. Please note that this initiative is phased out and will be closed out in MPHA's 2016 MTW Plan. MPHA eliminated the Earned Income Disregard in implementing its Rent Reform program, but permitted current participants to complete their two-year eligibility under this initiative.

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	TBD	TBD		

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	TBD	TBD		

CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average error rate in completing a task as a percentage (decrease).	TBD	TBD		

CE #5: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Rental revenue in dollars (increase).	TBD	TBD		

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households affected by this policy in dollars (increase).	TBD	TBD		

SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	**Baseline**	**Yearly Benchmark**	**Outcome**	**Benchmark Achieved?**
6. Other – with earned income	23	10		

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving TANF assistance (decrease).	TBD	TBD		

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	TBD	TBD		

MPHA is not using outside evaluators for this activity. MPHA does not anticipate a need to employ additional authorizations to continue initiatives under this section. Benchmark has been revised to reflect the phasing out of EID.

FY 2011 – Activity 1 Targeted Project Base Initiative

Description (Approved in 2011 and phased in implementation with last two projects to be implemented in 2014.)

MTW Authorization: This provision waives certain provisions of Attachment C Section D 7 b 24C.F.R. 983.51; Section D 7 c; 24C.F.R. 983.57; and Section D 7 d. Section 8(o)(8) of the 1937 Act and 24C.F.R. 982 Subpart I

Statutory Objective:

Increases housing choices

The Targeted Project Based Initiative was approved in 2011. The first phase of implementation, project basing six (6) HCV vouchers and eleven (11) VASH vouchers at Emanuel Housing as well as five (5) HCV vouchers at Spirit on Lake, was completed in 2013. The next phase of implementation will involve project-basing fifteen (15) HCV vouchers at South Quarter Phase IV, four (4) HCV vouchers at The Lonoke, and ten (10) HCV vouchers at Emerson North Family Housing. The Subsidy Layering Reviews for South Quarter Phase IV and The Lonoke were submitted to MHFA and HUD for review and approval in July 2014. Emerson North Family Housing has yet to complete their Subsidy Layering Review. The 2014 MTW Plan stated that The Lonoke had withdrawn their request for vouchers, but that was an error, The Lonoke is still participating in this initiative.

The purpose of this initiative is to create additional affordable housing for low-income families in the City of Minneapolis. MPHA used the MTW waiver to expand the location of project-based voucher programs and to limit voucher awards relative to a proration impact that required creation of additional non-PBV affordable housing. These vouchers were awarded to programs and organizations that proposed developments where there is a high ratio of new affordable units to those subsidized through MPHA's project-based initiative.

Through this initiative, project-basing forty (40) HCV vouchers and eleven (11) VASH vouchers will leverage 264 unassisted units for a grand total of 315 units of new housing. MPHA has not allocated any funding for the development of the units; the monies MPHA allocated are for voucher assistance when a qualified participant is residing in the PBV unit.

Project	Project-Based Units	Unassisted Units	Total Units
Emanuel Housing	6 HCV 11 VASH	84	101
Spirit on Lake	5	41	46
South Quarter Phase IV	15	86	101
Emerson North Family Housing	10	38	48
The Lonoke	4	15	19
TOTAL	**51**	**264**	**315**

Update

Construction was completed, HAP contracts were signed for two projects and the units were fully occupied during 2013; Emanuel Housing and Spirit on Lake. The HAP contract for Emanuel was effective August 15, 2013. The six (6) Project Based units were fully occupied in September 2013. The HAP contract for Spirit on Lake was effective September 15, 2013. The five (5) Project Based units were fully occupied in September 2013. MPHA erroneously removed the Lonoke project that included four (4) PDV units in the 2014 plan and is reestablishing this project in the 2015 MTW Plan. This change increases the total PBV vouchers awarded to forty (40) and creates 315 new affordable housing units, which includes the PBV units. The Subsidy Layering Review (SLR) for Lonoke and South Quarter Phase IV were submitted to Minnesota Housing Finance Agency (MHFA) and HUD for review and approval in July of 2014.

MPHA's targeted project based initiative created a total of 315 units, which include the 40 PBV units. The total number of units without housing assistance that MPHA leveraged using the 40 project based vouchers is 275.

Metrics, Baselines and Benchmarks

CE #4: Increase in Resources Leveraged				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Amount of funds leveraged in dollars (increase).	MPHA anticipated a per unit cost for PBV units to be $330,000 TDC, for the 51 vouchers awarded the baseline development cost is $16.83 million.	MPHA required a 3 to 1 ratio of non-project-based units to project-based units, so the benchmark for leveraged development costs is $50.49 million.		

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	0. No housing units of this type existed prior to implementation.	51 project based voucher units and, using the 3 to 1 ratio, 153 additional affordable tax credit units.		

HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase housing choice (increase).	0. No households receiving this type of service prior to implementation.	160 households will be offered services in making an affordable housing choice.		

This metric is not applicable to the Targeted Project-Based Initiative because the projects are not required to provide services that increase housing choice.

These HUD Metrics will replace current metrics as they are inclusive of current metrics. MPHA is not using outside evaluators for this activity. MPHA does not anticipate a need to employ additional authorizations to continue initiatives under this section.

FY2011 - Activity 2: Soft Subsidy Initiative that Increases Housing and Promotes Self-Sufficiency

MTW Authorization:

The authorization utilizes the authority allowed in the amendment to Attachment D "broader uses of funds authorization" which HUD has approved.

Statutory Objective:

Self Sufficiency.

Description (Approved in 2011 and implemented in 2013)

MPHA entered into an agreement with Alliance Community Housing with set subsidies for special conditions that are also time limited and flexible in amount and duration (lasting up to five years). These subsidies are structured to incentivize work so that the household is better off financially if the parent works and not penalized if they work. While it is difficult for many parents to move to work and then to better-paying work, parents who do move to work show increasing self-esteem and pride, find their work a source of meaning and support, and an activity that instills structure which is good for their kids and introduces the family to a working (or middle class) life. Studies show that parents who work are good for their children: children from families where the parent works do better in school. This program will not involve reduction in the number of Section 8 Voucher but will be funded out of MTW flexible funds. MPHA will enter into an Agreement with Alliance Community Housing that will detail the terms and conditions of this initiative.

Alliance Community Housing provided high quality housing to 20 homeless or formerly homeless families in 2012. Most of these families are multi generationally poor, African American, single parents with little to no work history. Many have little education, poor rental history and some have criminal histories. The program's goal is to get the parents off government assistance and into the working class.

The subsidies provided under this initiative are structured to make work more attractive and less risky. The intensive staff contact provided through Alliance Community Housing with families helps them with logistical problems as well as questions and concerns that might lead them to give up if unaddressed.

Update

MPHA has made changes to this implemented activity in regards to the Statutory Objectives. The primary focus is self sufficiency as evidenced by our current metrics; therefore, we are removing the metric of expanding housing choice, which was erroneously placed in the plan. In 2013, MPHA executed the agreement with Alliance Community Housing for the Soft Subsidy Initiative. The intake process for families began in 2013; nineteen (19) families were active as of January 2014. It is expected that by the end of 2014 all 20 available spaces will be filled by active families.

Metrics, Baselines and Benchmarks

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average annual income for families over a five year period (increase).	0 prior to implementation.	Increase of household income $13,195.		

SS #3: Increase in Positive Outcomes in Employment Status				
Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of families with stable employment histories (increase) (1) Employed Full-Time - N/A (2) Employed Part-Time - N/A (3) Enrolled in an Educational Program - N/A (4) Enrolled in Job Training Program - N/A (5) Unemployed - N/A (6) Other: Percentage of Households with Earned Income	0% prior to implementation of activity.	15 families 75% after implementation of activity.		

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of families on TANF.	Fifteen	5 receiving TANF.		

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase self sufficiency (increase).	0 households receiving self-sufficiency services prior to implementation of activity.	Twenty households receiving self sufficiency services after implementation of the activity.		

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).		

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	0 households transitioned to self sufficiency .	2 expected households transitioned to self sufficiency.		

FY2011 – Activity 3: Absence from Unit Initiative (Amendment to the FY2011 Plan)

Description (Approved and implemented in 2011)

HUD approved the Absence from Unit Initiative as an amendment to MPHA's 2011 MTW Plan. This initiative disallows a rent reduction for residents who have a temporary loss of income related to an extended absence from the unit defined as 30 days or more. For example, a tenant may quit a job to be away from the unit or have their government benefits terminated because of travel outside of the country. This voluntary action would have resulted in a loss of income and consequently, a reduction in rent. MPHA believes such voluntary action should not result in increased Federal expenditures to support this family.

Update

The activity was fully implemented in the Public Housing program in June of 2011. MPHA has adopted policy changes and provided notice and communication to Public Housing residents regarding this initiative. MPHA has created a hardship exemption and will continue this initiative in 2015. MPHA continues to find that some residents are not reporting their absence from the unit since the rent will not be reduced and the MPHA lease limits the time a resident may be away from the unit to 90 days.

MTW Authorization:

MTW Amended and Restated Agreement – Attachment C [C11 – Authorizations related to public housing only – Rent Policies and Term Limits]. This authorization waives certain provisions of Sections 3, 6, 7, 16 and 31 of the 1937 Act and 24 C.F.R. 945 Subpart C, 960 Subparts B, D, E, and G as necessary to implement the Agency's Annual MTW Plan and [D2 – Authorizations related to Section 8 only – Rent Policies and Term Limits]. This authorization waives certain provisions of Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. § 982.508, §982.503 and §982.518 as necessary to implement the Agency's Annual MTW Plan.

Statutory Objective:

Reduce cost and achieve greater cost effectiveness in federal expenditures.

This activity was never implemented in the Section 8 HCV Program. Given the limitations on rent re-certifications in the Rent Reform, MPHA has evaluated this initiative and has determined it extraneous for its HCV Program.

Metrics, Baselines and Benchmarks

CE #5: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity - $11,250	Expected rental revenue after implementation of the activity - $30,000.		

MPHA has incorporated the applicable HUD standard metrics for this activity. MPHA is not using outside evaluators for this activity. MPHA does not anticipate a need to employ additional authorizations to continue initiatives under this section.

FY2010 – Activity 1: Public Housing Working Family Incentive

Description (Approved and implemented in 2011)

The MPHA Public Housing implemented a Working Family Incentive in an effort to increase the income and asset level of families with minor children in which any adult member is employed. For public housing the definition of family is expanded to include households that are exclusively adult. The rent calculation contains an automatic fifteen (15) percent deduction from the gross annual earned income of each wage earner in the family. This deduction provides the Working Family with available money to support work related costs, including but not limited to transportation, uniforms, and health insurance premiums.

MPHA believes this initiative promotes self-sufficiency. We expect to see an increase in income to those employed and provide a push to those unemployed, yet able to work, to seek employment. This initiative is automatically available to all public housing residents who work.

Update

MPHA has had mixed results with this initiative. During 2013, the average income of those employed increased, the number of households employed decreased. At the end of 2013, there were 1,349 public housing households with earned income, a decrease of 4% over 2012, while the average earned income of those households increased to $19,905. MPHA had no requests for hardship under this initiative in 2013.

For those families who continued work, this activity increased the Working Family's level of disposable income and enhanced the likelihood that the family would achieve a livable wage and move toward self-sufficiency.

Update

MPHA has added the MTW metrics as these metrics have not been used in a previous annual report and information isn't currently available, MPHA is tracking this in 2014 (the current fiscal year).

MTW Authorization:

MTW Amended and Restated Agreement – Attachment C [C11 – Authorizations related to public housing only - Rent Policies and Term Limits]; This authorization waives certain provisions of Sections 3, 6, 7, 16 and 31 of the 1937 Act and 24 CFR 945 Subpart C, 960 Subparts B, D, E and G as necessary to implement the Agency's Annual MTW Plan and [D2 – Authorizations related to Section 8 only – Rent Policies and Term Limits] This authorization waives certain provisions of Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 CFR 982.508, 982.503 and 982.518 as necessary to implement the Agency's Annual MTW Plan.

Statutory Objective:

Provide incentives to families to obtain employment and become economically self-sufficient.

There was a financial impact on the low-rent program for 2013 because the change in calculation results in changes to the amount of rent paid; due to a proration in subsidy, MPHA will experience a loss of revenue. MPHA will report on the 2014 impact in the 2014 MTW Report.

MPHA will continue this activity in 2015 for public housing residents. MPHA's Section 8 HCV program has incorporated its Working Family Incentive Activity into its comprehensive Rent Reform Initiative and information regarding this activity is located there.

MPHA is not using outside evaluators for this activity. MPHA does not anticipate a need to employ additional authorizations to continue initiatives under this section.

Metrics, Baselines and Benchmarks

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity $15,970.	Expected average earned income of households affected by this policy after implementation of the activity $18,000.		

SS #3: Increase in Positive Outcomes in Employment Status				
Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Report the following information separately for each category: (1) Employed Full- Time – **N/A** (2) Employed Part- Time – **N/A** (3) Enrolled in an Educational Program – **N/A** (4) Enrolled in Job Training Program – **N/A** (5) Unemployed – **N/A** **(6) Other: Households with Earned Income**	Households with earned income prior to implementation of the activity - 1,241	Households with earned income after implementation – 1,253		
	Percentage of households with earned income prior to implementation – 21%.	Percentage of households with earned income prior to implementation – 21%		

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity 546	Expected number of households receiving TANF after implementation of the activity 450		

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).		

SS #7: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity 14,437,400	Expected PHA rental revenue after implementation of the activity 18,000,000		

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency the number of families paying Flat Rate Rent prior to implementation of the activity 270.	Expected households transitioned to self sufficiency paying Flat Rate Rent after implementation of the activity 290		

MPHA will use the HUD Standard metrics above to replace the previous metrics. MPHA is not using outside evaluators for this activity. MPHA does not anticipate a need to employ additional authorizations to continue initiatives under this section.

FY2010 – Activity 2: Minimum Rent Initiative for Public Housing Residents

Description (Approved in 2010 and implemented in public housing in 2011)

Tenants moving into public housing will pay the minimum rent that is in effect at the time of lease up. This initiative would increase the minimum rent of existing public housing tenants at the first annual or interim re-exam following:

January 1, 2010	$75.00
January 1, 2014	$75.00
To Be Determined	$100.00
To Be Determined	$125.00
To Be Determined	$150.00

This would not apply to households in which all members are either elderly and/or disabled, and whose sole source of income is Social Security, SSI or other fixed annuity pensions or retirement plans. Those households would continue to pay 30% of their adjusted gross income.

MTW Authorization:

MTW Amended and Restated Agreement – Attachment C [C11 – Authorizations related to public housing only - Rent Policies and Term Limits]; This authorization waives certain provisions of Sections 3, 6, 7, 16 and 31 of the 1937 Act and 24 CFR 945 Subpart C, 960 Subparts B, D, E and G as necessary to implement the Agency's Annual MTW Plan and [D2 –

Statutory Objective:

Reduce cost and achieve greater cost effectiveness in federal expenditures.

Update

MPHA's Public Housing Low Rent Program implemented the minimum rent initiative in 2011 with the current minimum rent being $75 per month. MPHA is not currently considering an increase to the minimum rent. Resident feedback demonstrates that an increase would create undue hardship for many residents. MPHA will decide at a future date when to increase the minimum rent further. MPHA has determined that the increase in the minimum rent has not resulted in increased self-sufficiency and has deleted it from the Statutory Objectives. When MPHA decides to increase the minimum rent, residents will be notified and given the required period to comment. This will be done during the MTW Plan review.

MPHA continues its hardship exemption program in Low Rent Public Housing.

MPHA is not using outside evaluators for this activity. MPHA does not anticipate a need to employ additional authorizations to continue initiatives under this section.

MPHA's Section 8 HCV program has incorporated its Minimum rent Initiative into its 2014 comprehensive Rent Reform Initiative and information regarding this activity is located there.

Metrics, Baselines and Benchmarks

CE #5: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity - $221,400	Expected rental revenue after implementation of the activity - $600,000		

The benchmark was changed in 2015 to better reflect MPHA's experience, the previous benchmark was $325,800 and MPHA's result was more than double that amount.

The previous benchmark was developed before HUD informed MTW agencies that benchmarks should be identified annually. The $600,000 is MPHA's benchmark for 2015.

FY2010 – Activity 4: MPHA Rent-to-Own Initiative (Sumner Field Townhomes)

Description: (Approved in 2010 and phased in implementation 2012-2014).

MPHA utilized funds from its ARRA Formula Grant, to purchase twenty (20) townhome development units to create a Rent-to-Own Initiative where qualified public housing residents, Section 8 participants, families on both waiting lists as well as, MPHA and City of Minneapolis employees who qualify for public housing will have an opportunity to initially rent and subsequently purchase these units. This activity was initially referred to as 'The BrightKeys' after BrightKeys Development; however, the developments are legally named Sumner Field Townhomes.

Update

MPHA has seventeen (17) of its twenty (20) units under lease and expects to have all twenty units under lease in 2015. All new Rent-to-Own tenants are required to participate in MPHA's MTW savings match program and must work with the agency's Lease To Own staff to develop a specific plan to purchase their unit within the five-year timeframe called for in the MPHA's MTW Rent-To-Own initiative.

Should vacancies arise due to tenant inability to meet Rent-To-Own requirements, MPHA will open its site-based waiting list in order to market to new Rent-To-Own families. MPHA will continue this initiative until all units are purchased by participating families.

MTW Authorization:

MTW Amended and Restated Agreement – Attachment C [C1 – Site Based Waiting List; C7 a and b – Simplification of the Development and Redevelopment Process for Public Housing . . . "establish reasonable low-income homeownership programs such as lease-to-own . . ."This authorization waives certain provisions of Section 6(r) of the 1937 Act and 24CFR 903.7 and certain provisions of Section 6(c) of the 1937 Act and 24 CFR 960.201 as necessary to implement the Agency's Annual MTW Plan

Statutory Objective:

Provide incentives to families to obtain and keep employment and become economically self-sufficient and increase housing choices.

Metrics, Baselines and Benchmarks

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households affected by this policy in dollars (increase).	Average household income for participants$25,500	2% increase in earned income. Total$26,210 2013 Actual: $38,445 2014 Benchmark: 2% increase of 2013 actual.		

This benchmark changed to reflect the actual from the previous year and set a new 2% increase as this is MPHA's annual benchmark goal.

SS #2: Increase in Household Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of savings/escrow of households affected by this policy in dollars (increase).	No households currently participating - $0.	Average amount of annual savings/escrow $15,600.		

This benchmark changed to reflect the average savings/escrow achieved from the prior year and including the expected additional savings escrow for 2015.

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self sufficiency (increase). MPHA has defined self-sufficiency as income sufficient to purchase home.	0 households have incomes sufficient to purchase at time of move in.	Three households will achieve self-sufficiency (income sufficient to purchase home) within one year.		

HC #5: Increase in Resident Mobility				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	TBD	TBD		

MPHA believes this metric is not applicable as the goal of the initiative is for the resident to purchase the unit in which they live.

HC #6: Increase in Homeownership Opportunities				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households that purchased a home as a result of the activity (increase).	0 households have incomes sufficient to purchase at time of move in.	One household will purchase home in one year.		

HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase housing choice (increase).	TBD	TBD		

MPHA is not using outside evaluators for this activity. MPHA does not anticipate a need to employ additional authorizations to continue initiatives under this section.

FY2010 – Activity 5: Foreclosure Stabilization Project Based Voucher Demonstration Program

Description of Activity (Approved in 2010 and phased in implementation through 2012).

The Foreclosure Stabilization Initiative allows MPHA to expand and increase housing choices and secure operational stability for a program developed by Project for Pride in Living (PPL) to purchase, rehab and rent out units that had been subject to foreclosure.

Applicants for participation in this program will be recommended by PPL pursuant to the funding requirements under PPL's CDBG and ARRA funds with priority going to referrals that are also on MPHA's Section 8 HCV waiting list. MPHA's Section 8 HCV waiting list will have a 'remains open' clause for specific referrals for this program

Update

All twenty-one (21) units remained occupied in 2014. It is expected that all units will remain occupied and remain active in 2015 as a preserved unit of affordable housing. In 2013, MPHA won a NAHRO Award of Merit for implementing this program.

MPHA is not using outside evaluators for this activity. MPHA does not anticipate a need to employ additional authorizations to continue initiatives under this section.

MTW Authorization:

MTW Amended and Restated Agreement – Attachment C: D Authorizations related to Section 8 housing choice vouchers only; 7 b and c : These authorizations waive certain provisions of 24CFR 983.51 as necessary to implement the Agency's Annual MTW Plan and Site selection standards set forth in 24CFR Section 1983.57

Statutory Objective:

Increase Housing Choices: This will enable very low income families who are at risk of homelessness to secure housing and also help achieve greater cost effectiveness in federal expenditures by helping to secure the investments of the Federal NSP program expenditures and providing a stable operating fund for the purchased and rehabbed developments.

Metrics, Baselines and Benchmarks

CE #4: Increase in Resources Leveraged				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Amount of funds leveraged in dollars (increase).	$2,554,083 leveraged prior to implementation of the activity.	$2,554,083 leveraged after implementation of the activity.		

HC #2: Units of Housing Preserved				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	Housing units preserved prior to implementation of the activity - 0.	Expected housing units preserved after implementation of the activity - 21.		

FY2009 – Activity 1: Block Grant and Fungible Use of MPHA Resources

Per HUD direction, this Activity is addressed in Section VII: Sources and Uses of Funding.

FY2009 - Activity 2: Recertify Elderly or Disabled Public Housing Resident Families Once Every Three Years Instead of Annually

Description of Activity (Approved in 2009 and phased in implementation through 2012)
MPHA certifies families who are elderly or disabled and who are on a fixed income every three years instead of annually. This saves time and effort for these residents and helps MPHA to more effectively target its resources.

This measure reduces costs and enables MPHA to focus staff resources on other critical needs. After implementation, many elderly and disabled residents have favorably commented on this initiative. MPHA is utilizing EIV to assist with monitoring incomes and outcome metrics for this initiative.

Update
MPHA phased this in over a three-year period and it is now fully implemented. MPHA now recertifies residents every three years according to a schedule that allows one-third of impacted residents to be recertified every year. It is estimated that 3,300 residents will benefit from this MTW activity.

This activity has reduced the number of annuals done per Eligibility Technician (ET) allowing the ET's to follow up on long-term minimum renters and MPHA's high number of interim recertification requests. MPHA will continue this initiative in 2015. These metrics have not been used in a previous report and information is not currently available. MPHA will be tracking this information in 2015.

MTW Authorization:

Initial, Annual and Interim Income Review Process: Provided in Attachment C Section C 4. This Section waives certain provisions of Sections 3(a) (l) and 3 (a) (2) of the 1937 Act and 24 C.F.R. 966.4 and 960.257, as necessary to implement the Agency's Annual MTW Plan.

Statutory Objective:

Reduce costs and achieve greater cost effectiveness. MPHA anticipated this change would save the agency time and allow better utilization of its resources and believes this change also provides a significant benefit to its residents.

Metrics, Baselines and Benchmarks

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity $119,371.	Expected cost of task after implementation of the activity $90,000		

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity - 4,406 hours.	Expected amount of total staff time dedicated to the task after implementation of the activity - 3,376 hours.		

CE #5: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity -$14,437,400	Expected rental revenue after implementation of the activity - 1.5% PER YEAR; IN 2015: $17,756,181		

The HUD standard metric above incorporates MPHA's current metrics and it will replace same. MPHA is not using outside evaluators for this activity. MPHA does not anticipate a need to employ additional authorizations to continue initiatives under this section.

FY2009 – Activity 4: (Rent Reform) Public Housing Two Year Income Disregard

Description of Activity (Approved in 2009 and implemented in 2010).

Federal regulations allow certain families a full income disregard for one year and a 50% disregard for the second year. As families move in and out of employment, the disregard is postponed; the monitoring is time consuming and creates administrative hardships that are prone to errors. MPHA created a full two year income disregard for eligible families, which eliminated the administrative hardship and time consuming monitoring.

This MTW initiative enables MPHA to reduce costs and achieve greater cost effectiveness. In addition, it provides an incentive for families to maintain employment because the program is limited to two years. By maintaining employment, they receive a full disregard for two years instead of the full disregard for one year and a 50% disregard for the second year.

MPHA has adopted changes to the ACOP and implemented this initiative. MPHA estimates that 200 families will take advantage of this program. MPHA will track the families on this program and after two years evaluate its success. MPHA is utilizing EIV to assist with monitoring incomes and outcome metrics for this initiative.

MTW Authorization:

Rent Policies and Term Limits: Provided in Attachment C Section C 11. This Section waives certain provisions of Sections 3(a)(2) and 3 (a) (3)(A) and Section 6(1) of the 1937 Act and 24 C.F.R. 5.603, 5.611, 5.628, 5.632, 5.634 and 960.255 and 966 Subpart A, as necessary to implement the Agency's Annual MTW Plan.

Statutory Objective:

Reduce costs and achieve greater costs effectiveness and gives incentives to families to obtain employment. Allows MPHA to reduce costs and focus staff resources on other agency needs.

Gives families incentive to work by disregarding the incremental earnings of qualified families.

Update

Staff reports that this has greatly streamlined and simplified the Earned Income Disregard (EID). Residents understand and are able to follow this program better. This program has had more limited participation than initially estimated due to the economic crisis that has denied resident the opportunity to secure employment and take advantage of this program. MPHA intends to continue this program in 2015.

MPHA has included the MTW metric charts for this activity, but as these metrics have not been used in a previous annual report and the information is not currently available, MPHA is tracking this information in 2014.

Metrics, Baselines and Benchmarks

Families Participating in Earned Income Initiative				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of families (increase).	Total number of families participating in EID prior to implementation – 6.	Expected number of families after implementation – 50 per year.		

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity $1,166	Expected cost of task after implementation of the activity $4,000		

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity 10 hours per EID	Expected amount of total staff time dedicated to the task after implementation of the activity 4 hours per EID		

CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity 50%	Expected average error rate of task after implementation of the activity 10%		

CE #5: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity - $14,437,400	Expected rental revenue after implementation of the activity - 1.5% PER Y EAR; IN 2015: $17,756,181		

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars). $7,500		

SS #3: Increase in Positive Outcomes in Employment Status				
Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Report the following information separately for each category: (6) Other: Employed full or part tome	Head(s) of households in prior to implementation of the activity (number). 1	Expected head(s) of households in <<category name>> after implementation of the activity (number). 50		
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be 0.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).		

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving TANF assistance (decrease).	TBD	TBD		

MPHA has added this metric; however, as this metric has not been used in previous annual plans or reports and the information is not currently available, MPHA will being tracking this metric in 2015.

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).$279	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).$250		

SS #7: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).$14,437,400	Expected PHA rental revenue after implementation of the activity (in dollars).18,000,000		

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). 0	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number). 50		

FY2009 – Activity 6 (Amendment): Section 8 HCV Mobility Voucher Program

Description of Activity (Approved in 2009 and implemented in 2010).
MPHA created a Mobility Voucher program to encourage low-income families to move to communities of greater opportunity that are not impacted by poverty or race to find safe, decent and affordable housing in an environment conducive to breaking the cycle of poverty. This initiative responds to HUD's goal of deconcentrating families who live in poverty. The program was structured to increase housing choices for families on the MPHA Section 8 Waiting List and current program participants who lived in areas concentrated by poverty and who were willing to move into non-concentrated areas. MPHA has created an appendix to its Section 8 Administrative Plan that details the specific elements of this initiative.

On January 1, 2012, due to severe budget constraints, the Minneapolis Public Housing Authority's (MPHA) Housing Choice Voucher (HCV) Program placed a hold on all new admissions to the program from the Waiting List; which included new admissions to the Mobility Voucher Program. Limiting admission to current HCV participants proved futile - the incentives to provide $1,000.00 moving costs to Mobility admission families and the establishment of escrow accounts for those families were incentives that could not be implemented as funding sources continued to diminish. The result was that there was no incentive in place to encourage families to enter into a more restrictive Mobility Voucher Program (MVP) contract that required families to reside in approved communities in the City of Minneapolis for a minimum of three (3) years, or face loss of the voucher assistance. In January, 2014 with the advent of Rent Reform, MVP participants faced even greater challenges in locating and maintaining affordable units in areas of Minneapolis that were not concentrated by poverty. The HCV Program realized it was time to revise and revitalize the Mobility Voucher Program.

MTW Authorization:

Waiting List Policies: Provided in Attachment C Section D4. This Section waives certain provisions of Sections 8(o)(6,8(o)(13) and 8 (o) (16) of the 1937 Act and 24 C.F.R. 982

Subpart E, 982.305 and 983 Subpart F, as necessary to implement the Agency's Annual MTW Plan.

Statutory Objective:
Increase housing choices. Provides incentive for waiting list families and current Section 8 participants to move into non-poverty concentrated areas.

Anticipated Changes

In early 2014, we began to access our current Waiting List in an effort to increase utilization of Mobility vouchers. It is a time consuming process, due to the specific eligibility criteria for applicants: the applicant must have minor children, be employed, enrolled in a job-training program or an educational institution, and currently living in an area impacted by poverty and willing to move to a community of greater opportunity. Out of the first sixty (60) applicants selected for the Mobility Program, we were only able to issue five (5) Mobility vouchers. It

was time for change. Anticipated changes include: 1) Create more housing opportunity by expanding the housing search area to include the seven county metropolitan area; however, the unit must still be determined to be located in an area no impacted by poverty. 2) The Mobility Coordinator will take a more active role in providing assistance with the housing search, the review of lease agreements and the role of liaison between property owner and participant family.

In July of 2014, the HCV Program sent informational flyers to the first 500 applicants on the Waiting List, inviting eligible applicants to contact us to schedule intake appointment for determination of admission to the Mobility Voucher Program.

Metrics, Baseline, and Benchmarks

HC #5: Increase in Resident Mobility				
Unit of Measurement	**Baseline**	**Yearly Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity	0	25		

HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	**Baseline**	**Yearly Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase housing choice	0	25		

These HUD Metrics will replace current metrics as they are inclusive of current metrics. MPHA is not using outside evaluators for this activity. MPHA does not anticipate a need to employ additional authorizations to continue initiatives under this section.

NOT YET IMPLEMENTED ACTIVITIES

FY2013 Activity 2: Alternate Income Verifications

Description (Approved in 2013 and Not Yet Implemented)
MPHA faces a dilemma regarding verification requirements in Notice PIH 2008-44 (HA) and the successful operation of its Housing with Services / Assisted Living public housing programs regarding verification of incomes. There are instances where a potential HWS / Assisted Living public housing resident must be quickly approved for public housing or otherwise have to remain in hospital, sent home or to a relative without appropriate care or transferred to a nursing home or other non-public housing assisted living provider. These actions potentially put vulnerable persons at risk, cost additional local, state and/or federal dollars, and threaten the stability of MPHA's Assisted Living programs in that apparently eligible persons are delayed from moving in due to HUD's income verification and asset verification requirements. For example, Social Security verification can take 10 days, and are only sent to the requestors address, not to MPHA. Potential residents with vulnerabilities may not be at their home to get the verifications, may forget to open them, etc. and the placement into assisted living can be delayed. This results in a loss of a placement and threatens the viability of assisted living at a PHA development. Loss of this vital resource then puts vulnerable residents at risk, results in others having to go to nursing homes, emergency rooms, hospitals etc. and results in significantly higher taxpayer costs.

MTW Authorization:

This initiative invokes certain provisions of Attachment C - C 2. Local Preferences and Admission and Continued Occupancy Policies and Procedures This authorization waives certain provisions of Section 3 of the 1937 Act and 24 CFR 960.206 as necessary to implement the Agency's Annual MTW Plan; Attachment C - C 4. Initial, Annual and Interim Income Review Process. This authorization waives certain provisions of Section 3 (a) (1) and 3 (a) (2) of the 1937 Act and 24 CFR 966.4 and 960.257 206 as necessary to implement the Agency's Annual MTW Plan.

Statutory Objective:
As an MTW Initiative, this activity addresses the statutory objective of expanding housing choices by providing a supportive and/or housing with services option to persons who would otherwise be required to remain in the hospital, nursing home or remain in an extremely vulnerable living situation without necessary assisted living or other needed services.

- These clients often come from a situation where the person may be homeless, has no family etc. many times they cannot find or access verifications of income or assets or because of physical or mental state cannot access this information timely.

- MPHA believes that if an applicant is eligible and has income information, such as SSI income with another unit of government, e.g. State/County Medicaid, Food Stamp program etc. that clearly demonstrates eligibility for public housing, MPHA should be able to utilize this information to sign a lease and move the tenant into housing. If there is a small discrepancy in actual income, for example an increase in SSI or SSA since the county last verified income, that can be taken care of with a correction, in the same manner as a mistake in rent calculation.

Update

This initiative went into effect in January of 2013 and due to low turnover in this program, MPHA is revising its benchmarks to reflect the most likely utilization. MPHA is hopeful as it opens its new acute assisted living-memory care program at its Signe Burkhardt development in mid to late 2015, to utilize this initiative for quickly processing vulnerable persons for housing in the program. If this initiative proves to be necessary for this process, MPHA will move it back into the Implemented portion of the plan and identify this action in the 2015 MTW Report.

Anticipated Impacts:

The primary purpose of this activity is to enable low-income persons in need of assisted living to receive housing with services that would not be available to them with the current regulatory requirements for verification of income in public housing. This activity will permit extremely vulnerable persons who are in desperate need of both public housing and Assisted Living and/or Housing with Services to be admitted to public housing without delay. It will also support service providers with continuity of placement that will allow them to meet their operations costs that are continually threatened by program vacancies. It is a win for potential residents, MPHA and Assisted Living/Housing with Services providers.

Baseline and Benchmarks

Baseline: Zero – MPHA is currently unable to use alternate income verifications.

Benchmarks: Five (5) admissions per year utilizing alternate income verifications. MPHA has seven Assisted Living and Housing with Services programs that are licensed to provide care for those at a vulnerability level where delays in placement would threaten their ability to be housed in these programs.

Data Collection & Metrics

1. MPHA and Assisted Living service providers will collaborate in identifying resident/participants, on gathering the alternate income verifications and documenting assignment of units and simultaneous admittance into the Assisted Living program.

2. MPHA will track the start date of the application verification process to the approval date for all highrise assisted living applicants and compare that time period to the start date of the application verification process to the approval date for those highrise assisted living applicants where MPHA utilized the alternative income verification.

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	TBD	TBD		

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	TBD	TBD		

CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average error rate in completing a task as a percentage (decrease).	TBD	TBD		

CE #5: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Rental revenue in dollars (increase).	TBD	TBD		

HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase housing choice (increase).	0. At time of adoption, MPHA was unable to use income verifications.	5 per year.		

These HUD Metrics will replace current metrics as they are inclusive of current metrics. MPHA is not using outside evaluators for this activity. MPHA does not anticipate a need to employ additional authorizations to continue initiatives under this section.

FY2010 – Activity 3: Conversion of 312 Mixed-Financed public housing units to Project Based Section 8

Description (Approved in 2010 and Not Yet Implemented)

MPHA intends to utilize MTW authority to convert 312 mixed-finance public housing units of which MPHA neither owns nor manages, to Section 8 Housing Choice Vouchers and then project base these units in the same mixed-finance development. For the 200 Heritage Park units, MPHA will also waive the current requirements limiting project based units to a certain percentage of the development.

Update

MPHA will aggressively pursue the conversion of the 200 public housing units that are part of the mixed-income development in Heritage Park through HUD's Voluntary Conversion program, including utilizing MTW authority as needed to address the limitations on project basing more than 20% of the units in a development and other areas that may need regulatory relief as MPHA goes through his process. MPHA completed paperwork for submission of a voluntary conversion application for the 200 Heritage Park units to HUD and secured Board approval for a technical amendment to MPHA's 2014 MTW Plan. MPHA submitted the application to HUD and the Amendment to the MTW office in January, 2015. MPHA will move this initiative to the "Approved Activities" category if HUD approves the Agency's Voluntary Conversion plan in 2015.

MTW Authorization:

MTW Amended and Restated Agreement – Attachment D [B1] Attachment C [D Authorizations related to Section 8 housing choice vouchers only/ 2. Rent Policies and Term Limits, and 7. Establishment of an Agency MTW Section 8 Project-Based Program] This authorization waives certain provisions of Sections 3, 6, 7, 16 and 31 of the 1937 Act and 24 CFR 945 Subpart C, 960 Subparts B, D, E and G as necessary to implement the Agency's Annual MTW Plan and [D2 – Authorizations related to Section 8 only – Rent Policies and Term Limits] This authorization waives certain provisions of Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 CFR 982.508, 982.503 and 982.518 as necessary to implement the Agency's Annual MTW Plan.

Statutory Objective:

Reduce costs and achieve greater cost effectiveness in Federal expenditures and increase housing choices.

CLOSED OUT ACTIVITIES

Activity 2012-1: Biennial Housing Quality Standards Inspections for Multifamily Complexes

MTW Authorization:
This provision invokes certain provisions of Attachment C generally and including Section B1b.iv; Section D 5 and waives certain provision of Section 8(o)(8) of the 1937 Act and 24C.F.R. 982 Subpart I (See Attachment III for MPHA's Inspection Self-Certification Overview and Form).

Statutory Objective:
Reduce cost and achieve greater cost effectiveness in Federal expenditures

Description: (Approved and implemented in 2012)

HUD's approval of MPHA's 2012 MTW Plan gave us the authority to change the HCV Program's annual Housing Quality Standards (HQS) Inspection requirement to a biennial HQS Inspection requirement for units in multifamily complexes of six (6) units or more and where 80% of those units passed HQS Inspections in the prior two years.

Changes or Modifications

Section 220 of the 2014 Congressional Appropriations Act "allows public housing authorities to inspect assisted dwelling units during the term of a HAP Contract by inspecting such units not less than biennially instead of annually". MPHA 's current MTW initiative under this category is fully compliant with all the allowances under Section 220 of the 2014 Congressional Appropriations Act and therefore, the Agency is closing out this activity as MTW authority is no longer required.

FY2009 – Activity 3: Combine MPHA's Current Homeownership Programs into a Single MTW Initiative with a Foreclosure Prevention Component

Description of Activity (Approved and Implemented in 2009)

Under MTW, MPHA's homeownership initiatives, Home Ownership Made Easy (HOME) and Moving Home (Section 8 Homeownership Demonstration Program) was revised and combined with a new Foreclosure Prevention Initiative that is designed to assist some low-income families in avoiding foreclosure.

This program combines the funding for counseling and all activities leading to purchase through MPHA's MTW homeownership initiatives, along with post-purchase follow-up efforts. Program participants are offered an opportunity to purchase their homes with Section 8 support or to utilize a significant down payment assistance offered through a partner agency and purchase without Section 8 assistance. The participant with assistance from the contracted counselor and the lending institution will select a purchase option.

Update

MPHA discontinued this program in 2012 due to federal funding cutbacks in its housing programs.

MTW Authorization:

Continuation of Previously Authorized Activities: Provided in Attachment D; A This Section waives certain provisions of Sections 8, 9 and 23 of the 1937 Act and 24 C.F.R.941, 982, and 984 as necessary to implement the Agency's Annual MTW Plan.

Statutory Objective:

Expand housing choices and Self sufficiency. Will allow public housing residents and Section 8 participants to move into home ownership with Section 8 assistance.

Provides incentives that support self sufficiency goals.

FY2009 – Activity 5: Implement a New Public Housing Family Self-Sufficiency Program

Description of Activity (Approved and Implemented in 2009)

MPHA has implemented a new public housing Family Self-Sufficiency (FSS) program targeted for families who seek to become home owners. This program is targeted to serve 50-75 families and has participation requirements to meet MPHA's homeownership program eligibility requirements. MPHA has implemented a provision that allows up to 25 working families or those who receive unemployment benefits to participate in the FSS program as long as they maintain homeownership as their primary goal.

Update

MPHA discontinued this program in 2012 due to federal funding cutbacks in its housing programs.

MTW Authorization:

Authorizations related to Self Sufficiency: Provided in Attachment C Section E. This Section waives certain provisions of Sections 23 of the 1937 Act and 24 C.F.R.984, as necessary to implement the Agency's Annual MTW Plan.

Statutory Objective:

Promote Self Sufficiency and increase housing choices. The FSS program positions families to meet FSS purpose of MTW.

Homeownership focus support housing choices beyond public housing and market rate rental.

SECTION V: SOURCES and USES of FUNDS

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

Attachment B

(V) Sources and Uses of Funds

Annual MTW Plan

A. MTW Plan: Sources and Uses of MTW Funds

Estimated Sources of MTW Funding for the Fiscal Year

PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.

Sources

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	18,600,000
70600	HUD PHA Operating Grants	61,200,000
70610	Capital Grants	9,600,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0
71100+72000	Interest Income	60,000
71600	Gain or Loss on Sale of Capital Assets	50,000
71200+71300+71310+71400+71500	Other Income	7,100,000
70000	Total Revenue	96,610,000

Estimated Uses of MTW Funding for the Fiscal Year

PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.

Uses

FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	9,900,000
91300+91310+92000	Management Fee Expense	7,550,000
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	770,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	8,200,000
93500+93700	Labor	400,000
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	11,200,000
95000 (95100+95200+95300+95500)	Total Protective Services	1,500,000
96100 (96110+96120+96130+96140)	Total insurance Premiums	970,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	2,700,000
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	2,157,463
97100+97200	Total Extraordinary Maintenance	100,000
97300+97350	Housing Assistance Payments + HAP Portability-In	43,200,000
97400	Depreciation Expense	16,000,000
97500+97600+97700+97800	All Other Expenses	0
90000	**Total Expenses**	104,647,463

Describe the Activities that Will Use Only MTW Single Fund Flexibility
MPHA will use the MTW Single Fund Flexibility to offset the anticipated federal funding shortfall in the Operating Fund Program. Cost savings due to the HCV Rent Reform Initiative will continue to free up HAP funding, which will be used to continue to offset the subsidy loss in the Operating Fund Program.

1

V.2.Plan.Local Asset Management Plan

B. MTW Plan: Local Asset Management Plan

Is the PHA allocating costs within statute?	Yes	or	N/A
Is the PHA implementing a local asset management plan (LAMP)?	N/A	or	No

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix?	N/A	or	No

N/A

[1]The Expenses exceed the Revenues on the Sources and Uses Report due to the inclusion of Depreciation Expense instead of capitalized expenditures. MPHA is not expecting to incur a net operating loss, the loss will reduce the equity balance shown in FDS line 508.1.

SECTION VI: ADMINISTRATIVE

The MPHA Board of Commissioners approved the creation of a Resident Advisory Board for this year's plan process in March 2014. The Resident Advisory Board (RAB) consists of eleven resident/participant members that represent the Tenant Advisory Committee, the Security Advisory Committee, the Maintenance, Modernization and Management Committee, the Minneapolis Highrise Representative Council, the Minneapolis Scattered Site Resident Council and Section 8/HCV. The Resident Advisory Board meets with MPHA staff who coordinate and submit the MTW Plan. The Resident Advisory Board met on the following dates:

May 13, 2014	July 22, 2014
May 27, 2014	August 12, 2014
June 7, 2014	September 9, 2014
July 8, 2014	September 23, 2014

All meetings are held at the MPHA Administrative offices at 1001 Washington Avenue North, Minneapolis, MN. The Resident Advisory Board adopted the following Guiding Principles/Priorities for this year's Plan Process (The Guiding Principles and Priorities are not listed in any particular order):

GUIDING PRINCIPLES	PRIORITIES
• Preserve Housing Stock and well maintained buildings - Hold Maintenance Staff accountable. • Preserve Section 8 vouchers for current participants. • Maintain secure public housing, Project Lookout funding and create a comprehensive security program. • No rent increase. • One-for-one replacement. • Keep Resident Self Help funding. • No housing timelines. • Focus on the most needy. • Create a Job Bank and focus on resident employment opportunities including Section 3 as part of all MPHA activities. • Maintain highest standards for maintenance staff. • MPHA should actively enforce rules about weapons and drugs on MPHA properties.	• Preserve housing stock and well maintained buildings. Hold maintenance staff accountable. • Preserve Section 8 vouchers for current participants. • Maintain secure public housing, Project Lookout funding and create a comprehensive security program. • One-for-one replacement. • Keep resident self help funding. • Create collaborations that increase affordable housing and/or services for residents. • No housing timelines. • Activities that provide incentives for resident participation (i.e., Diversity Program). • Provide more intensive pest control. • Section 8 participants need a forum/organization for representation. • Maintain highest standards for maintenance staff. • MPHA should actively enforce rules about weapons and rugs on MPHA properties.

MPHA published a Notice of the availability of the MPHA Draft FY2015 MTW Plan and supporting documents and public hearing in the Minneapolis Star Tribune Newspaper on July 27, 2014. The actual public comment period for the MPHA Draft FY2015 MTW Plan and draft supporting documents began on August 1, 2014 and continued through September 5, 2014.

MPHA hosted an 'Advance Meeting' on August 14, 2014 for public housing residents of highrises, scattered sites, MPHA's Glendale family development and Section 8 HCV participants. MPHA mailed 150 invitations to random Section 8/HCV participants for this meeting. MPHA presented the new initiative in the Draft 2015 Plan and also significant changes to the MPHA Statement of Policies (ACOP), Section 8/HCV Administrative Plan and the 2015 Capital Fund Program plan.

There was a Public Hearing before the MPHA Board of Commissioners on Wednesday, August 27, 2014. Six residents/participants spoke regarding the Draft Plan and supporting documents before the Board. The President of the Minneapolis Highrise Representative Council also spoke before the Board.

MPHA Board of Commissioners Meeting - Public Hearing
August 27, 2014 - 1:30 PM
1001 Washington Avenue North - 1st Floor Board Room
Minneapolis, MN

MPHA Board of Commissioners Meeting - Request for Approval
September 24, 2014 - 1:30 PM
1001 Washington Avenue North - 1st Floor Board Room
Minneapolis, MN

MPHA received a total of 106 comments during the public comment period. MPHA responded to all comments which are attached to this Plan in Appendix B.

The Annual Statement/Performance and Evaluation Report (HUD 50075.1) is attached in Appendix C of this document.

The Minneapolis Public Housing Authority Board of Commissioners approved the 2015 Moving To Work Plan on September 24, 2014. The Board Report and Resolution along with the Certification of Compliance signed by the MPHA Board Chair is attached in Appendix D.

MPHA has no planned or ongoing PHA-directed evaluations of the demonstration for the overall MTW Program or any specific MTW activities.

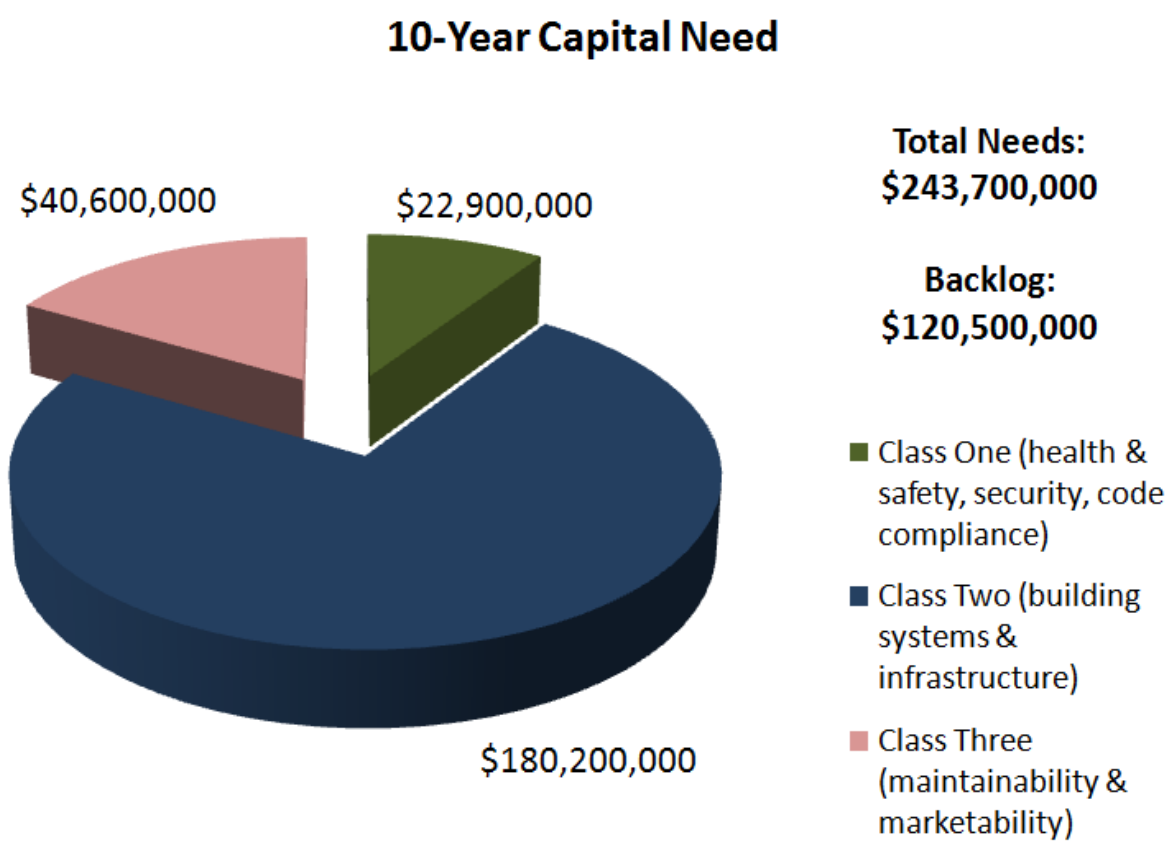
APPENDIX A: PLANNED CAPITAL EXPENDITURES

Capital Needs Data

Minneapolis Public Housing Authority's (MPHA) housing stock is comprised of 42 highrise buildings, 733 scattered site homes, 184 rowhouse units, and three maintenance, administrative, and service facilities. Forty of the forty two highrise buildings in MPHA's inventory were built in the 1960's and early 1970's; the age range of MPHA's single-family homes is 2 – 100+ years old, and our single remaining row house development is 60+ years old. The most recent needs analysis indicates an unmet capital need of approximately $244 million over the next ten years for MPHA's facilities. MPHA began its comprehensive physical needs assessment process in 2014, which included contracting with specialty consultants to assess major building systems such as HVAC, roofs, facades, and elevators. At the time the draft 2015 MTW Plan was written, MPHA had received a number of reports from these consultants so our PNA data was updated accordingly. We are now concluding the inspection and data gathering process and expect another increase to the latest figure of $244 million. A comprehensive physical needs assessment is planned for 2014/15. MPHA will comply with the protocol established in HUD's Green Physical Needs Assessment (GPNA) tool, which includes a green component and assesses capital needs for a 20-year period. As of this report, MPHA continues to gather and analyze additional needs data and expects to complete the GPNA in early 2015. To aid in capital planning, MPHA considers two factors in its needs data:

1. The classification of the needs as:
    - Class One: Life, Safety, and Code Compliance (e.g. asbestos abatement, security-related improvements, fire suppression systems)
    - Class Two: Building Systems/Infrastructure (e.g. mechanical systems, plumbing and electrical systems, roofs/façades, windows, elevators, etc.)
    - Class Three: Maintainability/Marketability (apartment kitchen and bath rehab, landscaping/site improvements, building amenities, etc.)
2. The remaining useful life of the need, which can range between 0 – 20 years.

The breakdown by classification of our 10-year $244 million capital need is illustrated below:



As shown above, a large portion of our capital needs falls into the Class Two classification; due to their age, building systems at many of our buildings have exceeded their life expectancy. MPHA deems a portion of these Class Two work items as critical needs that could become Class One/life safety needs if left unaddressed. Additionally, as building codes have evolved, we need to address increased fire protection requirements such as retrofitting our highrise buildings with sprinkler systems. This need comprises approximately $11 million of the $23 million identified in Class One. Operating budget shortfalls have resulted in decreased security guard coverage at our buildings, so an additional $5 million in security [Class One] needs have been identified, measures that are needed to enhance resident safety in our highrises. MPHA has made these items a priority and will target these types of improvements over the next ten years.

FY15 Significant Capital Expenditures by Development

MPHA is basing its CFP on an MTW allocation of $8 million for 2015. Projects that were initiated under previous funding cycles, but not fully completed in prior years, will carry over and experience expenditures in 2015. Additionally, a portion of the projects slated for 2015's $8 million budget will not be fully expended in 2015 and will carry into 2016. This expenditure schedule is based on the assumption of receiving the Capital Fund grant by the end of July 2015. MPHA has estimated approximately $14.46 million in Capital Fund expenditures for FY 15 (see attached charts) targeted at specific projects in all of its seven Asset Management Projects (AMPs). Details for projects included in the FY2015 plan follow. In performing its capital work, MPHA adheres to Federal, State and Local codes, and regulatory requirements.

AMP 2 (Scattered Sites): $200,000

Due to the severe shortage of funding, any capital improvements in scattered sites will be limited to roofs and other critical infrastructure upgrades. MPHA is allocating $200,000 for these types of improvements in FY2015.

AMP 3 (North): $900,000

MPHA will initiate major plumbing replacement, roof replacement, and apartment improvements required as part of the plumbing work at 3116 Oliver Avenue. At 1710 Plymouth Avenue MPHA will commence major plumbing replacement, roof replacement, sprinkler system installation, elevator modernization, and common area improvements. These projects will be funded over two years, FY 2015 and 2016.

AMP 4 (Northeast): $1,200,000

Major plumbing replacement, roof replacement, façade restoration, sprinkler system installation, and apartment upgrades will continue at 311 University Avenue NE. This funding is for the second phase of a project funded over two years, 2014/15.

AMP 5 (Hiawatha): $1,240,000

Elevator modernization at both 5th Avenue South high-rises.

AMP 7 (Horn):$2,170,000

Elevator modernization at 1415 East 22nd Street. Roof replacement, plumbing upgrades, sprinkler system installation, and apartment improvements at all three Horn Towers will be initiated in 2015 as the first of a three phase project.

Area Wide Building System Upgrades: $1,215,000

During FY 2015, the Facilities and Development Department will implement a variety of building upgrades such as major HVAC and electrical systems improvements at AMPs where other major projects are planned. The specific improvements are being defined and will be included in the scope of the major project at each site.

CAPITAL PROJECTS – FY 2015

AMP	PROJ	ADDRESS	WORK ITEMS	PROJECT COST	2015 EXPENDITURES
N/A	N/A	N/A	Administration	$1,065,000	$1,065,000
N/A	N/A	N/A	Audit fee	$10,000	$10,000
2	Varies	Scattered Sites	Roof replacement, infrastructure	$200,000	$200,000
3	20.5	3116 Oliver Ave N	Piping, roof replacement, apartment mod (phase I of II)	$300,000	$100,000
3	26	1710 Plymouth Ave N	Piping, roof replacement, sprinklers, elevator modernization, common area upgrades (phase I of II)	$600,000	$300,000
4	10	311 University Ave NE	Piping, roof replacement, façade restoration, apartment upgrades, sprinklers (phase II of II)	$1,200,000	$600,000
5	34	Fifth Avenue Highrises	Elevator modernization	$1,240,000	$620,000
7	14	1415 E 22nd St	Elevator modernization	$620,000	$20,000
7	31	Horn Towers	Piping, roof replacement, sprinklers, apartment upgrades (phase I of III)	1,550,000	$550,000
N/A	N/A	Area-Wide	Building systems upgrades	$1,215,000	$500,000
TOTAL – 2015 CAPTIAL BUDGET				**$8,000,000**	

CARRYOVER CAPITAL PROJECTS (These are projects from a previously approved MTW annual and five year CFP plan that will incur expenditures during FY 2015)

AMP	PROJ	ADDRESS	WORK ITEMS	PROJECT COST	2015 EXPENDITURES
4	10	311 University Ave NE	Piping, roof replacement, façade restoration, apartment upgrades, sprinklers (phase I of II)	$900,000	$600,000
4	32	1717 Washington St	Façade restoration, mechanical upgrades	$500,000	$250,000
5	18.5	2533 1st Ave S	Commons, windows, apartment upgrades, piping, sprinkler system, façade restoration	$4,250,000	$1,900,000
5	19	1920 4th Ave S	Elevator modernization	$620,000	$310,000
6	8	Elliot Twins	Elevator modernization	$1,240,000	$620,000
6	16	1515 Park Ave S	Façade restoration	$750,000	$700,000
6	30	630 Cedar Ave S	Façade restoration	$235,000	$215,000
7	14	1415 E 22nd St	Piping replacement, sprinklers, mechanical upgrades, apartment upgrades	$4,200,000	$3,500,000
N/A	96	1001 Washington	Building/security improvements	$1,200,000	$1,200,000
1 – 7	Varies	Area-Wide	Security upgrades	$1,850,000	$1,200,000
TOTAL – 2015 PLANNED EXPENDITURES					**$14,460,000***

**The level and timing of these expenditures will vary depending on the final formula amount and the grant release date. The actual project allocations may also change as new GPNA data becomes available, other grants are secured, and a final formula amount is established.*

Minneapolis Public Housing Authority
2015 Capital Fund Five-Year Action Plan
Schedule of Planned Expenditures

AMP 1 - Rowhouses

AMP	Project	Address	Bldgs	Units	FY15	FY16	FY17	FY18	FY19
1	1	Glendale	28	184	0	0	0	0	0
		Total AMP 1	**28**	**184**	**0**	**0**	**0**	**0**	**0**

AMP 2 - Scattered Site/Single Family

AMP	Project	Address	Bldgs	Units	FY15	FY16	FY17	FY18	FY19
2	Various	Various	733	733	200,000	200,000	200,000	200,000	200,000
		Total AMP 2	**733**	**733**	**200,000**	**200,000**	**200,000**	**200,000**	**200,000**

AMP 3 - North

AMP	Project	Address	Bldgs	Units	FY15	FY16	FY17	FY18	FY19
3	3	800 North Fifth Ave	1	66	0	0	0	0	0
3	20.4	2415 North Third Street	1	62	0	0	0	0	0
3	20.5	3116 North Oliver Ave	1	31	100,000	1,000,000	0	0	0
3	23	315 North Lowry Ave	1	193	0	0	0	0	0
3	25	600 North 18th Ave	1	239	0	0	0	0	0
3	26	1710 North Plymouth Ave	1	84	300,000	2,000,000	700,000	300,000	0
3	28	1015 North Fourth Ave	1	48	0	0	0	0	0
3	37	1314 North 44th Ave	1	220	0	0	0	100,000	2,000,000
3	42	314 Hennepin Ave	1	299	0	0	0	0	310,000
3	50	350 Van White Memorial Blvd	1	102	0	0	0	0	0
		Total AMP 3	**10**	**1,344**	**400,000**	**3,000,000**	**700,000**	**400,000**	**2,310,000**

AMP 4 - Northeast

AMP	Project	Address	Bldgs	Units	FY15	FY16	FY17	FY18	FY19
4	10	311 NE University Ave	1	49	1,200,000	600,000	0	0	0
4	15.4	710 NE Second Street	1	35	0	0	0	0	0
4	15.5	616 NE Washington Ave	1	35	0	0	0	0	0
4	21.4	1206 NE Second Street	1	57	0	0	200,000	1,000,000	0
4	21.5	1900 NE Third Street	1	32	0	0	0	0	150,000
4	21.6	809 NE Spring Street	1	32	0	0	0	0	100,000
4	32	1717 NE Washington Street	1	182	250,000	0	0	0	0
4	33	828 NE Spring Street	1	189	0	0	0	310,000	310,000
4	35	1815 NE Central Ave	1	333	0	0	0	250,000	750,000
		Total AMP 4	**9**	**944**	**1,450,000**	**600,000**	**200,000**	**1,560,000**	**1,310,000**

Minneapolis Public Housing Authority
2015 Capital Fund Five-Year Action Plan
Schedule of Planned Expenditures

AMP 5 - Hiawatha

AMP 5	Project	Address	Bldgs	Units	FY15	FY16	FY17	FY18	FY19
5	9	Hiawatha Towers	3	281	0	620,000	950,000	840,000	0
5	18.5	2533 South First Ave	1	42	1,900,000	0	0	0	0
5	19	1920 South Fourth Ave	1	110	310,000	0	0	0	0
5	24	1707 South Third Street	1	199	0	0	0	0	100,000
5	34	2419/33 South Fifth Ave	2	254	620,000	620,000	0	500,000	1,000,000
		Total AMP 5	**8**	**886**	**2,830,000**	**1,240,000**	**950,000**	**1,340,000**	**1,100,000**

AMP 6 - Cedars

AMP 6	Project	Address	Bldgs	Units					
6	6 & 30	Cedars Community	4	539	215,000	0	620,000	930,000	310,000
6	8	Elliot Twins	2	174	620,000	50,000	450,000	0	0
6	16	1515 South Park Ave	1	182	700,000	0	0	0	0
		Total AMP 6	**7**	**895**	**1,535,000**	**50,000**	**1,070,000**	**930,000**	**310,000**

AMP 7 - Horn

AMP 7	Project	Address	Bldgs	Units					
7	14	1415 East 22nd Street	1	129	3,520,000	600,000	0	0	0
7	17	2728 East Franklin Ave	1	151	0	0	100,000	2,000,000	400,000
7	18.4	3755 South Snelling Ave	1	28	0	0	0	0	250,000
7	22	3205 East 37th Street	1	28	0	0	0	0	25,000
7	31	Horn Towers	3	491	550,000	1,550,000	1,550,000	1,000,000	930,000
7	36	2121 South Minnehaha Ave	1	110	0	0	0	0	310,000
		Total AMP 7	**8**	**937**	**4,070,000**	**2,150,000**	**1,650,000**	**3,000,000**	**1,915,000**

Management, Maintenance,and Special Facilities

	Project	Location	Bldgs	Units					
	29	901 North Fourth Ave (HPSCC)	1		0	0	0	0	0
	93	1301 Bryant Maintenance Off.	1		0	0	0	0	0
	96	1001 Washington Main Office	1		1,200,000	0	0	0	0
		Total MM&S	**3**		**1,200,000**	**0**	**0**	**0**	**0**

Area-Wide

	1410	Administration			1,075,000	1,075,000	1,075,000	1,075,000	1,075,000
		Security Improvements			1,200,000	0	0	0	0
	1460	Building Systems Upgrades			500,000	1,080,000	650,000	475,000	495,000
					2,775,000	**2,155,000**	**1,725,000**	**1,550,000**	**1,570,000**
		GRAND TOTAL	**803**	**5,923**	**14,460,000**	**9,395,000**	**6,495,000**	**8,980,000**	**8,715,000**

Asset Preservation Strategies

The ever-widening gap between capital improvement needs and the dollars allocated to MPHA through HUD's Capital Fund Program has prompted MPHA to develop multiple asset preservation strategies. These include the following:

A) Participating in special programs offered by HUD.

B) Implementation of development/asset replacement strategies.

C) Seeking funding opportunities other than HUD's Capital Fund Program.

A. Preserving Assets though HUD Programs

Moving to Work (MTW) Demonstration Program

MPHA's designation as a High Performing Housing Authority by HUD provided the opportunity to obtain the MTW designation. The purpose of the MTW program is to give housing authorities and HUD the flexibility to design and test various approaches for providing and administering housing assistance that accomplishes three primary goals:

- Reduce costs and achieve greater efficiencies in federal expenditures.
- Give incentives to families with children where the head of household is working, seeking work, or preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- Increase housing choices for low-income families.

As an MTW agency, MPHA has been able to utilize fungible authority to increase the amount of funds allocated to capital improvements above the CFP allocation from HUD. In 2014, MPHA allocated an additional $3 million to its capital improvement program above the HUD capital grant fund.

Energy Performance Contracting

MPHA contracted Honeywell International, Inc. for a 2010 implementation of $33.6 million of energy conservation measures throughout MPHA's properties. The contract was financed under HUD's Energy Performance Contracting program incentive to borrow private capital to fund energy improvements. The improvements which included replacing 40-to-50-year-old boilers, installing low flow toilets and shower heads, and replacing

existing stoves with energy efficient models is now completed. This “green” project is now complete and on its fourth year of a 20 year energy savings guarantee by Honeywell.

The project is truly a win-win for the agency. As MPHA and Honeywell transitioned from construction to energy savings monitoring, other savings and improvement opportunities were discovered. The original loan was refinanced to a lower interest rate and an additional $3.36 million worth of improvements is now underway. These include enhanced LED lighting at all MPHA high-rise sites as well as mechanical upgrades to high rise HVAC systems for even more efficient operation.

Typical Old Highrise Boiler

New Boiler Installation

B. Asset Redevelopment & Repositioning

MPHA looks for opportunities to reposition some of its single-family scattered housing properties with the most extensive capital, operational and maintenance needs and replace these with small clusters of town house developments. A prototype example of a small cluster of family housing is the development of a five unit townhome development in Linden Hills that was completed in 2006.

MPHA is also in the early planning stages of the complete redevelopment of its Glendale Townhomes in Prospect Park. This 14.5 acre site with 184 family townhome units offers a unique opportunity for redevelopment, a higher density, mixed income/use and state of the art green redevelopment. MPHA has submitted to HUD a Rental Assistance Demonstration (RAD) application for the redevelopment of the public housing units at this site.

Five Unit Townhome Development in Linden Hills

C. Supplemental Funding Sources

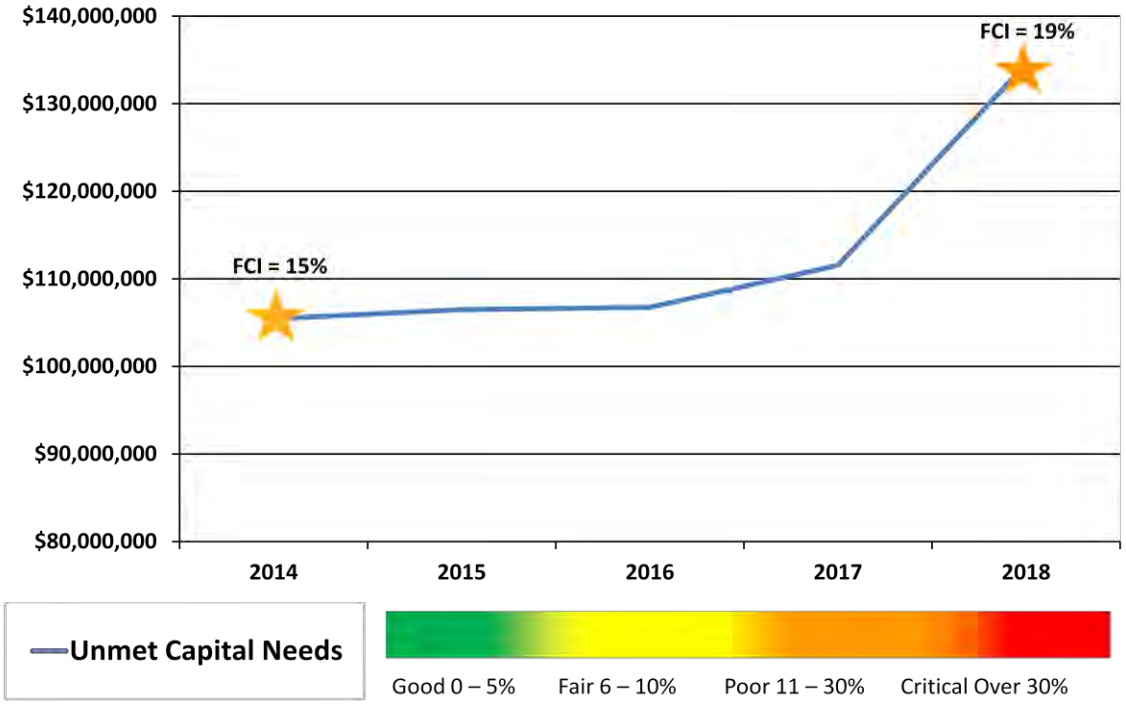
Due to the extent of MPHA's capital needs and the insufficient level of funding provided by HUD, the need to cobble funds from various sources outside the traditional HUD's CFP has become a much needed activity. In the past, MPHA has been successful in securing grants from the Met Council and the City in redevelopment activities and from the State for affordable housing preservation. For example, MPHA secured a $600,000 affordable housing preservation grant from the State in 2013 to help fund major plumbing replacement at its 600 18th Avenue North site.

MPHA is applying for supplemental funding for 2015 from the City of Minneapolis and from the State. If awarded the $4.2 million request, funds from the City will be allocated to major plumbing replacement in AMP 6 at the Cedars low-rises. Funds from the State for the affordable housing preservation grant will be allocated to other similar, high priority capital projects for 2015.

Facility Condition Index

MPHA assesses the physical condition and tracks the performance of our properties by utilizing an industry-accepted tool known as the Facility Condition Index (FCI). The FCI is used by industries that have responsibility over large capital asset inventories such as higher education, municipalities, military, and increasingly, public housing authorities. The FCI is a measurement that takes into account the "growing" capital renewal needs year over year and measures it against the replacement value of an asset (FCI = Need/Asset Value). MPHA uses this information to understand the current state of each property, to forecast a building's future performance based on various funding levels, and to formulate asset preservation strategies such as those mentioned above that will keep our housing stock viable for the long term.

MPHA's five-year strategy for addressing capital needs covers FY 15 through FY 19. Through Capital Fund Program appropriations and asset preservation strategies, MPHA anticipates allocating approximately $65 million to implement capital work over this five-year period. The plan addresses primarily building systems, security and fire suppression improvements (Classes 1 and 2), all of which are critical to the operation of our facilities. The following chart illustrates MPHA's Facility Condition Index for the next five years.



Assuming current HUD Capital funding levels and MPHA's ability to implement various asset management strategies, MPHA's assets will continue to be in the "Poor" range over the next five years. Aging properties and reductions in funding levels have made asset preservation an increasingly difficult challenge. MPHA must continue to aggressively pursue grant opportunities that improve MPHA's asset condition through initiatives that include development and capital investment in existing assets.

MPHA considers the outcome of the aforementioned investment strategies consistent with the MTW statutory objectives of:

(a) Reducing costs and achieving greater cost effectiveness in Federal expenditures.
(b) Providing incentives to families with children whose heads of household are working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.
(c) Increasing housing choices for low-income families.

APPENDIX B: COMMENTS AND RESPONSES - FY2015 DRAFT MTW PLAN AND SUPPORTING DOCUMENTS

Draft 2015 MTW Plan Comments

1. In regards to the Families Out of Shelter Initiative, if there is a five year limit is MPHA just going to leave them? Who is MPHA partnering with besides Hennepin County to prepare these families? If I were to design this program I would say that you need to have highrise or townhomes, a day care facility, and some job training and schooling. Also, many jobs are outside of the City.
2.

MPHA Response: ***MPHA is partnering with Hennepin County in this effort and there will be services Agreements between Hennepin County and its various providers that will support families in this program. MPHA and Hennepin County will monitor the progress of families and depending on success of the program, housing alternatives available and the needs of the families, will look at housing options after the first few years and if needed, recommend changes to the MTW plan to address housing needs of participating families.***

3. There is an urgent need for transitional housing -- especially for victims of domestic violence or those coming out of drug/alcohol treatment programs or correctional facilities.

MPHA Response: ***Thank you for the comment, MPHA does not currently have transitional housing for victims of domestic violence or the others mentioned in this comment, but will consider it as a part of future plans. Through its POTH Program, MPHA established two Shelters for Women experiencing domestic violence and a transitional housing program for women in recovery from chemical addiction.***

4. I have a concern about the Shelter to Housing Initiative and the five year time limit. A lot depends on the worker assigned to them and what skills they have. This makes a difference in how successful the family will be. Once the five year time limit expires, will they be offered a voucher or other assistance finding a home?

MPHA Response: ***See response to #1 above***

5. Whenever public housing is developed, don't forget the amenities and supportive services these families may need: transportation access, recreating/play-areas, lighting, curb cuts, etc.

MPHA Response: ***These amenities are very important and, depending on the type of public housing being developed, are included from the conceptual phase of program design.***

Capital Fund Comments

6. When doing roof repair on buildings, is there any possibility to install solar panels rather than shingles?

MPHA Response: ***MPHA is in the middle of the Honeywell Phase 1A contract, a second phase of the Energy Performance Contract (EPC). MPHA is looking at a few roof replacements under that contract that would have energy conservation components such as reflective color, additional insulation, etc. In new development, we include the consideration of more advanced Energy Conservation Measures (ECM) such as solar panels like those that were installed at Thomas T. Feeney Manor.***

7. Explore finding resources for expanded "green technology applications" when doing roof work. Any funding for "green technology"? Solar panels, reflective covering, wind turbines on tower roof?

MPHA Response: ***See answer to Question 5.***

8. Where are the sprinkler systems installed in the buildings?

MPHA Response: ***The current fire code requires MPHA, whenever we are doing major modernization, to put sprinkler systems throughout the entire building (in the apartments, hallways, boiler room, etc.). They are installed throughout the building as required by State fire code.***

9. I have a concern regarding the sensitivity of the sprinkler systems being installed in the highrises. If we burn a piece of toast will that set off the sprinklers and pour 15 - 16 gallons of water in our unit.

MPHA Response: ***Burning a piece of toast will not activate the sprinkler system. The system is activated by excessive heat and high temperatures (150+ degrees).***

10. When is MPHA going to begin work on 1710 Plymouth to repair commons areas, elevators, roofs, etc.?

MPHA Response: ***MPHA has set aside funds to make some common area improvements before the end of this year. Some of this work is already in progress. The major project is funded over a two year span (2015-16) and will be implemented as funds are disbursed by HUD.***

11. What about funding sources for wireless broadband access for large/tower public housing complex populations like Horn Towers, the Cedars, Hiawatha's, Eliot Twins, 1815 Central, etc.?

MPHA Response: ***MPHA has not been able to secure additional funding specifically for wireless broadband access (Wi-Fi). The City of Minneapolis has (as part of the City's wireless initiative) provided limited funding to establish Wi-Fi in some of the MPHA buildings only in Community rooms. This is to provide a training facility for residents to participate in learning with use of technology. This is also part of the initiative to address the digital divide gap.***

12. ALL public housing needs "zero waste" re-cycling/re-use/re-purpose strategy! Re-cycling bins, e-cycle containers, trash/garbage dumpsters, haz-mat container, yard waste disposal plan and rainwater collection and storage for irrigation plans.

MPHA Response: ***MPHA has worked to increase recycling in the Horn AMP for which it won a NAHRO National Award of Merit, and will roll out a similar program in 2015 in the Northeast AMP. Having less waste is an important goal for MPHA and the City of Minneapolis.***

Low-Income Public Housing Comments

13. I live at 1314 - 44th Avenue North and I am a member of the Minneapolis Highrise Active Living Program Committee. We are working with the Minneapolis Health Department and other partners to encourage active living for highrise residents. We are focusing on exercise, walking and community vegetable gardening. One of the things we have been hearing is that residents want exercise equipment in their buildings, but space for the equipment and equipment maintenance are often the problem. The Committee is working on recommendations for appropriate equipment for resident councils to buy and exploring the possibility of an umbrella maintenance policy that resident councils could buy into . We ask the MPHA's support by designating areas within the highrises for exercise equipment when modernization plans are being developed. Thank you.

MPHA Response: ***MPHA loves the idea of healthy living. We have a long history of supporting healthy living activities. We favor all highrises having venues to participate in healthy living activities. Unfortunately not all of our buildings are amenable to house site based equipment. We are working with the Y and other organizations including MHRC to create transportation options where all residents can access facilities that provide equipment and programming that support healthy living.***

14. In regards to the Earned Income Disregard, when a resident is out of work how does MPHA deduct the loss income? Can the resident get back on the program when he/she returns to work?

MPHA Response: ***Under the Earned Income Disregard, if you get a job your household income would be disregarded for up to two years. MPHA gives you a straight two year disregard, so if you lose your job and get another during that two years, your income would still be disregarded until the end of the two years.***

15. I am on SSI and if I go abroad more than one month, I lose my income and have zero income. Since we are paying rent on 30% of income with zero income, I should not be charged. However, minimum rent of $75 may be chosen and may be divided in installments. In such cases where a residents stays out more than one month are very few - hardly 10 cases in a year. How much will rent be affected? Hardly $2,000, so why keep this policy? It is a minor effect a year and it could easily be rescinded.

MPHA Response: ***MPHA has over 18,000 persons on its various waiting lists. Our Section 8 Voucher program is 100% utilized and our Public housing occupancy rate is approximately 99%. Minneapolis has a very low overall rental housing vacancy rate and an***

almost non-existent vacancy rate for very low-income persons. Given the critical increase in the homeless population, the high demand for public housing , the major cuts to programs for the poor and the increased focus on accountability for use of housing resources, MPHA was faced with new challenges concerning these issues.

MPHA Board members became aware of an increasing number of residents who for any number of reasons were leaving their units vacant for months at a time, leaving jobs and/or losing income during these long absences that resulted in units be vacant and increased federal resources subsidizing the rents for these vacant units. The Board felt that huge waiting lists and units left vacant for long periods of time and additional subsidies to residents who chose to be away from their units was not good public policy. The Board asked staff to recommend policies which would minimize long term vacancies and limit subsidizing the absences.

MPHA staff initially recommended limiting absences to no more than 60 days and requiring tenants to pay their full rents for the times that they were absent. This recommendation raised significant concerns from both individual residents and resident groups. Especially a number of immigrant populations who had limited opportunities to return to their homes, visit families who lived in far away countries and where travel was timely and difficult. Many of these residents also were subject to loss of income when they left the United States.

Given these realities, MPHA recognized that a 60 day limit on travel and a demand for full rent during the time of absences may cause undue hardship for some residents and that the policy it was pursing needed to be responsive to the concerns raised by the affected residents.

Staff amended its recommendations to the Board in a way that it believed struck a balance between the public policy objectives of the Board and the unique circumstances of the residents. The Policy recommendation was to allow for 90 day absences (one quarter of a year). It also permitted a resident who would be absent for that period of time to request a hardship where the rent could be reduced to the minimum rent of $75 per month with the understanding when the resident returned to the unit and the income to the resident was restored, the resident would enter into a repayment agreement to pay back the amount of rent that would have been paid during the absence. MPHA would allow up to two years for the resident to repay the rent.

This recommendation approved by the Board of Commissioners allows residents to travel, have a very limited rent burden while they are absent from the unit and then to have only a modest increase in rent upon their return.

16. It is an expense for residents traveling out of country as they lose income and it is not restored when they return, but they still must repay full rent when they return.

MPHA Response: ***Please see response to #14 above.***

17. I would like MPHA to rescind the Absence from Unit Initiative. It is a burden to have to pay full rent while absent. Our income is limited or there is none so there is no way to pay back the rent. I request that MPHA reconsider this initiative.

MPHA Response: ***Please see response to #14 above.***

18. Still a grave concern about out-of-unit/out-of-country policy. Minimum rent $75.00 is acceptable. Full rent, in the face of total loss of all income, is not! This is an arbitrary and needlessly cruel hardship.

MPHA Response: ***Please see response to #14 above.***

19. It is very important to have a professional security presence on site when considering security budgets and issues.

MPHA Response: ***MPHA has been severely impacted by the loss of funding on both the Federal and Local level. Prior to 2012, the City of Minneapolis provided $1.2 million from a Minneapolis tax levy which was earmarked for security. MPHA has also lost millions in Federal funding and, as such, difficult decisions were made. MPHA reduced staffing by 24 positions and guard services by over 50°/o. We have just begun to install new security cameras and have established a "central command center" to monitor those upgraded cameras and respond, as needed, to incidents as they occur either by calling the police or dispatching a mobile security guard. We continue to provide security guard access control to many of the large buildings, but, as noted, are spending less than half the funds of earlier years. MPHA is committed to resident security and will continue to provide as much security as possible given our budget constraints.***

We have requested an increase in security guards in our 2015 budget but it will not be what we had before when we had $2.4 million a year for security guards. Our goal is to make better and more efficient use roving guards in vehicles, staffing the Command Center, monitor cameras in the highrises and respond as needs are identified.

20. "Smoke-free" policy a broad over-reach and raises serious constitutional questions -- particularly 1st Amendment issues of "free exercise of religion" due to inclusion of incense in the ban. Furthermore, MPHA is now using the "Smoke-Free Policy" as a pretext to commit yet another constitutional violation - a 4th amendment illegal "search and seizure" through random inspections during which they photograph and/or videotape whatever, whenever in a tenant's unit they may choose.

MPHA Response: ***MPHA has a compelling interest to develop safeguards and promote strategies that contribute to the health of residents, staff and other persons in the buildings which it owns and operates on behalf of the government. MPHA has been encouraged by HUD to develop and implement 'smoke free' strategies and believes that its smoke free policy is legally permissible.***

21. MPHA property managers could do a far better job of allocating resident "self-help stipends" to enhance routine maintenance services.

MPHA Response: ***MPHA allocates the self help funding to each building and property managers look for residents who want to participate. Resident who are interested in participating in the Self Help Program should contact their property manager.***

Section 8 HCV Comments

22. Is it possible to apply for Section 8? If a person has been on the list since 2005, they need to just wait?

MPHA Response: ***In response to the first part of your question, in order to get a Section 8 voucher you need to apply when the waiting list is open. MPHA currently has over 9,000 people on our waiting list and it will be quite a long time before the Minneapolis list opens once again. There are a number of other housing authorities in the Metro Area who open their waiting lists at different times. MPHA recommends that you go to HousingLink at*** *www.housinglink.org* ***. This free online housing resources not only posts information about housing authorities that have opening in their waiting lists but also publishes listing of current rental vacancies in the metro area. As to your second question, if you have been on MPHA's waiting list since 2005, MPHA***

would encourage you to call (612) 342-1400 and follow the phone prompts to determine if you are still on the Section 8 waiting list. If your contact information has changes since your application, please contact MPHA and request an Application Update Form.

23. In regards to the change in policy regarding the VASH vouchers if the Veteran leaves the household, it seems counterproductive to make a family homeless if the veteran leaves when you are working to house homeless families. You should offer a continuation of the voucher or actively work with the family through project based or another program to find housing. What are you doing for those families?

MPHA Response: ***MPHA has operated a VASH Program since 2010 and encountered two situations where the veteran has left the household. We attempted to allow the family to hold the voucher, but discovered that this was impermissible. Under the VASH program a VASH Voucher cannot be in use without a qualifying head of household (a veteran referred to MPHA by the Veteran's Administration. When MPHA find that the veteran has left the household, we work with those families to place them in our project based communities. Our goal is to assist those families however we can. In working with the family, we are required to stay within the confines of the policies under VASH and that is the head of household must be a Veteran. As note we do try to work with the families in these cases to place them so they are not homeless.***

24. I find the change to the Section 8 HCV Admin Plan regarding removing the offer of the voucher to the family if the Veteran vacates the unit to be arbitrary and needlessly harsh. This should be considered on a case-by-case basis.

MPHA Response: ***See Response to # 22 Above.***

25. If a resident wants to move to another state, will their housing transfer there?

MPHA Response: ***Under the Section 8 HCV program you have an opportunity to 'port' based on Rent Reform portability criteria; that process can be explained by your Eligibility Technician. Public housing residents do not have the opportunity to transfer to another state.***

26. Is there a faster way for veterans to get into housing?

MPHA Response: ***MPHA maintains a Waiting List Preference, for Veterans, in both its Public Housing and Section 8 HCV Programs' admission criteria. Further, if you are a veteran who is homeless or is in fear of being homeless, and in need of rental assistance, please contact the Minneapolis VA Medical Center at 612-313-3248. MPHA and the Veterans Administration partner together in a commitment to house and serve homeless Veterans. MPHA operates the HUD-VASH program, which provides rental assistance for chronically homeless veterans and their families, while the Minneapolis Veterans Administration provides case management and clinical services at its medical facilities. Veterans are referred to MPHA by the Minneapolis Veterans Administration.***

27. Thanks for inviting me to the Advance Meeting. There were many Section 8 questions. Why don't we have a Section 8 resident committee or gatherings?

MPHA Response: ***MPHA has invited and encouraged Section 8 HCV participants to be a part of and involved in the various committees that work with MPHA such as the Tenant Advisory Committee and the Resident Advisory Board. As participants do not have a common landlord, the same lease based interest as public housing residents and do not have a ready community of participants as public housing residents have with each other, getting HCV participants to meet, work together and participate has not be successful. Many of Section 8 HCV participants get involved with their Neighborhood Organization and through other community groups. MPHA always welcomes Section 8 HCV participants to become involved in activities that involve their relationship with MPHA but has not been successful in making this happen.***

28. I am 59 and every year on Section 8, I have to come in for review. I am on SSDI so have fewer changes in my life. I have not skipped to every three years like Bob Boyd stated, older people meet with ET every three years. it has not happened yet for me.

MPHA Response: ***MPHA's Public Housing Program adopted the initiative but MPHA's Section 8 Program has not adopted the Initiative at this time.***

29. Minneapolis Community Planning and Economic Development (MCPED) requests that MPHA exclude the rental HOME program as being exempt from the Moving to Work (MTW) minimum rent and also, the Rent Reform Initiative for project based developments. Certain specified HUD Community Planning and Development programs, Supportive Housing Program (SHP) and the Housing Opportunities for Persons with AIDS (HOPWA) program, already are exempt from MTW minimum rent and they also are exempt from the Rent Reform Initiative.

MPHA Response: ***MPHA recognizes that its Section 8 HCV Project Based partners have multiple funding sources from various HUD and other federal and state programs that may put limits on rent, which residents who live in the developments funded through those sources, pay.***

MPHA understands that its HCV project based partners must be in compliance not only with its program requirements, but those of other funding sources and will take action to waive the MTW requirements related to Rent Reform and Minimum rent for all units where MPHA has project based its vouchers. If approved by the MPHA Board of Commissioners, this action will be effective on January 1, 2015.

Other Comments

30. What is Moving To Work? Why did MPHA go there?

MPHA Response: **Moving to Work (MTW) is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally-designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. MTW gives PHAs exemptions from many existing public housing and voucher rules and more flexibility with how they use their Federal funds. There are currently 39 MTW Agencies in the United States.**

31. Moving To Work title is or can be misleading and confusing because it makes us think you want to get all MPHA residents and Section 8 participants ready for Moving To Work.

MPHA Response: ***The Name of the Moving To Work Program is confusing; however, Congress identified "Moving To Work" as the name of the program as it enacted it into law.***

32. How does Moving To Work title include elderly and disabled people who may be unable to Move To Work?

MPHA Response: ***See response to #29 and #30 above.***

33. When will MPHA/Section 8 have more of a internet, (i.e., Facebook) presence for comments and questions and suggestions? I have so many questions still about the presentation yesterday. It seems things move quickly, how can some of us move along with changes.

MPHA Response: ***MPHA's Web Site www.mphaonline.org has a field for comments. Click on 'Contact Us' and it will take you to the comments section. The Agency is also exploring the use of other social media as part of its future activities.***

34. The City needs to fully fund and restore the MPHA $1.4 Million tax levy/pilot program - which MPHA historically purposed to cover our costly/critical security needs.

MPHA Response: ***Thank you for your comment. Restoring our Tax Levy would be very helpful to MPHA.***

35. MPHA could also reduce contracting costs by increasing a Section 3 component for all projects in and for public housing.

MPHA Response: ***MPHA follows HUD requirements for all bids. While we encourage Section 3 vendors to participate in our bids, bid awards are required to be awarded based on the lowest cost submitted. So a Section 3 vendor still needs to be the lowest cost bidder to receive any bid award.***

36. Complete the #394 - W link off the southerly extension of Van White Memorial Blvd. Especially, the blocks just North and South, crossing Glenwood. Also, still no signage anywhere on Van White or Glenwood the link is even there!

MPHA Response: ***Thank you for your comments. The needs you identified are in the City of Minneapolis' prevue and we have forwarded the comments to the City.***

37. Citizen/Resident Participation Processes -- City/County/State/Federal Governments and Agencies are in urgent need of a Paradigm shift. They need to stop working AT us/To us/FOR us and begin finally to work FROM us and WITH us! For far too long we have suffocated in an adversarial US vs. THEM atmosphere, rather than a WE and OUR partnership. The first consolidated Plan Objective is to "support citizen participation processes that facilitate community input into ALL PHASES of -- Plan development and implementation -- especially low-income residents who are the primary clients for HUD programs (P.4). The Resident Review and Participation Process is the same for the MPHA MTW Plan. Instead of this kind of inclusion, we are left to comment (after the fact) on a Draft Plan developed by others (without our input) and allowed two minutes to speak at a hearing and a narrow window for written comments, often without timely access to relevant documents/materials. This process exemplifies EXCLUSION - NOT INCLUSION!

MPHA Response: ***Thank you for your comments. However MPHA disagrees with your assertions about resident participation in the MTW Plan. The Resident Advisory Board (RAB) met numerous times prior to and after the publication of the Draft MTW Plan and adopted their Priorities and Guiding Principles which are included in the MTW Plan. RAB was asked for and encouraged to provide other ideas and or guidance to MPHA prior to the Draft Plan. Once the Draft Plan was presented to RAB, it was also published on the MPHA Website, copied and sent to all building Resident Council presidents, to MHRC Executive Committee and the Scattered Site and Glendale Resident Councils. Every Public Housing resident received notice of the Advance Meeting and Public Hearing in their rent statements and were invited to share their comments on the Draft MTW plan by e-mail to MPHA's Policy and Special Initiatives Department. MHRC published notice of the Advance Meeting and Public Hearing in the Highrise Lowdown a publication that goes to 5000 highrise residents. MHPA provided a lunch to all residents and participants who attended the Advance Meeting, solicited and responded to any and all questions from residents and participants at the Advance Meeting. MPHA also provided comments sheets in the Advance Meeting packets for residents and participants who did not have enough time to comment on all their concerns or who were more comfortable in addressing their concerns and offering their ideas***

in written form. As evidenced by this Comments and Responses document, MPHA responds in writing to all comments related to the MTW Plan and supporting documents.

38. MPHA and Heritage Park need to partner a lot better. The entire 82 acre development lacks suitable/safe recreational/play areas for all of the kids who live here too!

MPHA Response: ***The Near Northside Master Plan which created Heritage Park was primarily focused on housing. However the development still includes children's tot lots for each cluster of housing, two parks (Sumner Field and South Park) which have water features, walking and bike paths as well as recreational areas. Heritage Park is located immediately adjacent to a public library and an elementary school as well as near numerous services and support organizations.***

Minneapolis Highrise Representative Council (MHRC) Comments

Regarding proposed MTW activities:

39. Residents support the proposed Shelter to Housing Initiative that could result in up to 30 to 50 additional units of transitional public housing for families coming out of homeless shelters in the first five years of the program. We also wish to stress the importance of leveraging onsite support services including job training, and counseling services to help increase the chance of successful transitions to other housing after the 5-year limit.

MPHA Response: ***See MPHA response #1.***

Regarding proposed changes to the Public Housing Statement of Polices:

40. Residents appreciate that MPHA has recognized the extreme financial burden an increase in minimum rent would place on many residents whose only source of income is General Assistance, and that MPHA is proposing to not increase the minimum rent above $75 a month.

MPHA Response: ***Thank you for your comments. MPHA is keenly aware of the economic challenges faced by residents.***

41. Many residents continue to request that MPHA rescind the previously adopted "Absence from Unit Initiative" which disallows rent adjustment during extended absences even when income is lost during this period. The MHRC continues to believe that this policy does not in any measurable way improve MPHA's financial situation but that it does cause undue financial hardship for public housing residents, and almost exclusively to residents who are immigrants and refugees. Up until the time MPHA was granted the "Absence from Unit" waiver from HUD, HUD intended that residents would pay only 30% of their income in rent and that the amount would vary based on fluctuations in income. We request that MPHA return to this policy whether a resident is at home or away from home.

MPHA Response: ***See MPHA response #14.***

42. Regarding MPHA's smoke-free buildings initiative, residents request that MPHA consult with resident councils when designating outside smoking areas and that these areas be in safe and well-lit locations.

MPHA Response: ***MPHA Agrees. Thank you for your comment.***

43. Regarding Tenant Grievance Procedures and the selection of hearing panel members, residents appreciate that MPHA has added new language to their SOP which addresses the HUD requirement of resident input in this area. An ad hoc committee of MPHA legal and property management staff, staff from MHRC and residents from MHRC's Maintenance, Modernization and Management committee has already held several productive meetings and has developed procedures for resident input into selecting hearing panel members and improving the functioning of the hearing panels. Thank you for your partnership on this.

MPHA Response: ***Thank you for your comment. MPHA appreciates the partnership it has with its residents.***

44. Residents are in strong agreement with the Resident Advisory Board that security continues to be the number one priority for highrise residents, including improving relationships with the MPD, pursuing improvements in security technology, increasing guard coverage in some buildings and funding for Project Lookout. As you may know, Project Lookout volunteers have helped to stave off crime and other security problems since the major guard cuts three years ago. They now contribute over 60,000 hours of volunteer security service in 29 highrises a year. It is critical that we support this essential program.

MPHA Response: ***Thank you for your comment. MPHA is very appreciative that residents have stepped up and increased their volunteer hours for Project Lookout. MPHA continues to support Project Lookout both financially and through our security partnerships.***

45. Many residents have identified as a significant concern and a challenge to harmony in the buildings, a lack of support for residents who are experiencing deteriorating mental health or even mental health crises. We recommend that MPHA form an ad hoc committee of resident leaders, staff from MPHA, VOAMN and outside mental health professionals to work on this issue.

MPHA Response: ***MPHA has experienced similar challenges and will form an ad hoc committee similar to what is suggested in MHRC's comment.***

46. Many residents continue to feel frustrated by the ongoing problem of bedbug infestation in many highrises. We understand that MPHA is finishing the process of hiring its own staff to combat this problem and that there will be a more systematic way of doing pest control. Effective two-way communication between residents and management is critical to successfully addressing this issue, and other issues, and the MHRC is committed to working with MPHA towards this goal.

MPHA Response: ***MPHA recognizes that infestations, especially bed bugs, are a huge issue for MPHA and its residents. MPHA has adopted an Integrated Pest Management Plan and is working toward hiring staff to provide the vast majority of the infestation control services.*** **MPHA is increasing from two to five our pest control staff technicians. One technician will be dedicated to each highrise AMP and will be responsible for inspecting, placing monitors, applying pest control chemicals and conducting heat treatments. This method will allow us to follow up on apartments where infestation have been identified. In addition, w*hile MPHA has invested heavily in responding to the bed bud issues and will be increasing resources in 2015, we recognize the enormity of the challenges and will be taking action to engage residents and resident leadership to deal with this matter in a more comprehensive manner.***

Regarding Planned Physical Improvements in the Capital Fund Program

47. Residents recognize that the vast majority of limited capital improvement dollars must go toward maintaining and repairing critical building systems. As the limited work of rehab of common areas progresses, and in sites where this work is not occurring, residents request that MPHA be mindful of the need for space in the highrise for exercise equipment. Many residents are

focused on optimizing their health and areas for exercise in the buildings, especially in the winter months, is in high demand. Residents appreciate the professionalism of facilities and development staff working in their buildings. We request that facilities and development staff utilize resident councils – the official resident voices in the highrises- as the vehicle for resident input as this work progresses in the coming year and as staff complete the next assessment of capital needs.

MPHA Response: ***Thank you. Facilities & Development staff work closely with property management and residents in planning and implementing all Capital work. When reconfiguring and remodeling shared tenant spaces, F&D staff considers the input they receive [from property management and building resident councils] along with the space available and try to meet needs/desires when feasible.***

LEGAL AID COMMENTS

DRAFT FY2015 ANNUAL MOVING TO WORK PLAN ("MTW PLAN")

48. HUD issued PIH 2014-20 on August 20, 2014 regarding how to comply with the Equal Access to Housing in HUD Housing Programs Regardless of Sexual Orientation or Gender Identity Rule. Agencies covered by this Notice include MTW agencies like the MPHA. The MPHA must make all revisions to its MTW Plan required by the terms of the Notice, with particular attention to issues of eligibility, selection and admissions.

MPHA Response: ***MPHA has a long history of not discriminating against a person in a protected class or based upon sexual orientation or gender identity. MPHA's policies, practices, procedures and protocols are in compliance.***

49. Strategic Direction 2, MTW Plan, p. 10, for maximizing the effective use of the MPHA's Section 8 Vouchers fails to include any Fair Housing goal. The Goals should be revised to include Fair Housing principles among the Goals.

MPHA Response: ***Thank you for your comment. MPHA will review its goals and take action as appropriate.***

50. The MPHA has recognized the need to expand the geographical areas in which a participant can use her Section 8 Housing Choice Mobility Voucher to include the non-concentrated areas of the 7 county metropolitan area, thus ending the limitation of use in only non-concentrated areas of Minneapolis. MTW Plan, p. 7. According to the MPHA, the move to non-concentrated areas is required in the Section 8 HCV Mobility Program to break the cycle of poverty and respond to HUD's goal of deconcentrating poverty. The MPHA states that "In January, 2014 with the advent of Rent Reform, MVP participants faced even greater challenges in locating and maintaining affordable units in areas of Minneapolis that were not concentrated by poverty." MTW Plan, p. 63. Despite the MPHA's statements recognizing the difficulty of locating housing to rent with a Section 8 Housing Choice Voucher within Minneapolis in non-concentrated communities of opportunity, the MPHA Rent Reform Initiative continues to restrict the use of Section 8 vouchers to Minneapolis. MTW Plan p. 28 and Section 8 Admin Plan, p. 10-8, 10-II.B. The MPHA is encouraging integrative moves for a small group of its Housing Choice Voucher participants while prohibiting integrative moves and restricting housing choice of thousands of Housing Choice Voucher participants. The Rent Reform prohibition on porting must be revised in order to meet the goal of deconcentrating poverty and to comply with the Fair Housing Act.

MPHA Response: ***Eligibility criteria and admission to the Mobility Program is specific to applicants/participants who agree to move to, and to maintain housing in non-concentrated areas. On the other hand, HCV applicants/participants are encouraged -- but not required to move to non-concentrated areas, thus they retain more choice.***

51. There is nothing in the MPHA's MTW Plan about how MPHA will actively participate in the Minnesota Olmstead Plan ("MN Olmstead Plan") submitted to Federal District Court in November 2013. The Minnesota Olmstead Plan documents how Minnesota will provide services to individual Minnesotans with disabilities in the most integrated setting appropriate to the individual. The affordable housing resources that the MPHA has to contribute to help meet the housing needs of disabled Minnesotans served by the Minnesota Olmstead Plan make essential the MPHA's participation as a partner with the MN Olmstead Subcabinet, including the MN Housing Finance Agency and the Department of Human Services and others. If the MPHA is participating in Olmstead planning that participation should be described in the MTW Plan and other MPHA planning documents.

MPHA Response: ***MPHA does not discriminate against disabled persons. MPHA believes it houses the disabled in an integrated setting. In this regard we have similar goals.***

52. The MPHA's MTW Plan should recognize and incorporate the goals of federal and local changes in housing and services under the MN Olmstead Plan to guarantee the MPHA also is delivering its resources to people with disabilities in truly integrated settings. Many of the people with disabilities affected by the MN Olmstead Plan are already in MPHA housing. Many others covered by the MN Olmstead Plan are eligible to apply for the housing programs the MPHA currently offers and plans to offer in the future. The MPHA policies, practices and programs should be aligned with the goals of the Minnesota Olmstead Plan and expressly state how those goals are incorporated in the MTW Plan. This alignment with Olmstead should be expressly evident throughout the MTW Plan, including but not limited to Strategic Directions 3 and 4, MTW Plan, pp. 10-11; plans for additional project-based Vouchers, MTW Plan, pp. 14-16; plans for developing new family stock, MTW Plan, p. 22; Hennepin County Interim Housing Demonstration Initiative/Transitional Housing with Supportive Services, MTW Plan, p. 65.

MPHA Response: ***MPHA does not discriminate against disabled persons. MPHA believes it houses the disabled in an integrated setting. In this regard we have similar goals.***

53. The Plan, MTW Plan, p. 15, describes a project with Aeon for 15 Project-Based Vouchers. What is the address of this project?

MPHA Response: ***1920 and 1928 Portland Avenue South, Minneapolis, MN.***

54. The Plan refers to three buildings at which the MPHA has determined the units are hard to lease so 1 Bedroom units are offered first to current building residents in efficiency units based on length of residency in the efficiency unit, and new residents are offered leases for efficiencies only. What are the three buildings in which new strategies will be used to rent the efficiencies identified as hard to rent and what are all the strategies that the MPI-IA proposes to use to increase occupancy in those buildings? MTW Plan, pp. 18-19.

MPHA Response: ***MPHA is using this strategy at 1515 Park Ave and the Elliot Twins: 1225 S 8th St and 1212 S 9th St. Please refer to the MTW plan pp 18-19 for other strategies.***

55. The MTW Plan, pp. 19-21, describes the waiting list for Federal MTW Public Housing Units- Highrise as "Community-Wide". However, applicants who are neither elderly nor near-elderly are not provided with an application, but rather instead are given a pre-application. Those applicants who are neither elderly nor near-elderly, including disabled applicants

are told that their pre-applications are on a separate waiting list from which they are chosen when there are no elderly or near-elderly applicants to fill a vacant unit. This does not sound like a "community- wide" waiting list. The actual waiting list situation should be described accurately in this section.

MPHA Response: ***The MTW Plan Document created by HUD provides only two choices for PHAs to describe their Waiting Lists 'Community Wide' or 'Site Based'. MPHA does not have site based waiting lists other than for its specific MTW Lease-To-Own Program.***

56. The housing that the MPHA proposes building has units available to residents of Hennepin County family shelters would have a five-year time limit. MTW Plan, p. 24-25. The Resident Advisory Board specifically adopted as both a Guiding Principle and a Priority "No housing timelines." This program contradicts those points and says nothing about what housing exists or will be created to meet the needs of the participants in this program for permanent, affordable, decent safe and sanitary housing at the end of their five years with MPHA housing. What plans have been made for that transition at the end of 5 years after the family leaves the county shelter so "the MTW Statutory Objective of increasing Housing Choices", MTW Plan, p. 23, is met?

MPHA Response: ***The Resident Advisory Board (RAB), in consideration of its support for the Shelter to Home initiative, acknowledged that the five year limit was contrary to its Guiding Principles but recognized the exigent circumstances of homeless families and the limited resources of MPHA required that housing needed to have a turnover objective to be meaningful. RAB and MPHA will be evaluating the success and challenges of this program over the first few years and if required, will propose additional strategies to support families who participate in this program.***

57. The MPHA states it will do an annual evaluation of its HCV Rent Reform Initiative, MTW Plan, p. 32. The MPHA has eliminated both the Transition Waiver and Rent Caps components of Rent Reform included in its initial implementation, MTW Plan, p. 6. Will the annual evaluation include evaluation of the effect of the elimination of the Transition Waiver and the Rent Caps?

MPHA Response: ***MPHA will evaluate the impact of its Rent Reform Initiative using the HUD Metrics as illustrated in the MTW Plan.***

58. Will the annual evaluation include evaluation of the "turn back rate" for HCV Vouchers subject to Rent Reform to understand whether any HCV Vouchers have been returned to the MPHA because HCV participants were unable to place

their Vouchers under lease within the MPHA Section 8 Program's required deadline after Rent Reform?

MPHA Response: ***It is important to note that MPHA captures such circumstances as they occur and provides immediate assistance such as granting extensions of search time and approval of portability under our new policy. MPHA will evaluate the impact of its Rent Reform Initiative using the HUD Metrics illustrated in the MTW Plan.***

59. The MPHA states it has applied its Absence from Unit Initiative which affects rent calculation to only its Low Income Public Housing Program and not to its Section 8 Housing Choice Voucher Program because "Given the limitations on rent re-certifications in the Rent Reform, MPHA has evaluated this initiative and has determined it extraneous for its HCV Program." If the MPHA considers the Absence from Unit Initiative justified in Public Housing, the explanation given in the MTW Plan, p. 42, for not applying the same policy to the MPHA Section 8 Program needs clarification.

MPHA Response: ***MPHA's Section 8 HCV Program adopted the 90 day absence from unit time limit, but did not adopt the continued rent and repayment provisions of the initiative. The potential increase in administrative responsibilities, including tracking and monitoring repayment agreements, and making multiple adjustments to Housing Assistance Payments to property owners, would negate any savings we would gain in subsidy.***

60. The MPHA has finally acknowledged that the increase of minimum rent from $50 to $75 did not result in increased residents' self-sufficiency, a MTW Statutory Objective the MPHA previously used to justify the increased minimum rent of $75. MTW Plan, p. 49. It is especially disappointing that the action taken by the MPHA's in light of the MPHA's stated failure to increase self-sufficiency through the increased minimum rent is not to decrease the minimum rent to the previous $50 level. Instead the MPHA has simply deleted the objective it failed to meet from the Statutory Objectives listed for this MTW activity, leaving only "reduced costs" and "greater cost effectiveness in federal expenditures". What evidence is there in the MTW Plan that the increased minimum rent of $75 accomplishes either of the two remaining statutory objectives?

MPHA Response: ***Increasing minimum rent reduces federal subsidy.***

61. The MPHA describes the "Recertification of Elderly or Disabled Public Housing Residents Every 3 Years Instead of Annually" as a success for the MPHA and for residents, MTW Plan, p. 57. The MTW Plan, the definition of "Fixed Income", Statement of Policies, p. 13, and Part X Reexamination Of Tenant Eligibility And Rent Adjustments, Statement of Policies, pp. 50-54, should be revised to include among those with fixed incomes not burdened with unnecessary annual

recertifications those residents who receive Minnesota General Assistance of $203 based on disability while their applications for Social Security disability is pending. Minn. Stat. § 256D.Ol *et seq.* (2103). Those General Assistance recipients are receiving a public benefit income from a source that is fixed just like Social Security categories that the MPHA has included in its present meaning of fixed incomes.

***MPHA Response:* MPHA declines to make this change, in our experience General Assistance income is not as stable as the other forms of income described in the SOPs.**

62. The description of the Hennepin County Interim Housing Demonstration Initiative, MTW Plan, p. 65, indicates that the MPHA will provide up to 8 Public Housing units for the demonstration with the County providing all supportive services required by the residents. The MTW Plan also states that the County will provide a payment to the MPHA for the units in this demonstration. What will the County pay the MPHA? Is this payment in addition to the rent paid by the resident? At the end of the 4 month limit will the demonstration resident be allowed to remain as a MPHA Low Income Public Housing resident? Will the demonstration resident receive any preference on the waiting list or in the application process if s/he applies for Low Income Public Housing at the end of the 4 months of the demonstration?

***MPHA Response:* The County pays $535 per unit, their clients do not pay rent to MPHA. The Hennepin County clients will not remain in public housing after they leave the program unless they have applied as any other applicant. Currently, the clients do not receive a preference on the MPHA's waiting list, although MPHA is considering this idea.**

63. The MPHA presented its Rent Reform Initiative to the community and to Section 8 Voucher participants as necessary to prevent a reduction of 500 HCV households currently served. MTW Plan, p.26; FY 2014 MTW Plan, pp. 23-31; MPHA Section 8 Rent Reform Summary at http:1/www.mphaonline.org/assisted-living-minneapolis-twin-cities-housing/section-8-housing- minneapolis-twin-cities-metro/participants/rent-reform/. The MPHA explained that requiring everyone to undergo a rent restructure would be for the good for everyone in the Section 8 HCV Program. Now a year later, MPHA states that "Cost savings due to the HCV Rent Reform Initiative will free up HAP funding, which will be used to offset the subsidy loss in the Operating Fund Program." MTW Plan, p. 77. The funds from sacrifices the MPHA required of its HCV participants are being used to shore up the underfunding of MPHA's Public Housing. While a MTW agency may legally treat its funds as fungible, the MPHA's participants, residents and its community deserve more transparency than this before rather than after the fact.

MPHA Response: ***Since MPHA entered the MTW Program it has built its budgets using the funding flexibility permitted under the MTW Agreement. Historically, this has meant using some HCV resources to fund public housing due to severely insufficient federal funding for the public housing program. Sequestration further exacerbated this problem by significantly reducing Section 8 HCV funding in addition to underfunding public housing. Left in this predicament, MPHA was forced to reduce HCV program costs by either reducing the number of households served or implementing rent reform. The MPHA chose to implement rent reform rather than reduce the number of households served (which would in fact not be good for some households in the Section 8 program) and because of that action was able to continue to fund the public housing operating costs at approximately 90% of its need while continuing to serve the same number of households in both programs. To clarify this we will change the language on page 77 to read "Cost savings due to HCV Rent Reform Initiative will continue to free up HAP funding which will be used to offset the subsidy loss in the Operating Fund Program."***

64. The Resident Advisory Board (RAB) adopted as a Guiding Principle and a Priority the preservation of Section 8 vouchers for current participants. MTW Plan, p. 79. This Plan proposes the project-basing of 29 more Vouchers and states the MPHA's intent to look for further opportunities to project-base more Vouchers. Those Vouchers that are project-based are not available to current participants or those on the wait list seeking a tenant-based Housing Choice Voucher subsidy; and thus the MPHA's plans contravene the expressed Principle and Priority of the RAB.

MPHA Response: ***MPHA has not proposed any new project based initiatives in 2015. There may be PBV units that were approved in 2013/2014 that have not come under a HAP Contract at this time.***

65. The RAB adopted as a Priority "Section 8 participants need a forum/organization for representation." MTW Plan, p. 79. It does not appear that this Plan recognizes or responds to this resident priority at all.

MPHA Response: ***Though HCV Section 8 Participants do not have resident councils or associations, MPHA works to secure their participation on the Resident Advisory Board (RAB).***

66. The RAB adopted as a Priority "Provide more intensive pest control." MTW Plan, p. 79. It does not appear that this Plan recognizes or responds to this resident priority at all.

MPHA Response: ***See MPHA response #45***

67. The MTW Plan proposes that capital expenditures for scattered site housing be limited to roofs and other critical infrastructure upgrades. MTW Plan, p. 82. The MPHA states in this Plan that it will be taking every opportunity to replace its scattered site housing stock with units that are more easily maintained and managed by locating them in small groups. MTW Plan, pp. 8, 21-22. The residents of the MPHA's scattered site housing and the neighborhoods in which they are located are naturally concerned that maintenance of the scattered site stock not be limited as priorities shift to other housing stock.

MPHA Response: ***MPHA Facilities & Development staff work closely with scattered sites property management staff to identify properties that need major capital work and others that need more routine maintenance repairs. While MPHA is considering redevelopment opportunities for its scattered site inventory, we are committed to providing safe and decent housing and will dedicate resources accordingly. In 2010 MPHA received $11.6 million in ARRA funding for comprehensive improvements to its Scattered Site Portfolio. These funds were focused on making energy improvements and enhances to MPHA's scattered site properties.***

DRAFT FY2015 LOW INCOME PUBLIC HOUSING STATEMENT OF POLICIES ("SOP")

68. HUD issued PIH 2014-20 on August 20, 2014 regarding how to comply with the Equal Access to Housing in HUD Housing Programs Regardless of Sexual Orientation or Gender Identity Rule. Agencies covered by this Notice include MTW agencies like the MPHA. The MPHA must make all revisions to its SOP pursuant to the terms of the Notice, particularly regarding definitions of family, family composition and issues of eligibility, selection and admissions. Paragraph 4.c. of the Notice specifically directs revisions to MPHA's tenant selection policies. In addition, the Notice directs MPHA' s interactions with applicants and participants concerning issues covered by the Equal Access to Housing in I-IUD Programs Regardless of Sexual Orientation or Gender Identity Rule (77 F.R. 5662 (Feb. 3, 2012)). The MPHA must revise all of its Low Income Public Housing policies, practices, procedure and protocols, not just its SOP, to comply with the Notice.

MPHA Response: ***MPHA has a long history of not discriminating against a person in a protected class or based upon sexual orientation or gender identity. MPHA's policies, practices, procedures and protocols are in compliance. MPHA will include gender identity in its non-discrimination statement in the introduction to the Statement of Policies.***

69. The definition of "Affiliated Individual" for purposes of the violence Against Women Act (VAWA) should be added to "Part I Definitions", SOP, p. 2. It is insufficient to merely state that the MPHA will comply with law as that does not inform the community, applicants, resident and advocates of the meaning of this term of art, so just as the MPHA already has placed in the "Definitions" section the definitions of domestic violence, dating violence and stalking, so too should there be an entry for "Affiliated Individual". The definition used in the MPHA VAWA Policy, p. 98 should be used here.

MPHA Response: ***MPHA added the term to its definition section.***

70. The MPHA has added a definition of "Notice" as used in Section 4.D. of its Lease that limits the tenant's grievance rights. SOP, p. 18. The revised definition of "notice" is also proposed in the Informal Conference procedure section, SOP, p. 58, in which the MPHA's proposed language again attempts to limit the resident's grievance rights. These attempts to restrict the resident's rights must be deleted or revised to comply with the MPHA's obligations in 24 C.P.R. §§ 966.4 (b)(4), 966.53, 966.54 and 966.55 (2013). The MPHA must "assure that a PHA tenant is afforded an opportunity for a hearing if the tenant disputes within a reasonable time any PHA action or involving the tenant's lease with the PHA or PHA regulations which adversely affect the individual tenant's rights, duties welfare or status." (emphasis added) 24 C.P.R. § 960.50 (2013).

MPHA Response: ***HUD does not define the term Notice or reasonable. MPHA's definition of notice is reasonable and the tenant has a reasonable time to dispute.***

71. The definition of "Sexual Assault" for purposes of the violence Against Women Act (VAWA) should be added to "Part I Definitions", SOP, p. 19. It will not be sufficient to merely state that the MPHA will comply with law as that does not inform the community, applicants, resident and advocates of the meaning of this term of art, so just as the MPHA already has placed in the "Definitions" section the definitions of domestic violence, dating violence and stalking so too should there be an entry for "Sexual Assault". The definition used in the MPHA VAWA Policy, p. 99 should be used.

MPHA Response: ***MPHA added the term to its definition section.***

72. At p. 34 of the SOP the MPHA states it will offer a family unit at 20% of adjusted gross income ("AGI") where 5 applicants have declined the unit. At p. 44 of the SOP, MPHA has proposed a revision that states a rent of 20% of AGI will apply to Scattered Site units where 5 families have declined the unit. Either p. 34 must be revised to narrow the 20% AGI option to only Scattered Site units or p. 44 must be revised to broaden the 20% AGI option to all family units.

MPHA Response: ***Thank you for the comment. MPHA has made the change on page 34 of the Statement of Policies.***

73. The definition of Formal Repayment Agreement, SOP, p. 13, must be revised to comply with HUD's EIV instructions. The Agreement cannot be limited to 24 months. This limitation violates HUD Guidance establishing that the repayment time of a repayment agreement is based on monthly payment and the original retroactive rent amount. PIH 2010-19, extended in PIH 2013-23, '\116. In the same Paragraph HUD also establishes a limit on the monthly payments, stating that the retroactive rent payment plus the monthly rent cannot exceed 40% of the participant's adjusted gross income. This section of the SOP, and any other reference in the SOP to repayment agreements, including but not limited to SOP, pp. 41, 43, 80 and 82, must be revised to comply with HUD's EIV instructions.

MPHA Response: ***MPHA has the discretion to establish thresholds and policies for repayment agreements. MPHA's repayment agreement policies include HUD's minimum requirements and are in compliance.***

74. The SOP, p. 56, proposes that the MPHA will consult with the Minneapolis Highrise Representative Council ("MHRC") regarding a list of qualified hearing panel members. The SOP should be revised to also require the MPHA to consult with any other resident counsels that exist at Glendale Family housing and the Minneapolis Scattered Site Resident Council from which it drew MTW RAB membership. MTW Plan, p. 78. If the goal is to draw the broadest pool of qualified hearing panel members from the broadest input from residents, the MPHA would be wise to also consult the other resident advisory groups it has listed as sources for its RAB in the MTW Plan, p. 78: the Tenant Advisory Committee, the Security Advisory Committee, and the Maintenance, Modernization and Management Committee.

MPHA Response: ***All the referenced committees identified in this comment, with the exception of the Tenant Advisory Committee (TAC) are Committees of MHRC and most of the members of TAC are elected by MHRC Residents. MPHA's commitment to work with MHRC on this matter embraces all the members of the referenced committees and many other resident leaders who serve on the various resident councils and in other leadership positions.***

75. The MPHA proposes to remove its 30-day timeline for the MPHA to respond to a reasonable accommodation request with a decision, denial or determination of the need for more investigation. SOP, p. 63. The MPHA has not made any changes to remove any of the timing obligations the MPHA imposes upon the applicant or resident however. It is not onerous to ask the MPHA to at least review the request within 30 days and determine that more information is needed to make a decision to approve or deny the request. The lack of a timeline poses the risk that the request might go unanswered by the MPHA with serious and unintended consequences for the MPHA and the applicant/resident. Why is the MPHA proposing this change?

MPHA Response: ***MPHA will not make the proposed changes to this section of its reasonable accommodation policy except to include that MPHA will notify the tenant or the tenant's representative.***

76. The MPHA has changed the hearing process with is revision to Paragraph 6.a. in which the proposed language states that the MPHA "may", deleting "will", reschedule the hearing when a tenant makes a reasonable accommodation or VAWA request at the hearing. SOP, p. 84. If the result of a request for a reasonable accommodation arises at a hearing and does not lead to rescheduling to permit the MPHA to make a decision whether the reasonable accommodation will be approved or denied, the MPHA will have failed to engage in the interactive process that is involved in a reasonable accommodation consideration. The outcome of the determination on the reasonable accommodation request may significantly alter the issues that remain for a determination of an applicant's/resident's rights, altering the evidence to be presented and the law applied to that evidence. The legal rights of the MPHA or the applicant/resident may be harmed if the hearing proceeds without adequate time for the parties to prepare for the changed issues.
77.

MPHA Response: ***Not all requests for a reasonable accommodation are related to the reason for the grievance procedure. To delay a hearing for an unrelated request is unreasonable. For instance, a lease termination for violent criminal activity is unrelated to a tenant's request for a bathtub in the unit.***

78. If the assertion of VAWA protections arises at the hearing, it should lead to rescheduling to permit the MPHA to make a decision regarding whether VAWA applies and its effect on the issues that gave rise to the hearing. The MPHA is first required to determine if VAWA applies and then determine what effect that has on the issues that originally led to the MPHA' s action or failure to act that is the subject of the hearing. If the MPHA requests documentation of VAWA status, the applicant/resident must be given at least 14 days to provide that information to the MPHA so the hearing will necessarily have to be continued for at least 14 days. 42 U.S.C. § 14043e-11 (c) (2013). Even if the MPHA waives VAWA documentation VAWA protection may significantly alter the issues that remain for a determination of an applicant's/resident's rights, altering the evidence to be presented and the law applied to that evidence. The MPHA, as well as the applicant/resident, may need the hearing rescheduled to prepare for a hearing on the remaining issues. The legal rights of the MPHA or the applicant/resident may be harmed if the hearing proceeds without adequate time for the parties to prepare for the changed issues.

MPHA Response: ***Not all requests for VAWA protection are related to the reason for the grievance procedure. To delay a hearing for an unrelated request is unreasonable. For instance, a denial of a request for a bathtub is unrelated to a VAWA certification request for a single episode of domestic violence not resulting in permanent injury.***

79. In September 2013, Legal Aid's comment stated: "Any waiver of free interpretive services by the formal interpreter provided by the MPHA to fulfill its legal obligation to provide free language assistance to the LEP person described in this Paragraph D. 4. b. must include a certification signed by the interpreter stating that the form has been interpreted for the LEP person in her primary language. The consent to waive such a fundamental right must be informed consent. The MPHA's choice to adopt the policy as drafted risks use of MPHA resources to defend legal challenges to it." On September 25, 2013 the MPHA responded: "Thank you for the comment. MPHA will revise the form to add certification that the interpreter has interpreted the form to the client in the client's requested language." In the FY2015 SOP, p. 88, section D. 4. b. has not been revised.

MPHA Response: ***MPHA believes that its waiver complies with federal law and regulation.***

80. The language the MPHA proposes adding to "3.8 Perpetrator", SOP, p. 99, in the "Definitions" section of its VAWA Policy must be removed or revised. As the MPHA has drafted this language, someone who commits sexual assault or stalking would be excluded from the definition of "perpetrator" if s/he was a stranger to the victim or did not fit into the relationships the MPHA has proposed adding. This must be an unintended result on the part of the MPHA. The language proposed appears to be a paraphrasing of the Minnesota statutory language defining domestic abuse, Minn. Stat.§ 518B.Ol, subd. 2 (2013). VAWA 2013, 42 U.S.C. § 14043e-11 (2013), covers far more behavior than the Minnesota statutory definition of domestic abuse. VAWA does not define "perpetrator" in statute or enabling regulations. 42 U.S.C. § 14043e-11 (2013); 24 C.F.R. § 5, Subpart L (2013). HUD guidance on implementing VAWA 2013 does not define "perpetrator". 78 F.R. 47717 (August 6, 2013). The language proposed cannot be used as it is completely without legal basis.

MPHA Response: ***MPHA has inserted the phrase "except for Sexual Assault or <u>stalking</u>" in this section.***

81. In "4.2 Certification", SOP. p. 100 "administrative agency" is misplaced in subparagraph (a), and should be listed in the documentation sources of subparagraph (b).

MPHA Response: ***MPHA made the change.***

DRAFT FY2015 SECTION 8 HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN ("ADMIN PLAN")

82. HUD issued PIH 2014-20 on August 20, 2014 regarding how to comply with the Equal Access to Housing in HUD Housing Programs Regardless of Sexual Orientation or Gender Identity Rule. Agencies covered by this Notice include MTW agencies like the MPJ-IA. Agencies covered by this Notice include MTW agencies like the MPHA. The MPHA must make all revisions to its Admin Plan pursuant to the terms of the Notice, particularly regarding definitions of family, family compositions and issues of eligibility, selection and admissions. Paragraph 4.b. of the Notice specifically directs revision to MPI-IA's Admin Plan to reflect the definitions of family and family composition outlined in the Notice. In addition, the Notice directs MPHA's interactions with applicants and participants concerning issues covered by the Equal Access to Housing in I-IUD Programs Regardless of Sexual Orientation or Gender Identity Rule (77 F.R. 5662 (Feb. 3, 2012)). The MPHA must revise all of its Section 8 Housing Choice Voucher Program policies, procedures, practices and protocols, not just its Admin Plan, to comply with the Notice.

MPHA Response: ***MPHA has a long history of not discriminating against a person in a protected class or based upon sexual orientation or gender identity. MPHA's policies, practices, procedures and protocols are in compliance.***

83. The Draft Admin Plan, p. 3-4, 3-I.F., deletes "deduction from annual income" and replaces it with "dependent allowance" here; and replaces "deduction" with "allowance" at other places in the Draft including but not limited to Admin Plan, pp. 3-4, 3-l.G.; 3-5, 3-I.H.; 3-5, 3-I.I; 6-29, and 6-II.B. There has been no change in the federal regulations, 24 C.P.R. Part 5 (2013), reflecting a deletion of the term "deduction" with replacement by "allowance" by HUD or an act of Congress. These changes are unnecessary and can be misleading or confusing. The proposed changes in this language should not be made throughout the Draft Plan.

MPHA Response: ***The MPHA HCV Program has adopted a Nan McKay and Associates Administrative Plan, a template document created by Nan McKay and Associates. In 2015, Nan McKay and Associates revised their document to "provide clarification".***

84. The Admin Plan at p. 3-19, 3-III.B., includes in the MPI-IA's determination of eligibility "completed a *PHA-approved* supervised drug rehabilitation program" (emphasis added). While the MPHA may have staff knowledgeable about drug treatment, the MPJ-IA is not qualified to evaluate and approve rehabilitation programs in this way, as recognized by the MPHA when it correctly removed "approved by MPHA" from tbe description of the rehabilitation program completion to be documented in its FY 2015 Draft SOP, p. 26, 4.F.l).

MPHA Response: ***MPHA will remove "PHA approved".***

85. The Admin Plan, p. 3-23, 3-III.B., mistakenly omits "sexual assault" from the list of VAWA incidents included in VAWA 2013 legal coverage and must be corrected.

MPHA Response: ***MPHA deleted this language and made reference to its VAWA Policy.***

86. The Admin Plan, p. 3-26, 3-III.F., mistakenly omits "sexual assault" from the list of VAWA incidents included in VAWA 2013 legal coverage and must be corrected.

MPHA Response: ***MPHA deleted this language and made reference to its VAWA Policy.***

87. The most current mandated exclusions from income appear at 70 Fed. Reg. 28938 (May 20, 2014). The citation and listing in the Admin Plan, p. 6-24, 6-I.L. must be corrected.

MPHA Response: ***MPHA will make the correction. (CB) (79 Fed reg Notice 28938 5/20/2014)***

88. The Admin Plan, p. 7-8, 7-II.A., proposes to require that school records for verification of legal identity for children be certified. Attorneys and advocates who work exclusively with children on their legal needs report that most K-12 schools do not have the ability or the procedures in place to provide certified records. Making the proposed change erects a barrier that is an impossibility to achieve and thus poses delays for families and the MPHA. MPHA applicants and participants would be better served if the MPHA did not require certification of records that cannot be certified. If the MPHA receives a school record that raises doubts about authenticity the MPHA has the option of verifying with the school or requiring one or more of the other forms of verification listed.

MPHA Response: ***MPHA deleted certified and inserted verifiable.***

89. The Admin Plan, p. 9-3, 9-I.A., mistakenly omits "sexual assault" from the list of VAWA incidents included in VAWA 2013 legal coverage and must be corrected.

MPHA Response: ***MPHA deleted this language and made reference to its VAWA Policy.***

90. The Admin Plan, p. 9-ll and 9-I.I., describes the MPHA's practice of negotiating an approvable rent in the process of tenancy approval. It is very important for landlord and participant alike to have these negotiations thoroughly documented. We have assisted participants with cases involving allegations of violation of the federal False Claims Act by landlords in which documentation by the MPHA of such negotiations would have been very useful where neither landlord nor participant had documented their interactions regarding rent terms with each other and with the MPHA. This section should state that the MPHA will document such negotiations in the participant's file.

MPHA Response: ***MPHA does document; the documentation can be obtained if requested.***

91. The MPHA proposes adding "alcohol abuse" to the Admin Plan list of reasons it may terminate a family's assistance, *see* Admin Plan, p. 12-5, 12-I.E. The language needs to be revised to properly state the legal standard for such a termination which is found at 24 C.F.R. § 982.552 (c) (xi) (2013), referencing 24 C.F.R. § 982.553 (a)(3) (2013) which states "abuse or pattern of abuse of alcohol [that] may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents."

MPHA Response: ***MPHA added the following language: "abuse or pattern of abuse of alcohol that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents, guests, neighbors, or MPHA staff and vendors."***

92. The Admin Plan proposes limiting repayment agreements to no more than 24 months. Admin Plan, p. 16-20, 16-IV.B. This limitation violates HUD Guidance establishing that the repayment time of a repayment agreement is based on monthly payment and the original retroactive rent amount. PIH 2010-19, extended in PIH 2013-23, 16. In the same Paragraph HUD also establishes a limit on the monthly payments, stating that the retroactive rent payment plus the monthly rent cannot exceed 40% of the participant's adjusted gross income. This section of the Admin Plan, and any other reference in the Admin Plan to repayment agreements, including but not limited to Admin Plan, p. 16-21, 16-IV.B., must be revised to comply with HUD's EIV instructions.

MPHA Response: ***Please see answer to #73.***

93. The definition of "Affiliated Individual" for purposes of the violence Against Women Act (VAWA) should be added to the Glossary, Admin Plan, GL-3. It is not sufficient to state that the MPHA will comply with law as that does not inform the community, applicants, resident and advocates of the meaning of this term of art, so just as the MPHA has placed definitions in

the Glossary that appear in other parts of its Admin Plan the definition of "Affiliated Individual" should be there as well. The definition used in the MPHA VAWA Policy, Admin. Plan, p. D-1, Paragraph 3.l,should be used.

MPHA Response: ***MPHA added this term to the Glossary.***

94. The definition of "Dating Violence" for purposes of the violence Against Women Act (VAWA) should be added to the Glossary, Admin Plan, GL-5. It is not sufficient to state that the MPHA will comply with law as that does not inform the community, applicants, resident and advocates of the meaning of this term of art, so just as the MPHA has placed definitions in the Glossary that appear in other parts of its Admin Plan the definition of "Dating Violence" should be there as well. The definition used in the MPHA VAWA Policy, Admin. Plan, p. D-2, Paragraph 3.3, should be used.

MPHA Response: ***MPHA added this term to the Glossary.***

95. The definition of "Domestic Violence" for purposes of the violence Against Women Act (VAWA) should be added to the Glossary, Admin Plan, GL-5. It is not sufficient to state that the MPHA will comply with law as that does not inform the community, applicants, resident and advocates of the meaning of this term of art, so just as the MPHA has placed definitions in the Glossary that appear in other parts of its Admin Plan the definition of "Domestic Violence" should be there as well. The definition used in the MPHA VAWA Policy, Admin. Plan, p. D-2, Paragraph 3.4, should be used.

MPHA Response: ***MPHA added this term to the Glossary.***

96. The definition of "Sexual Assault" for purposes of the violence Against Women Act (VAWA) should be added to the Glossary, Admin Plan, GL-15. It is not sufficient to state that the MPHA will comply with law as that does not inform the community, applicants, resident and advocates of the meaning of this term of art, so just as the MPHA has placed definitions in the Glossary that appear in other parts of its Admin Plan the definition of "Sexual Assault" should be there as well. The definition used in the MPHA VAWA Policy, Admin. Plan, p. D-3, Paragraph 3.9, should be used.

MPHA Response: ***MPHA added this term to the Glossary.***

97. The definition of "Stalking" for purposes of the violence Against Women Act (VAWA) should be added to the Glossary, Admin Plan, GL-16. It is not sufficient to state that the MPHA will comply with law as that does not inform the

community, applicants, resident and advocates of the meaning of this term of art, so just as the MPHA has placed definitions in the Glossary that appear in other parts of its Admin Plan the definition of "Stalking" should be there as well. The definition used in the MPHA VAWA Policy, Admin. Plan, p. D-3, Paragraph 3.10, should be used.

MPHA Response: ***MPHA added this term to the Glossary.***

98. The language the MPHA proposes adding to "3.8 Perpetrator", Admin Plan, p. D-3, in the "Definitions" section of its VAWA Policy must be removed or revised. As the MPHA has drafted this language, someone who commits sexual assault or stalking would be excluded from the definition of "perpetrator" if s/he was a stranger to the victim or did not fit into the relationships the MPHA has proposed adding. This must be an unintended result on the part of the MPHA. The language proposed appears to be a paraphrasing of the Minnesota statutory language defining domestic abuse, Minn. Stat. § 518B.01, subd. 2 (2013). VAWA 2013, 42 U.S. C. § 14043e-11 (2013), covers far more behavior than the Minnesota statutory definition of domestic abuse. VAWA does not define "perpetrator" in statute or enabling regulations. 42 U.S.C. § 14043e-11 (2013); 24 C.P.R. § 5, Subpart L (2013). HUD guidance on implementing VAWA 2013 does not define "perpetrator". 78 F.R. 47717 (August 6, 2013). The language proposed cannot be used as it is completely without legal basis.

MPHA Response: ***Please see the answer to #79.***

99. In "4.2 Certification", Admin Plan, p. D-4, "administrative agency" is misplaced in subparagraph (a), and should be listed in the documentation sources of subparagraph (b).

MPHA Response: ***MPHA made his change.***

100. There are a number of points at which the Low Income Public Housing Statement of Policies (SOP) and Section 8 Housing Choice Voucher Administrative Plan (Admin Plan) continue to misstate the law or create a policy that violates the law. We have pointed out those deficiencies in at least two, and in some instances three, past MPHA Annual Plan comment processes. The MPHA's responses have repeatedly been no more than "Thank you for the comment." or "MPHA declines to make this change." The points we have raised in the past remain unchanged in the MPHA's policy documents

for FY2015. In light of the MPHA's past consistent refusals to make revisions to those points we have not included any further comments on those matters. Our time is not well-spent addressing those issues in the context of the Annual Plan process again.

MPHA Response: ***MPHA is unable to respond to this comment as there are no specific citations to specific policies or the MPHA Plan.***

101. In previous comments on many of those points, we specifically stated that failure to make revisions or corrections risks use of MPHA resources to defend legal challenges to those policies and procedures when they are applied to applicants, residents and participants and harm results. In its Annual Plan responses the MPHA has mistakenly characterized this as a "threat of litigation". It is not a threat. It is notice to the MPHA that should the particular policy, practice or procedure remain uncorrected and an applicant, resident or participant seek our assistance with the resulting harm, we will not provide further notice to the MPHA of the offending policy, practice or procedure. We will advise our client of his or her administrative and/or judicial remedies and assist them as appropriate since the MPHA has had prior notice of the issue and repeated opportunities to change course.

MPHA Response: ***MPHA is unable to respond to this comment.***

102. If the MPHA decides to make changes on any of those issues in the future and is required by law to use a notice-and-comment process for those changes, we will review the proposals published at that time and comment on behalf of our clients as appropriate at that time.

MPHA Response: ***Thank you.***

103. We encourage the MPHA to make changes in its MPHA Draft FY2015 Annual Moving To Work Plan, MPHA Draft FY 2015 Low Income Public Housing statement of Policies, and MPHA Draft FY2015 Section 8 Housing Choice Voucher Administrative Plan in response to our comments listed above before these Drafts are presented to the MPHA Board of Commissioners for approval for submission to HUD.

MPHA Response: ***Thank you.***

Karen Clark

State Representative
District 62A
Minneapolis
September 5, 2014

Minnesota House of

Representatives

MPHA Board of Directors
1001 Washington Ave. N.
Minneapolis, MN 55401

Attn: Cora McCorvey and MPHA Board of Directors

As you know, I represent many of the MPHA's High Rise constituents in South Minneapolis. I am writing to you to request your consideration on four matters that have repeatedly come to my attention from these residents in the last year. I will begin with the most time-sensitive.

104. I understand that the MPHA Board is considering the issue of the MTW amendment that would "continue the rent obligation for residents whose incomes are temporarily reduced due to being absent from the unit for more than 30 days." **I want to state my opposition to this proposal**. As you may know, I last worked on this issue with you several years ago at which time the issue was whether or not residents could have their allowable absence extended beyond the 30 day limit at the time. You wisely agreed to increase that option to 90 days in consideration of the strongly expressed need of many of our East African immigrants to be able to travel to their homelands on their rare but highly significant family visitations.

The current concern raised to me in many of my visits with the High Rise Representative Councils in the last year is the $75/month penalty a resident must already pay back when they return. This is a big hardship for most MPHA residents I have heard from because, at the very same time that the resident is gone out of the country, they lose all of their SSI or other federal benefits until they return. It is clear that most of our MPHA residents have no excess monthly income from which to pay a debt

of $225 ($75 x3), and so although this penalty is spread out over time, it still creates great financial hardship, affecting food and nutrition choices as well as other life essentials. Another significant reason why I strongly urge you to change this proposal and **instead eliminate the $75/month penalty** is that the policy violates the 30% of income guideline (30% x 0 = 0 not $75). Also, as I understand it, this "lost rental income" can be fully recouped by MPHA from the federal government in the subsidy adjustment the following year. It is also worth noting that the federal government saves considerably more than that amount on the SSI suspension of payments/month then is being lost in rental income!

I understand that the projected impact to MPHA is about $45,000 annually from approximately 100 MPHA residents leaving the country/year. This is such a small proportion of the MPHA federal subsidy, but is clearly such a significant personal hardship for most MPHA residents. It is also worth noting that this policy almost exclusively penalizes our refugee and immigrant populations, raising a potential issue of discrimination. If you are considering this MTW proposal in your next Board meeting, I would appreciate being invited to express my concerns, as would may other legislators.

MPHA Response: ***Please see MPHA Response #14***

105. **Security issues** continue to be of great concern in several of the high-rises I represent. There have been muggings and stolen personal property in some of the areas surrounding the entrances and exits to the high-rises, Project LookOut has had its funding significantly cut, and the hours of security guards greatly curtailed. I am hopeful that, as the State of MN passed a 2014 bonding bill that included $20 million to assist in the repair and preservation of our public housing, that new funding may provide some financing relief and allow reconsideration of security cutbacks. I can assure that I will also continue to try not only to increase that amount to the real need (more than $300 million state-wide) but also to work with MPHA to cut other costs, including tax relief, as I did last year. I believe the bill we did succeed in passing for your benefit in 014 saved MPHA approximately $400,000/year. If I am re-elected this fall, I hope to work with you on the additional initiatives we began last year. My request is that some of these additional savings or added resources be targeted to help increase the security requests of residents for their homes.

MPHA Response: ***Please see MPHA Response #18.***

106. **Bed-bug infestation** continues to be a major concern to many, many MPHA residents. As you know I worked with Mr. Boyd

and his staff to create legislation that I introduced in 2014 that would have given Minneapolis a pilot program to test the benefit of more and higher volume equipment to assist our public housing maintenance staff to eliminate bed bug infestation in public housing. We did not come to a final agreement on the best equipment to be used and the bill I introduced did not get the hearing I requested in the Health and Human Services Committee last year. I request that we work harder to craft a bill agreeable to MPHA staff, residents and legislators who can advocate for the resources needed for this important livability issue. This is a problem that can be solved, but it needs dedicated resources and the will to use those resources throughout.

MPHA Response: ***Please see MPHA Response #45. In addition, MPHA looks forward to working with you on legislative and funding opportunities related to this matter.***

107. I am interested in working with MPHA residents and administration to strategize ways to engage our public housing residents in **urban farming opportunities** that may help them to gain improved access to healthier food and nutrition resources. I would like to help initiate several ways to do that and suggest you help me convene interested residents to begin a planning process for those who express interest..

MPHA Response: ***MPHA is committed to urban gardening; we provide garden space at all highrises and community garden space at other MPHA properties. MPHA has been working with the Minneapolis Health Department and has received a community garden "mini-grant" to provide raised garden beds at certain senior buildings. This gardening program was featured in the summer issue of "Health in the City."***

In summary, I hope you will consider these four concerns as you deliberate your future plans for MTW and both your federal and state legislative agendas for 2015. I look forward to partnering with you to devise successful resolutions to these challenges.

Thanks for your consideration. Please free to contact me by phone or email.

Karen Clark, State Representative
District 62A, Minneapolis, MN

APPENDIX C: Performance & Evaluation Reports

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2012
Minneapolis Public Housing Authority	Capital Fund Program Grant No: MN46P00250112 Replacement Housing Factor Grant No: Date of CFFP:	**FFY of Grant Approval:**

Type of Grant
☐ **Original Annual Statement** ☐ **Reserve for Disasters/Emergencies** ☐ **Revised Annual Statement (revision no:)**
☒ **Performance and Evaluation Report for Period Ending: 12/31/2013** ☐ **Final Performance and Evaluation Report**

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised[2]	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) [3]				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	10,631,469	10,631,469	10,631,469	8,489,002
16	1495.1 Relocation Costs				
17	1499 Development Activities [4]				

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

Part I: Summary

PHA Name: Minneapolis Public Housing Authority	**Grant Type and Number** Capital Fund Program Grant No: MN46P00250112 Replacement Housing Factor Grant No: Date of CFFP:	**FFY of Grant:2012** **FFY of Grant Approval:**

Type of Grant

☐ **Original Annual Statement** ☐ **Reserve for Disasters/Emergencies** ☐ **Revised Annual Statement (revision no:)**

☒ **Performance and Evaluation Report for Period Ending: 12/31/2013** ☐ **Final Performance and Evaluation Report**

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant:: (sum of lines 2 - 19)	10,631,469	10,631,469	10,631,469	8,489,002
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

Signature of Executive Director	**Date** Sept 19, 2014	**Signature of Public Housing Director**	**Date**

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

Part II: Supporting Pages

PHA Name:	**Grant Type and Number**	**Federal FFY of Grant: 2012**
Minneapolis Public Housing Authority	Capital Fund Program Grant No: MN46P00250112 CFFP (Yes/ No): No Replacement Housing Factor Grant No:	

Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated[2]	Funds Expended[2]	
MN002	Moving to Work Demonstration Program	1492	6,253 Units	10,631,469	10,631,469	10,631,469	8,489,002	80%

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule for Capital Fund Financing Program

PHA Name: **Minneapolis Public Housing Authority**

Federal FFY of Grant: 2012

Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates [1]
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
	03/11/2014	12/31/2013	03/11/2016		

[1] Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2013
Minneapolis Public Housing Authority	Capital Fund Program Grant No: MN46P00250113 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval:

Type of Grant
☐ Original Annual Statement ☐ Reserve for Disasters/Emergencies ☐ Revised Annual Statement (revision no:)
☒ Performance and Evaluation Report for Period Ending: 12/31/2013 ☐ Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised[2]	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) [3]				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	10,331,899	10,331,899	1,158,024	0
16	1495.1 Relocation Costs				
17	1499 Development Activities [4]				

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

Part I: Summary

PHA Name: Minneapolis Public Housing Authority	**Grant Type and Number** Capital Fund Program Grant No: MN46P00250113 Replacement Housing Factor Grant No: Date of CFFP:	**FFY of Grant:2013** **FFY of Grant Approval:**

Type of Grant

☐ **Original Annual Statement** ☐ **Reserve for Disasters/Emergencies** ☐ **Revised Annual Statement (revision no:)**

☒ **Performance and Evaluation Report for Period Ending: 12/31/2013** ☐ **Final Performance and Evaluation Report**

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant:: (sum of lines 2 - 19)	10,331,899	10,331,899	1,158,024	0
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

Signature of Executive Director	**Date** Sept 19, 2014	**Signature of Public Housing Director**	**Date**

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

Part II: Supporting Pages

PHA Name:	Grant Type and Number	Federal FFY of Grant: 2013
Minneapolis Public Housing Authority	Capital Fund Program Grant No: MN46P00250113 CFFP (Yes/ No): No Replacement Housing Factor Grant No:	

Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated[2]	Funds Expended[2]	
MN002	Moving to Work Demonstration Program	1492	6,253 Units	10,331,899	10,331,899	1,158,024	0	0%

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule for Capital Fund Financing Program

PHA Name: **Minneapolis Public Housing Authority**

Federal FFY of Grant: 2013

Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates [1]
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
	09/8/2015		09/08/2017		

[1] Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Appendix D

CERTIFICATE

I, Paula Sotelo, Executive Administrative Assistant of the Minneapolis Public Housing Authority in and for the City of Minneapolis, do hereby certify that the attached **RESOLUTION** was duly adopted at a regular meeting of the Board of Commissioners of said Authority, held on September 24, 2014, and is a true and correct copy of the **RESOLUTION** adopted at said meeting and on file and of record in the official Minutes of said Authority.

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of said Authority this 24th day of September, 2014.

I DO HEREBY CERTIFY THAT I AM DULY AUTHORIZED TO EXECUTE THIS CERTIFICATE.

Paula A. Sotelo

(SEAL)

Appendix D

Approved

September 24, 2014

Agenda Item 2

REPORT TO THE COMMISSIONERS

FROM: Cora McCorvey, Executive Director / CEO

SUBJECT: MPHA 2015 Moving To Work (MTW) Plan and Changes to the MPHA Statement of Policies and Section 8 Administrative Plan

Previous Directives: On January 6, 2008, MPHA signed an MTW Agreement with HUD making the Agency a "full status" MTW Agency. This status requires MPHA to create an Annual MTW Plan. On July 6, 2008, the Board approved MPHA's first MTW Plan under this new agreement with HUD and has subsequently approved a new MTW Plan each year following.

Resident Notification: The MPHA Board of Commissioners appointed the MTW Resident Advisory Board (RAB) consisting of representatives from the Tenant Advisory Committee, and other members representing MPHA populations groups, including Highrise, Family, Scattered Site and Section 8, for the purpose of ensuring resident and participant involvement in the MTW Plan process. RAB and TAC will both review this report prior to the September 24, 2014 Board Meeting.

Impact on Budget: The MTW Plan identifies how MPHA resources will be spent, but does not itself have a budgetary impact.

Procurement Review: Not applicable

Recommendation: It is recommended that the Board of Commissioners adopt a resolution approving the MPHA FY2015 MTW Plan and forward it to HUD as required by the MTW Agreement. It is further recommended that the Board of Commissioners approve the proposed changes to the Statement of Policies and Section 8 Administrative Plan.

The development of an Annual MTW Plan is a requirement of the Revised Standard Moving To Work Agreement between HUD and MPHA. The 2015 MTW Plan includes an Introduction with the Agency's Short and Long Term MTW Goals and Objectives, General Housing Authority Information, information on MPHA's proposed 2015 MTW "Shelter to Housing" Initiative, updates on MPHA's on-going MTW activities, MPHA's 2015 MTW Budget and various other administrative information, including the "Comments and Responses" regarding the 2015 MTW Plan and the proposed changes to the MPHA Statement of Policies and Section 8 Administrative Plan. Also included for consideration as

DOCUMENT NO. 2014-35

part of the 2015 MTW Plan process are proposed changes to the MPHA Statement of Policies and Section 8 Administrative Plan.

As is its tradition, MPHA used extraordinary efforts to solicit input in the development of proposed changes to the 2015 MTW and its administrative policies for both Low Income Public Housing and HCV / Section 8. Following the appointment of the MTW Resident Advisory Board (RAB) by the MPHA Board of Commissioners, the MTW RAB met on a regular basis working with Agency staff to consider proposals for the Draft MTW Plan. RAB also developed a statement of Guiding Principles and adopted priorities which are included in the "Administrative" section of the MPHA MTW Plan.

In addition, RAB was asked for and encouraged to provide other ideas and or guidance to MPHA prior to the Draft Plan. Once the Draft Plan was presented to RAB, it was also published on the MPHA Website, copied and sent to all building Resident Council presidents, to the MHRC Executive Committee and the Scattered Site and Glendale Resident Councils. Every Public Housing resident received notice of the Advance Meeting and Public Hearing in their rent statements and were invited to share their comments on the Draft MTW plan by e-mail to MPHA's Policy and Special Initiatives Department. MHRC published notice of the Advance Meeting and Public Hearing in the Highrise Lowdown a publication that is directed to 5000 highrise residents. MPHA provided a lunch to all residents and participants who attended the Advance Meeting, solicited and responded to any and all questions from residents and participants at the Advance Meeting. Staff also provided comment sheets in the Advance Meeting packets for residents and participants who did not have enough time to comment on all of their concerns or who were more comfortable addressing their concerns and offering their ideas in writing. Staff specifically invited Legal Aid to meet and confer regarding any concerns and/or suggestions related to the 2015 MTW Plan. Though they did not take advantage of this offer, Legal Aid submitted numerous comments which are included in the Comments and Responses document attached to the 2015 MTW Plan.

The Comments and Responses Section of the 2015 MTW Plan lists comments by the MTW Resident Advisory Board, attendees at the public hearing, as well as comments by various resident organizations, key constituencies and individual residents. This section also includes MPHA responses and changes to the Draft MTW Plan and administrative policies based upon the comments received.

A copy of the proposed Board Resolution is attached to this Report. The MTW Plan must be submitted to HUD prior to October 15, 2014.

This Report was prepared by Bob Boyd, Director of Policy and Special Initiatives. For Further information, please contact Mr. Boyd at (612) 342-1437 or bboyd@mplspha.org.

Appendix D

RESOLUTION No. 14-147

WHEREAS, the Minneapolis Public Housing Authority in and for the City of Minneapolis (MPHA) signed a Moving To Work (MTW) Agreement with the U.S. Department of Housing and Urban Development (HUD) on January 6, 2008, making MPHA a "full status" Moving To Work Agency; and

WHEREAS, the full status Moving To Work Agreement requires MPHA to create an annual Moving To Work Plan; and

WHEREAS, MPHA also identified and made changes to its Statement of Policies; Section 8 Administrative Plan; and the MPHA Investment Policy; and

WHEREAS, MPHA is required to submit the Moving To Work Plan to HUD prior to October 15, 2014;

NOW THEREFORE, BE IT RESOLVED, by the MPHA Board of Commissioners that the 2015 Moving To Work (MTW) Plan and the changes to the Agency Statement of Policies, Section 8 Administrative Plan and MPHA Investment Policy are approved and that the Executive Director is authorized to submit them to HUD for approval as required.

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

Attachment B

Certifications of Compliance

Annual Moving to Work Plan
Certifications of Compliance

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

Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan*

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning January 1, 2015, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Minneapolis Public Housing Authority PHA Name	MN002 PHA Number/HA Code

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

F. Clayton Tyler Name of Authorized Official	Chair, MPHA Board of Commissioners Title
Signature	September 24, 2014 Date

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