



ORLANDO HOUSING AUTHORITY

April 5, 2012

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

RE: Submission of the Orlando Housing Authority's Revised Annual Moving to Work (MTW) Plan for Year 2 (April 1, 2012 to March 31, 2013)

Dear Mr. Pour:

Enclosed please find the revised version of the Orlando Housing Authority's (OHA) Annual Moving to Work (MTW) Plan for Year 2 (April 1, 2012 to March 31, 2013). As requested, the Plan has been revised to incorporate changes in Section II-A and Section II-B (see pages 4, 4a, 4b and 5 of the revised submission). The MTW Activities Track Matrix (Implementation Steps and Plan Year Target Dates) for approved MTW Activities 5, 6 and 7 has also been updated to reflect current status (see Section VI-B, Status of Ongoing Approved Activities, pages 25-30).

We look forward to the implementation of the Orlando Housing Authority's Year 2 MTW Plan. If you have any questions regarding our revised submission, please contact me at (407) 895-3300, extension 1000.

Sincerely,

Vivian Bryant, Esq.
President/CEO

Enclosure

c.c. Mrs. Victoria Main
Ms. Emily Cadik



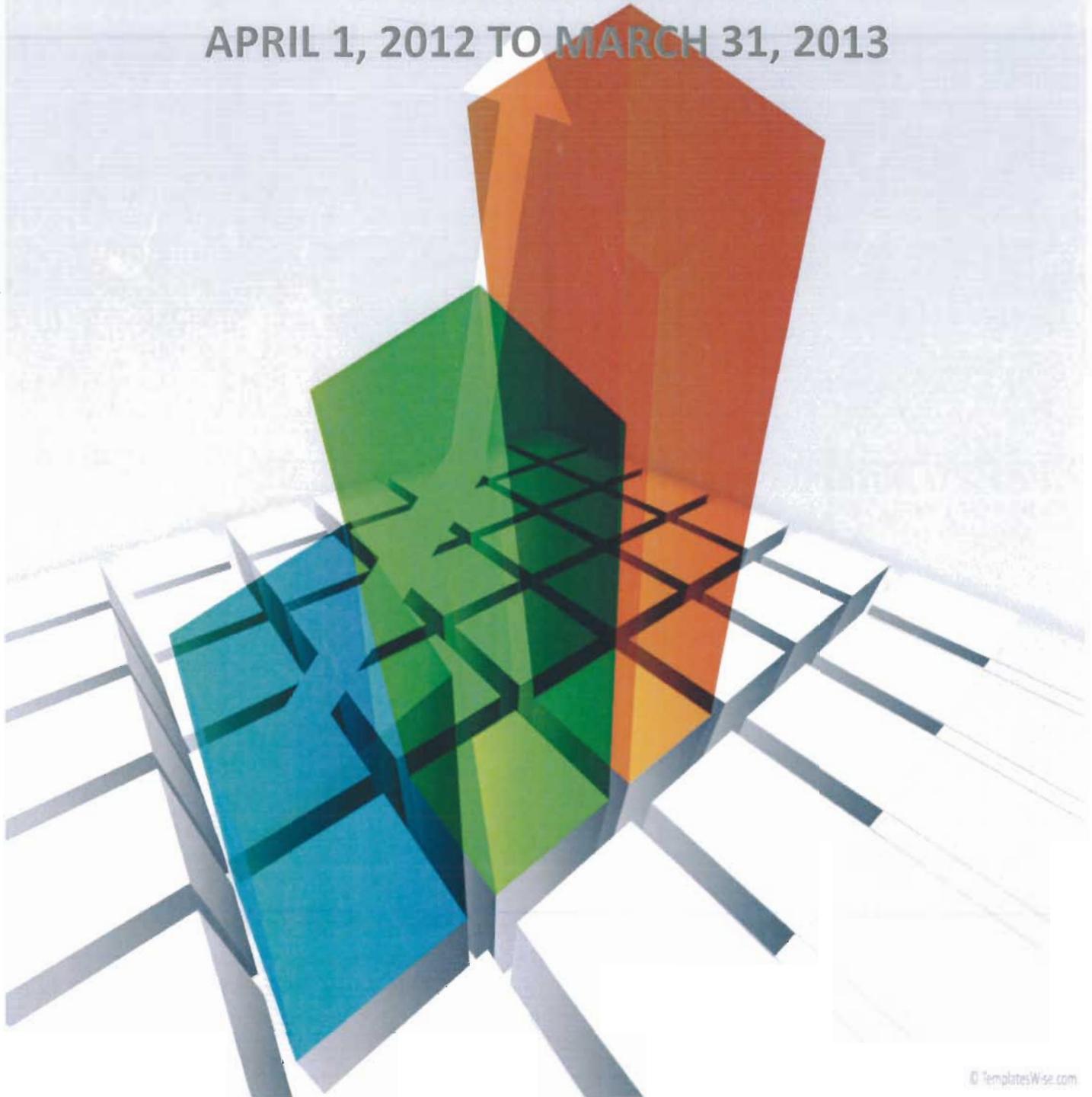
ORLANDO HOUSING AUTHORITY



MOVING TO WORK (MTW)

PLAN FOR YEAR 2

APRIL 1, 2012 TO MARCH 31, 2013



Orlando Housing Authority
Year 2 Annual Moving to Work (MTW) Plan
(April 1, 2012 to March 31, 2013)
Issued for Public Comment
November 15, 2011

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(April 1, 2012 to March 31, 2013)
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TAB I

Section I: Introduction

Section I-B: Overview of OHA's MTW Goals and Objectives

SECTION I. INTRODUCTION

B. Overview of the Agency's Moving to Work Goals/Objectives for Year 2 (4/1/12 - 3/31/13)

The Orlando Housing Authority (OHA) began implementation of its Moving to Work Plan for the 15-month Initial Demonstration Period (1/1/11 to 3/31/12) in January 2011, following the execution of the Amended and Restated MTW Agreement with HUD on January 7, 2011. The Authority's Moving to Work Plan for Year 2, commencing April 1, 2012, both builds upon the progress OHA made in the Initial Demonstration Period and recognizes the initial tasks yet to be accomplished. For example, in view of the very promising initial implementation of the \$225 self-sufficiency rent floor coupled with the self-sufficiency resource center, the phase-in of those activities in Year Two will continue as originally contemplated. On the other hand, the Authority proposes no new Moving to Work activities for Year Two, so that it can devote its attention to progress on the very ambitious group of activities laid out for Year One.

All of the Authority's Moving to Work goals and objectives relate to one or more of the Demonstration Program's three statutory purposes: A) increase cost effectiveness, B) increase self-sufficiency, and C) increase housing choices for low-income families. The Authority expects a number of approved Moving to Work activities and uses of funds to evolve over time in response both to internal and external factors affecting implementation and as a result of ongoing assessments of effectiveness. Such factors may require the Authority to modify and or eliminate some of the initial established benchmarks/metrics or add new ones to more accurately assess the extent of the impact of the activity on the lives of residents and clients served and/or the operational efficiency of the Authority, as well as the degree to which statutory purpose(s) have been achieved.

The list below delineates Moving to Work Activities and Uses of Funds and identifies the statutory purpose(s) to which each relates.

Moving to Work Activity 1:

Phase in implementation of a self-sufficiency rent floor (\$225) for households with non-elderly, non-disabled adults, with hardship exceptions linked to self-sufficiency activities (Approximately 50 residents from Reeves Terrace, Griffin Park and Murchison Terrace cannot meet the minimum rent floor at this time and will be referred to the Resource Center) (Statutory purposes A and B)

Moving to Work Activity 2:

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

Moving to Work Activity 3:

Streamline the rent calculation process in the public housing and voucher programs (Modified third-party verification and disregard assets less than \$25,000). (Statutory purpose A)

Moving to Work Activity 4:

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

Moving to Work Activity 5:

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

Moving to Work Activity 6:

Partner with Central Florida Commission on Homelessness to provide a homeless/transitional housing facility [Provide up to 50 one-bedroom units at West Oaks Provide (5 first years) for homeless individuals for up to 18 months]. (Statutory purposes B and C)

Moving to Work Activity 7:

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

Moving to Work Use of Funds A:

Provide a comprehensive 1-stop self-sufficiency resource center to promote use of single-fund flexibility. (Statutory purpose B)

Moving to Work Use of Funds B:

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

Moving to Work Use of Funds C:

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

Over the course of the past ten months, the Authority has made progress toward meeting many of the goals and objectives for the initial project period (See Section VI. B - Status Update on Activities). Implementation timelines for some activities have been extended into Year 2 to account for external factors beyond the Authority's control, including changes in economic conditions and/or a need for additional approvals (MTW Activities 4, 6 and 7); while start-up for several others activities was slightly delayed following a determination that additional planning and action steps were required to ensure effective execution (MTW Activity 5 and MTW Use of Funds B). Implementation of Use of Funds B, completion of the Greening of the Authority, is currently underway and the Foreclosure Prevention Initiative (MTW Activity 5) will begin in March 15, 2012.

During Year 2 of our Moving to Work Program, the Authority plans to continue implementing the approved activities and uses of funds for the initial demonstration period listed above. This includes the planned phase-in of Moving to Work Activity 1 (self-sufficiency rent floor linked to self-sufficiency activities for households with non-elderly, non-disabled adults, with hardship exceptions) at three more public housing sites: Reeves Terrace, Griffin Park Apartments, and Murchison Terrace.

Implementation of MTW Activity 2, Streamlining of the recertification process in public housing and voucher programs, and MTW Activity 3, Streamlining of the rent calculation process in public housing and voucher programs will continue and the impact of these activities on program efficiency and effectiveness will be assessed.

During Year 2, several other MTW Activities, including the consolidation of inspection and recertification requirements, (MTW Activity 4), the provision of Interim Voucher Assistance and related Counseling to Prevent Foreclosure (MTW Activity 5), and the provision of a transitional housing facility (MTW Activity 6), will move from the planning phase to initial implementation.

TAB 2

Section II: General Operating Information

Section II-A: Housing Stock Information

Section II-B: Leasing Information, Planned

Section II-C: Waiting List Information

SECTION II. GENERAL OPERATING INFORMATION

A. Housing Stock Information

Number of public housing units at the beginning of the year; (ACC as of 4/1/12)	1,511
General description of any planned significant capital expenditures by development (>30% of the Agency's total budgeted capital expenditures for the fiscal year);	N/A
Description of any new public housing units to be added during the year by development (specifying bedroom size, type, accessible features, if applicable);	N/A
Number of public housing units to be removed from the inventory during the year by development specifying the justification for the removal;	210*
Number of MTW Housing Choice Vouchers (HCV) units authorized; Total is from ACC as of 4/1/2012 (includes 90 vouchers transferred from Sanford Housing Authority to OHA effective 1/1/11 and 100 OHA FUP Vouchers)	2,883
Number of non-MTW HCV units authorized; and Non-Elderly/Non-Disabled: 100* VASH: 350* SRO: 100** Tenant Protection Vouchers for former residents of five SHA PH Sites: (280 +78) = 358* TOTAL: 908 *Data source is OHA's VMS submission for 1/1/2011 **Data source is ECS/OHA Intranet report for 1/1/2011	908
Number of HCV units to be project-based during the Plan year, including description of each separate project. 45 project-based vouchers will be utilized in implementing planned MTW Activity 7: "Use project-based vouchers and other resources to develop city-donated property for low-income elderly housing." This Activity was included in our approved MTW Plan for the initial project period and in our executed Standard Moving to Work Agreement, Attachment C, Paragraph 7a. This Activity involves the redevelopment of Jackson Court and Division Oaks. OHA is entering into a partnership with Carver Theatre Developers to replace these units within their new proposed development of 100 units of senior mixed income housing in the City of Orlando. OHA has executed a MOU with the Carver Park Theatre Developers with a commitment to provide a minimum of 45 project-based vouchers for the seniors that would be displaced through the redevelopment plan. 50 of these project-based Section 8 vouchers will be utilized to implement planned MTW Activity 6: "Partner with the Central Florida Commission on Homelessness to provide a transitional housing facility." OHA had originally planned to implement this initiative by securing approval for ACC authority to place 50 public housing units at West Oaks. Fannie Mae has indicated that it will not allow ACC units to be placed at West Oaks. As an alternative, OHA will submit an amendment to the MTW Plan for Year 2 requesting approval of waiver of regulations to project-base 50 Section 8 vouchers at West Oaks.	95

***Application to HUD requesting approval to demolish 210 units at Lake Mann Homes is pending.**

B. Leasing Information, Planned

<p>Anticipated total number of MTW PH units leased in the Plan year; Total as of 4/1/12 - Assumes 15 units reserved for special purposes and an average vacancy rate of 40 units.</p>	<p>1,456</p>
<p>Anticipated total number of non-MTW PH units leased in the Plan year;</p>	<p>N/A</p>
<p>Anticipated total number of MTW HCV units leased in the Plan year; April 1, 2012 - 2,366 - OHA MTW Vouchers * +83 - Tenant Protection Vouchers for former SHA LMT site become OHA MTW Total: 2,449 Vouchers</p>	<p>2,449</p>
<p>Anticipated total number of non-MTW HCV units leased in the Plan year; and Non-Elderly/Non-Disabled: 89* VASH: 220* SRO: 89** Tenant Protection Vouchers for former residents of five (5) Sanford Housing Authority (SHA) Public Housing Sites: 266 * TOTAL: 664* *Data source is VMS submission for 1/1/2012 **Data source is ECS/OHA Intranet report for 1/31/2011</p>	<p>664</p>
<p>Description of anticipated issues relating to any potential difficulties in leasing units (HCV or PH).</p> <p>These issues have far more impact on public housing occupancy than on voucher program unitization. A substantial number of applicants for Public Housing fail criminal background checks at the time of admission, making it difficult to fill vacancies from the waiting list in a timely manner. The lack of public transportation from the available public housing unit to the applicant's place of employment often results in applicant's refusing the unit, which also extends the time required to fill vacancies. In addition, a significant number of public housing residents fail criminal background checks at the time of recertification resulting in their termination, which increases the number of vacant units which must be filled from the waiting list.</p> <p>Similarly, some Section 8 program participants fail criminal background checks at the time of recertification or moves, which may result in their termination. A sizeable number of Section 8 clients are also terminated for program violations. Other clients, primarily elderly or disabled are hospitalized for extended periods or are in nursing homes and are no longer able to live in their unit through no fault of their own. OHA does not anticipate any significant delay in refilling these vouchers.</p> <p>All of the tenant protection vouchers issued to former residents of the vacated Sanford Housing Authority (SHA) public housing sites will become OHA MTW vouchers during the Plan Year 2. A number of these clients may be terminated for failed criminal background checks and/or program violations, resulting in a need to refill unencumbered vouchers from the SHA Section 8 waiting list.</p>	<p>Criminal backgrounds</p> <p>Lack of transportation</p>

B. Leasing Information, Planned (continued)	
<p>Leasing issues related to non-MTW vouchers.</p> <p>Issues impacting the leasing of SRO units include unexpected vacancies created by the deaths of clients due to illness, and frequent turn-overs due to the very small size of the units and because the units are located in an undesirable neighborhood. These issues can result in some delay in refilling the units.</p> <p>Filling of VASH Program vouchers has been constrained due to a lack of an adequate number and steady flow of referrals from the Veteran’s Administration, which is a prerequisite for program participation.</p>	<p>Very small size of SRO units and location of building.</p> <p>Lack of an adequate number and steady flow of required referrals.</p>
Number of project-based vouchers in use at the start of the Plan year:	0

C. Waiting List Information

OHA does not anticipate any changes in the structure, or the opening or closing, of its waiting lists. The Public Housing Waiting List is open. The Section 8 Waiting List is closed.

Demographic Information

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

	Public Housing		Housing Choice Vouchers	
Total Number On The Waiting List	4018	100%	1920	100%
Distribution by Income Level				
Extremely Low Income	2524	63%	721	38%
Very Low Income	1258	31%	639	33%
Low Income	224	6%	235	12%
Above Low Income	12	0%	325	17%
Distribution by Bedroom Size				
0 Bedrooms	1773	44%	524	27%
1 Bedroom	153	4%	199	11%
2 Bedrooms	1414	35%	493	26%
3 Bedrooms	577	14%	521	27%
4 Bedrooms	90	3%	160	8%
5 Bedrooms	10	0%	17	1%
6+ Bedrooms	1	0%	6	0%
Distribution by Family Type				
Elderly Disabled	287	7%	124	6%
Elderly Non-Disabled	258	6%	85	4%
Non-Elderly Disabled	1253	32%	456	24%
Non-Elderly Non-Disabled	2220	55%	1255	66%
Distribution by Race of Head of Household				
White	1731	43%	484	25%
Black/African American	2117	54%	1344	70%
Asian	22	0%	6	0%
Native Hawaiian/Other Pacific Is.	80	2%	12	1%
Other/Unknown	68	1%	74	4%
Distribution by Ethnicity of Head of Household				
Hispanic or Latino	1840	46%	469	24%
Not Hispanic or Latino	2178	54%	1451	76%

TAB 3

Section III: Non MTW Related Activities

Section III-A: Sources and Uses

Section III-B: Description of Non MTW Activities

SECTION III. NON MTW-RELATED HOUSING INFORMATION

A. Sources and Uses

A list of planned sources of other (non-MTW) HUD funds (excluding HOPE VI) follows. The uses of the funds are evident based upon the sources. Current-year funding is stated, because OHA does not have different estimates for the coming year at this point. Some of the sources listed, notably the Capital Fund formula American Reinvestment and Recovery Act (ARRA) funding, will not be recurring awards for 2012.

Vouchers for Non-Elderly Persons with Disabilities - \$751,632.00

HUD-VASH Vouchers - \$1,613,521.00

Vouchers for Single-Room Occupancy - \$487,092.00 (OHA is the Contract Administrator)

FSS Coordinator - \$0.00

Resident Opportunities and Supportive Services (ROSS) - \$200,000.00

Capital Fund Formula - ARRA funding - \$0.00

Operation of 456 low-income housing units other than public housing - \$268,529 monthly
(Gross potential rent - West Oaks/Jackson Court - Division Oaks/Antioch Manor)

B. Description of Non-MTW Activities

OHA operates the initiatives represented by the funding sources listed above. The 456 non-public housing low-income housing units are all rental housing, are described further below and consist of the 280-unit West Oaks development, the 101-unit Antioch Manor Section 202/8 development for the elderly, and the 75-unit Jackson Square/Division Oaks development. OHA also continues activities with respect to the Carver Park HOPE VI and has a pending \$22 million application for HOPE VI for its Lake Mann development.

During the Initial Demonstration Period, OHA was asked by HUD to manage the distressed Sanford Housing Authority (SHA). While OHA undertook this substantial effort successfully, the effort diverted valuable staff resources from the MTW implementation effort. OHA expects SHA administration to demand less staff attention during Year Two, allowing for additional concentration on the implementation of MTW.

TAB 4

Section IV: Long Term MTW Plan

SECTION IV. LONG -TERM MTW PLAN

Through the implementation of targeted activities and uses of funds, OHA will strive to achieve the maximum possible cost-effectiveness in the delivery of services and increase resident self-sufficiency and housing choices, given the amount of resources available.

With respect to cost-effectiveness, OHA's vision is to ensure that the valuable federal resources it receives are put to the best possible use - providing the most and highest-quality affordable housing and related services to the residents of the city of Orlando and Orange County, leveraging additional resources to provide the community with expanded affordable housing options and opportunities for economic independence. In addition to the current activities, future activities may include further rent simplification such as simplification of the medical expense deduction and streamlining of other processes such as procurement, asset management and utility billing.

With respect to self-sufficiency, OHA's vision is to implement a dynamic rent structure providing incentives for its families to sustain and increase earnings and employment, while retaining affordability. To accomplish this, OHA will support a comprehensive one-stop self-sufficiency resource center that provides and leverages resources to link its residents/clients to services throughout greater Orlando, helps residents prepare for and find jobs, facilitates access to convenient transportation to job centers during relevant hours, and provide childcare during non-traditional hours (evenings/nights/weekends). OHA's position is that all residents and clients receiving housing assistance who can work should receive the necessary support that will enable them to do so. A major challenge for OHA's MTW program will be to continue and expand upon the initial success of the self-sufficiency resource center, documented below, as coverage is expanded over the coming years to the full public housing and voucher programs.

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

With respect to all three MTW statutory goals, OHA will take every reasonable step to complete the greening of the Authority providing residents with training on reduced utility bills and ensuring a healthier living environment. OHA will also capitalize upon its partnership with the University of Central Florida for the evaluation of MTW progress, leading to timely improvement in MTW program throughout the course of the demonstration.

OHA's currently-approved MTW activities will contribute greatly to the achievement of this vision. In addition, there are two activities that OHA hopes to begin implementing during the third MTW year:

1. Provide a mechanism for elderly residents to obtain needed assisted living services with vouchers where possible, by allowing more flexibility in the rent rules so that residents can pay for services that for them are basic living expenses

2. Take advantage of the potential to use ACC resources, project-based vouchers or other resources to support strategic additions to the low-income stock

Activity 1: Expand assisted living options by allowing voucher-holders to pay more than 40% of their incomes

A. Description – OHA currently assists a number of frail elderly individuals who need assisted living services. OHA would give such individuals greater ability to obtain such services, by allowing them to expend more than 40% of their incomes for rent (including services) in assisted living facilities. Studies have shown that because assisted living facilities provide additional assistance such as meals, individuals can expend a much higher percentage of their incomes to pay for the assisted living package than 40%. The vouchers typically would be used in this manner in conjunction with Medicaid waivers used to pay for additional medical services; both resources, along with the tenant pay rents that would be authorized by this activity, are expected to be needed for access to assisted living and adequate services. Congress annually has authorized such an experiment in several Michigan counties for more than five years, but OHA is not aware that it has been tried elsewhere. OHA will prioritize assistance for individuals now living in public housing who clearly need additional assistance with daily living tasks.

B. Statutory Objective – Housing Choice.

C. Anticipated Impacts – To the extent vouchers can be used successfully in this manner, elderly individuals will be provided services they need. In some cases, their relocation to assisted living also will resolve difficult management problems in their former public housing developments. Concerns include the ability of individuals who need this service to afford and access assisted living facilities even with the proposed regulatory relief.

D./ E. Baseline and Benchmarks; Data Collection Metrics and Protocols

METRICS/PROTOCOLS	BASELINE	BENCHMARK
OHA will track the number of waivers it grants so that vouchers can be used for assisted living facilities and the number of assisted living facilities involved, and will require residents to report additional services received and satisfaction with the facilities annually	No vouchers are now used for assisted living	Serve 25 households in this manner by the fifth year of MTW

OHA also will track both the level of resident payments and its voucher costs associated with this activity.

F. Schedule - Within the first nine months of MTW Year 3, the Agency will take preliminary steps, including consultations with the Medicaid agency to obtain necessary waivers and outreach to individuals who may need services and assisted living facilities. A timetable and work plan for implementation will be based on the results of these and other fact finding and outreach efforts. The benchmark would be attained gradually over the three-year period.

Activity 2. Take advantage of reduced real-estate prices to acquire property for additional low-income housing

A. Description – To the extent opportunities and resources become available, OHA would use public housing ACC authority, project-based vouchers or MTW seed money to finance the acquisition and operation of additional low-income housing. Where possible, other funding sources such as low-income housing tax credits would be leveraged. Any acquisition or public housing units would be within the statutory cap.

B. Statutory Objective – housing choice; cost effectiveness

C. Anticipated Impacts – The anticipated impact will depend upon resources that become available.

D./ E. Baseline and Benchmarks; Data Collection Metrics and Protocols

METRICS/PROTOCOLS	BASELINE	BENCHMARK
<p>OHA will track the number of units acquired for affordable housing and the public housing, voucher or MTW resources used for such acquisitions, as well as other funds leveraged by this activity</p> <p>Cost savings through streamlined processes</p>	<p>No public housing or voucher funding has been used to purchase affordable housing</p> <p>No cost savings</p>	<p>At least 15 units over three years (to be adjusted as potential resources become available)</p> <p>Cost savings to be set depending on the specific processes used</p>

F. Schedule - OHA will plan for an initiative over a three-year MTW period that could produce at least 15 units. In the first MTW year of the activity, OHA will estimate development period time and expenses saved by use of MTW authorizations. OHA will review all potential resources and develop a plan for the maximum amount of acquisitions, taking into account other OHA resource commitments. OHA will endeavor to use all ACC authority for this purpose that is not otherwise committed.

TAB 5

Section V: Proposed MTW Activities

SECTION V. PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

OHA proposes no new MTW activities for Year Two. During Year Two, the Agency plans to continue implementing the approved Activities and Uses of Funds for the Initial Demonstration Period (see Section VI. A.), all of which are considered to be ongoing, many with multiple components to be phased in, and all involving follow-up activities and requiring evaluation over multiple fiscal years to determine whether established benchmarks/metrics and statutory purposes are being met. Section VI. B provides a status update on MTW Year 1 Activities and Uses of Funds, all of which are expected to be continued during Year 2.

TAB 6

Section VI: Ongoing Approved MTW Activities

Section VI-A: Activities from Prior Year Plan

SECTION VI. ONGOING MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED.

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

OHA MTW Activities and Uses of Funds

All of OHA's MTW Activities and Use of Funds actions, listed again below for convenience, were identified in the HUD-approved MTW Plan for the Initial Demonstration Period (January 1, 2011 to March 31, 2012).

MTW Activity 1:

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

MTW Activity 2:

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

MTW Activity 3:

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

MTW Activity 4:

Consolidate inspection and recertification requirements.

MTW Activity 5:

Provide Interim Voucher Assistance and Related Counseling to Prevent Foreclosure.

MTW Activity 6:

Partner with Central Florida Commission on Homelessness to provide a homeless/transitional housing facility.

MTW Activity 7:

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

MTW Use of Funds A:

Provide a comprehensive OHA 1-stop self-sufficiency resource center to promote use of single-fund flexibility.

MTW Use of Funds B:

Take every reasonable step to complete the greening of OHA.

MTW Use of Funds C

Provide for effective evaluation of MTW initiatives.

TAB 6

Section VI: Ongoing Approved MTW Activities

Section VI-B: Update on Status of Activities

SECTION VI B: PROVIDE AN UPDATE ON THE STATUS OF EACH ACTIVITY

Please see the following MTW Activity Tracking Matrix, coupled with narratives for some activities.

MTW Activities Tracking Matrix

Initial Demonstration Period (January 1, 2011 to March 31, 2012)

MTW Activity 1:

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

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 2 Expectation</u>
Initial year: implement rent floor for new family public housing admissions and at two sites, Ivey Lane and Citrus Square (\$225)	1/1/11 - new PH admission 2/1/11 - current PH sites	Implemented on schedule
Phase in over three years for public housing and in the fourth year for the voucher program, with adjustments as warranted by experience and analysis	Yr. 2 (4/2012)- Reeves (171), Griffin (171), Murchison (188), New PH Admissions Yr. 3 (4/2013) - Lake Mann (207), Omega (73), Marden Meadows (45), Carver Park (Villas-64, Landings -56), New PH Admissions Yr 4 (4/2014) - All Section 8 Participants and all new PH and Section 8 Admissions	The Year 2 challenge will be to expand the program to three more public housing developments. OHA is identifying residents that will be become subject to the next floor and shortly will begin the notification process to affected households
Require participation of households subject to the rent floor in self-sufficiency activities	Implement through self-sufficiency center as new households are subject to the rent floor	

OHA Implementation Steps

Timetable

Status and Year 2 Expectation

Provide hardship exemption process sensitive to economic conditions:

1/1/11

Completed

Establish hardship panel --
D. Council (or designee),
R. Pierce (or designee),
Resident Commissioner –
(Ms. Bruni Alfaro) or
designated Resident
Association President

Additional steps OHA is undertaking to accommodate expansion of this initiative include likely impact of expanded rent floor: current information indicates that 265 non-elderly, non-disabled households at the three additional developments will be subject to the Self-Sufficiency Rent Floor effective, April 1, 2012.

Establish rules and schedules

Of these 265 households, 50 have gross rents below \$225 and thus would be subject to the Rent Floor. Since these 50 households are currently paying less than minimum \$225 per month gross rent, they will be referred to the MTW Resource Center to participate in self-sufficiency activities and receive services designed to increase their income and/or earnings potential.

Information regarding these households is presented on pages 16 through 20 of this document which follow.

Metrics	Baseline (FY 09; from Year One Plan)	Benchmarks	Data Collection/Analysis Methods	Preliminary comments; may be discussed further in Annual MTW Report
Amount of income and earnings	<p>Total earnings of families with non-elderly, non-disabled adults initially covered by Rent Floor</p> <p>All public housing families: \$350,943*</p> <p>Covered Initial Year: \$159,978</p> <p>Covered Year Two (added April 2012): \$115,134 - (14 households)</p>	<p>Increase total earnings of families with non-elderly, non-disabled adults initially covered by Rent Floor by 5% each year, starting in the third MTW year</p>	<p>Will be collected from certification and recertification data</p>	<p>No impact expected yet</p>
Number of working adults and heads of households	<p>Number of working adults and heads of household</p> <p>All public housing families: 396 (Individuals) 388 (HOH)</p> <p>Covered Initial Year: 102 (Individuals) 98 (HOH)</p>	<p>Increase number of working adults and heads of household by 5% each year, starting in the third MTW year</p>	<p>Will be collected from certification and recertification data</p>	<p>No impact expected yet</p>

Voluntary loss of employment	Number of heads of household of families with non-elderly, non-disabled adults with voluntary loss of employment within first year of occupancy All move-ins: 26 (21%)	Decrease number of heads of household with voluntary loss of employment each year by 50%	Will be determined from recertification after the first year of occupancy	Initial numbers show few voluntary employment losses in the Initial Demonstration Period
Number of undeclared occupants who sign leases	Estimated number of undeclared occupants: 1 for every 2 households All families: 289 Covered initial year: 109	Reduce number of undeclared occupants by 10% annually	Will be tracked as this occurs and through annual recertifications	OHA is having difficulty tracking this and is considering changing the metric in the MTW Report, possibly to new adult household numbers other than the head of household who identify themselves
Number of staff minutes spent on recertifications	All families: 229,730 for public housing Covered Initial Year: 36,563	Reduce staff minutes spent on recertifications by 10%	Will be estimated by staff studies	
Average earnings of families with non-elderly, non-disabled adults initially covered by Rent Floor	All families: \$3,000* Covered Initial Year: Citrus & Ivey \$4,102	Increase average earnings of families with non-elderly, non-disabled adults initially covered by Rent Floor by 5% each year, starting in the third MTW year	Will be collected from certification and recertification data	

*Does not include Carver development

**For Carver development, only earnings regarding heads of household is available.

The following table indicates the impact of extending the Rent Floor to households residing at Reeves, Griffin and Murchison developments. In summary, 265 households have at least one non-elderly, non-disabled member and are thus potentially subject to coverage by the Rent Floor. Of these, 50 (18.87%) have gross rents below \$225 and thus actually would be subject to the Rent Floor. The Table provides a breakdown by race, bedroom size and ethnicity. The data provided in the Table indicates that among these 265 households, 179 (67.55) are Black, 71 (26.79%) are White and 15(5.66%) are from all other racial groups. None of those categorical breakdowns indicate a substantially disproportionate impact on a protected class: 32 of 179 (18.6%) of Black households, 14 of 71 (19.7%) White households, 20 of 133 (15.04%) large (3 or more)-bedroom households and 17 of 89 (19.1%) of households classified as “Hispanic” rather than “Non-Hispanic” (such households also were included in the “Race” classifications) potentially subject to coverage are projected actually to be subject to the Rent Floor. The largest potential monthly rent increase would be \$85, with three such increases above \$50.

Gross Rent	# Family	Gross Rent	Race	# Family	Gross Rent	Bed Size	# Family	Gross Rent	Ethnicity	# Family
140	1	302	ASIAN/P	1	247	0	2	171	HISPANIC	1
168	1	327	ASIAN/P	1	171	1	1	177	HISPANIC	1
171	1	329	ASIAN/P	1	245	1	1	179	HISPANIC	1
176	1	393	ASIAN/P	1	255	1	1	182	HISPANIC	1
177	1	140	BLACK	1	302	1	1	188	HISPANIC	1
178	3	168	BLACK	1	328	1	3	189	HISPANIC	1
179	1	176	BLACK	1	329	1	5	190	HISPANIC	2
182	1	178	BLACK	3	348	1	1	196	HISPANIC	1
183	1	183	BLACK	1	140	2	1	201	HISPANIC	1
185	4	185	BLACK	3	168	2	1	203	HISPANIC	1
187	1	187	BLACK	1	176	2	1	204	HISPANIC	1
188	1	189	BLACK	2	177	2	1	206	HISPANIC	1
189	2	190	BLACK	2	178	2	2	212	HISPANIC	1
190	4	195	BLACK	1	179	2	1	213	HISPANIC	1
195	1	196	BLACK	2	182	2	1	215	HISPANIC	1
196	3	198	BLACK	1	183	2	1	218	HISPANIC	1
198	1	203	BLACK	1	185	2	4	225	HISPANIC	2
201	2	205	BLACK	3	187	2	1	233	HISPANIC	1
203	1	206	BLACK	1	188	2	1	250	HISPANIC	1
204	1	210	BLACK	1	190	2	3	253	HISPANIC	1
205	4	211	BLACK	2	196	2	2	254	HISPANIC	1
206	2	212	BLACK	2	198	2	1	256	HISPANIC	1
210	1	213	BLACK	1	204	2	1	259	HISPANIC	1
211	2	220	BLACK	1	205	2	1	270	HISPANIC	1
212	3	224	BLACK	1	210	2	1	291	HISPANIC	1
213	2	225	BLACK	3	212	2	2	306	HISPANIC	1

Gross Rent	# Family	Gross Rent	Race	# Family	Gross Rent	Bed Size	# Family	Gross Rent	Ethnicity	# Family
215	1	227	BLACK	1	213	2	1	308	HISPANIC	1
218	1	228	BLACK	1	215	2	1	313	HISPANIC	2
220	1	229	BLACK	2	218	2	1	314	HISPANIC	1
224	1	232	BLACK	2	225	2	2	317	HISPANIC	1
225	5	233	BLACK	1	227	2	1	321	HISPANIC	1
227	1	239	BLACK	1	232	2	1	327	HISPANIC	2
228	1	242	BLACK	2	233	2	1	329	HISPANIC	2
229	2	245	BLACK	2	239	2	1	334	HISPANIC	1
232	2	246	BLACK	2	242	2	1	339	HISPANIC	1
233	2	247	BLACK	2	250	2	1	342	HISPANIC	1
239	1	254	BLACK	2	270	2	1	343	HISPANIC	2
242	2	255	BLACK	1	271	2	1	353	HISPANIC	2
245	2	256	BLACK	1	272	2	1	356	HISPANIC	1
246	2	265	BLACK	1	278	2	1	357	HISPANIC	1
247	2	268	BLACK	1	280	2	1	363	HISPANIC	1
250	1	270	BLACK	1	287	2	1	366	HISPANIC	8
253	1	271	BLACK	1	290	2	1	369	HISPANIC	1
254	2	272	BLACK	1	297	2	1	372	HISPANIC	4
255	1	276	BLACK	1	306	2	1	380	HISPANIC	1
256	2	277	BLACK	1	308	2	1	390	HISPANIC	1
259	1	278	BLACK	3	313	2	1	393	HISPANIC	1
265	1	280	BLACK	1	317	2	1	398	HISPANIC	1
268	1	281	BLACK	1	327	2	10	404	HISPANIC	1
270	2	282	BLACK	1	330	2	1	407	HISPANIC	1
271	1	287	BLACK	2	331	2	1	408	HISPANIC	1
272	1	290	BLACK	1	333	2	1	410	HISPANIC	1
276	1	292	BLACK	1	339	2	1	411	HISPANIC	1
277	1	299	BLACK	1	342	2	1	412	HISPANIC	2
278	3	308	BLACK	1	352	2	2	418	HISPANIC	1
280	1	312	BLACK	2	353	2	1	441	HISPANIC	13
281	1	323	BLACK	1	357	2	1	510	HISPANIC	2
282	1	324	BLACK	2	363	2	1	603	HISPANIC	1
287	2	325	BLACK	1	364	2	1	140	NON/HISPANIC	1
290	1	326	BLACK	1	366	2	17	168	NON/HISPANIC	1
291	1	327	BLACK	7	369	2	1	176	NON/HISPANIC	1
292	1	328	BLACK	4	372	2	18	178	NON/HISPANIC	3
297	1	329	BLACK	2	389	2	1	183	NON/HISPANIC	1
299	1	330	BLACK	1	390	2	1	185	NON/HISPANIC	4
302	1	331	BLACK	1	393	2	1	187	NON/HISPANIC	1

Gross Rent	# Family	Gross Rent	Race	# Family	Gross Rent	Bed Size	# Family	Gross Rent	Ethnicity	# Family
306	1	333	BLACK	1	403	2	1	189	NON/HISPANIC	1
308	2	334	BLACK	1	408	2	1	190	NON/HISPANIC	2
312	2	335	BLACK	1	410	2	1	195	NON/HISPANIC	1
313	2	343	BLACK	13	411	2	1	196	NON/HISPANIC	2
314	1	348	BLACK	1	412	2	1	198	NON/HISPANIC	1
317	1	352	BLACK	2	434	2	1	201	NON/HISPANIC	1
321	1	356	BLACK	3	448	2	1	205	NON/HISPANIC	4
323	1	363	BLACK	2	482	2	1	206	NON/HISPANIC	1
324	2	364	BLACK	1	178	3	1	210	NON/HISPANIC	1
325	1	366	BLACK	8	189	3	1	211	NON/HISPANIC	2
326	1	369	BLACK	1	190	3	1	212	NON/HISPANIC	2
327	10	370	BLACK	1	195	3	1	213	NON/HISPANIC	1
328	4	372	BLACK	15	196	3	1	220	NON/HISPANIC	1
329	5	388	BLACK	1	201	3	1	224	NON/HISPANIC	1
330	1	389	BLACK	1	203	3	1	225	NON/HISPANIC	3
331	1	390	BLACK	1	205	3	3	227	NON/HISPANIC	1
333	1	393	BLACK	1	206	3	2	228	NON/HISPANIC	1
334	2	403	BLACK	1	211	3	2	229	NON/HISPANIC	2
335	1	406	BLACK	1	212	3	1	232	NON/HISPANIC	2
339	1	412	BLACK	1	213	3	1	233	NON/HISPANIC	1
342	1	420	BLACK	1	224	3	1	239	NON/HISPANIC	1
343	14	434	BLACK	1	225	3	3	242	NON/HISPANIC	2
348	1	439	BLACK	1	229	3	2	245	NON/HISPANIC	2
352	2	441	BLACK	12	232	3	1	246	NON/HISPANIC	2
353	2	444	BLACK	1	233	3	1	247	NON/HISPANIC	2
356	3	448	BLACK	1	242	3	1	254	NON/HISPANIC	1
357	1	482	BLACK	1	246	3	1	255	NON/HISPANIC	1
363	2	510	BLACK	2	253	3	1	256	NON/HISPANIC	1
364	1	511	BLACK	2	254	3	2	265	NON/HISPANIC	1
366	17	563	BLACK	2	256	3	1	268	NON/HISPANIC	1
369	1	782	BLACK	1	259	3	1	270	NON/HISPANIC	1
370	1	868	BLACK	1	265	3	1	271	NON/HISPANIC	1
372	18	357	HW/PI	1	268	3	1	272	NON/HISPANIC	1
380	1	177	OTHER	1	270	3	1	276	NON/HISPANIC	1
388	1	188	OTHER	1	276	3	1	277	NON/HISPANIC	1
389	1	201	OTHER	2	277	3	1	278	NON/HISPANIC	3
390	1	259	OTHER	1	278	3	2	280	NON/HISPANIC	1
393	2	270	OTHER	1	281	3	1	281	NON/HISPANIC	1
398	1	321	OTHER	1	282	3	1	282	NON/HISPANIC	1

Gross Rent	# Family	Gross Rent	Race	# Family	Gross Rent	Bed Size	# Family	Gross Rent	Ethnicity	# Family
403	1	327	OTHER	1	287	3	1	287	NON/HISPANIC	2
404	1	366	OTHER	1	291	3	1	290	NON/HISPANIC	1
406	1	441	OTHER	1	312	3	2	292	NON/HISPANIC	1
407	1	171	WHITE	1	313	3	1	297	NON/HISPANIC	1
408	1	179	WHITE	1	314	3	1	299	NON/HISPANIC	1
410	1	182	WHITE	1	321	3	1	302	NON/HISPANIC	1
411	2	185	WHITE	1	324	3	2	308	NON/HISPANIC	1
412	2	190	WHITE	2	325	3	1	312	NON/HISPANIC	2
418	1	196	WHITE	1	326	3	1	323	NON/HISPANIC	1
420	1	204	WHITE	1	328	3	1	324	NON/HISPANIC	2
434	1	205	WHITE	1	334	3	2	325	NON/HISPANIC	1
439	1	206	WHITE	1	335	3	1	326	NON/HISPANIC	1
441	24	212	WHITE	1	343	3	14	327	NON/HISPANIC	8
444	1	213	WHITE	1	353	3	1	328	NON/HISPANIC	4
448	1	215	WHITE	1	363	3	1	329	NON/HISPANIC	3
482	1	218	WHITE	1	370	3	1	330	NON/HISPANIC	1
510	3	225	WHITE	2	380	3	1	331	NON/HISPANIC	1
511	2	233	WHITE	1	388	3	1	333	NON/HISPANIC	1
563	2	250	WHITE	1	393	3	1	334	NON/HISPANIC	1
603	1	253	WHITE	1	398	3	1	335	NON/HISPANIC	1
782	1	256	WHITE	1	406	3	1	343	NON/HISPANIC	12
868	1	291	WHITE	1	407	3	1	348	NON/HISPANIC	1
265		297	WHITE	1	411	3	1	352	NON/HISPANIC	2
		306	WHITE	1	418	3	1	356	NON/HISPANIC	2
		308	WHITE	1	439	3	1	363	NON/HISPANIC	1
		313	WHITE	2	441	3	24	364	NON/HISPANIC	1
		314	WHITE	1	444	3	1	366	NON/HISPANIC	9
		317	WHITE	1	603	3	1	370	NON/HISPANIC	1
		327	WHITE	1	782	3	1	372	NON/HISPANIC	14
		329	WHITE	2	868	3	1	388	NON/HISPANIC	1
		334	WHITE	1	189	4	1	389	NON/HISPANIC	1
		339	WHITE	1	201	4	1	393	NON/HISPANIC	1
		342	WHITE	1	220	4	1	403	NON/HISPANIC	1
		343	WHITE	1	228	4	1	406	NON/HISPANIC	1
		353	WHITE	2	245	4	1	411	NON/HISPANIC	1
		366	WHITE	8	246	4	1	420	NON/HISPANIC	1
		372	WHITE	3	256	4	1	434	NON/HISPANIC	1
		380	WHITE	1	292	4	1	439	NON/HISPANIC	1
		398	WHITE	1	299	4	1	441	NON/HISPANIC	11

Gross		#	Gross	Bed	#	Gross		#
Rent	Race	Family	Rent	Size	Family	Rent	Ethnicity	Family
404	WHITE	1	308	4	1	444	NON/HISPANIC	1
407	WHITE	1	323	4	1	448	NON/HISPANIC	1
408	WHITE	1	356	4	3	482	NON/HISPANIC	1
410	WHITE	1	404	4	1	510	NON/HISPANIC	1
411	WHITE	2	412	4	1	511	NON/HISPANIC	2
412	WHITE	1	420	4	1	563	NON/HISPANIC	2
418	WHITE	1	510	4	3	782	NON/HISPANIC	1
441	WHITE	11	511	4	2	868	NON/HISPANIC	1
510	WHITE	1	563	5	2			
603	WHITE	1						

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MTW Activity 2:

Streamline the recertification process in the public housing and voucher programs

OHA Implementation Steps

Recertify elderly/disabled - all sites every three years, with annual adjustments for fixed-income program cost of living increases

Timetable

Initial Year 2011 (15 months): - all sites
Recertify Yr. 4 (4/2014) and Yr. 7 (4/2017)

Status and Year 2 Expectation

Initial recertifications are completed for public housing residents and in progress for voucher program participants.
Year 2 will be the first year in which elderly and disabled households are not recertified, and staffing adjustments are made accordingly.

Metrics	Baseline (FY 09; from Year One Plan)	Benchmarks	Data Collection/Analysis Methods	Preliminary comments; may be discussed further in Annual Report
Number of staff minutes spent on rent calculations and recertifications for public housing and voucher programs with elderly and-disabled households	224,182 minutes	Reduce staff minutes spent on rent calculations and recertifications by 50% for households with no non-elderly, non-disabled adults (limited savings in the first year)	Staff studies; also, total incomes to be examined at full reexamination dates to determine differences relative to interim estimates	Savings will occur commencing in Year 2, when recertifications of elderly and disabled households begin to be limited

MTW Activity 3:

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

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 2 Expectation</u>
Disregard first \$25,000 in assets	Initial MTW Year	Implemented 2/1/11 for public housing, 4/1/11 for Section 8
Modify written third-party verification process except on a limited audit basis (5%)		Completed; the third party verification policy/process was modified based on recommendations of the Agency's MTW Working Group composed on executive and senior level management staff responsible for implementation of the MTW Program. In addition to continuing to use information obtained through EIV to verify and monitor income, residents/clients/applicants will be required to submit official documentation of earned, unearned income, irregular and other forms income, assets, deductions and exemptions. Staff will continue to use the employment verification form, allowing residents/clients/applicants to bring in the completed form. Staff will call the employer to verify information contained in the completed form. If there is any in doubt regarding the authenticity/veracity of any of information provided by the resident/ client/applicant, staff will use the traditional established third-party verification protocol for conformation purposes.
Define acceptable means of verification		These modifications will be applied fully throughout Year Two

Metrics	Baseline (FY'09 from Year One Plan)	Benchmarks	Data Collection/Analysis Methods	Preliminary comments; may be discussed further in Annual Report
Number of staff minutes spent on rent calculations and recertifications for public housing and voucher programs with elderly and-disabled households	338,730 minutes	Reduce staff minutes spent on rent calculations and recertifications by 50% for households with no non-elderly, non-disabled adults and by 10% for other households	Staff studies; financial reports to indicate revenue loss from income disregard	
Number of staff minutes spent on third-party verifications:	124,980 minutes	Reduce staff minutes spent on third party verifications by 50%		
Time to complete recertifications	90 days	Reduce to 60 days		Average time appears to have dropped; will be reported upon in Annual MTW Report

MTW Activity 4:

Consolidate inspection and recertification requirements

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year Two Expectation</u>
Use Housing Quality Standards as housing condition evaluation standard for both the public housing and the voucher programs, following HUD approval of protocol for modifying HQS (develop a rating standard without losing eligibility for Capital Fund bonus for PHAS high performers)	Recertification: Implement in FY 2012	A plan for consolidated for recertifications of all public housing residents and elderly/disabled Section 8 clients based on geographic location has been developed With respect to inspections, a consultant is to be hired 2/12 to develop a protocol
Use inspection and recertification schedules for both programs based on geographic location, rather than date of initial receipt of assistance	Inspections (TBD)	This Activity will be implemented following receipt of HUD approval of the modified inspection protocol/forms

Metrics	Baseline (FY'09 from Year One Plan)	Benchmarks	Data Collection/Analysis Methods	Preliminary comments; may be discussed further in Annual Report
Number of staff minutes spent on the following: recertifications inspections, or contract costs	Recertifications (staff minutes): 383,730 Inspections-- Staff minutes for vouchers (annual inspections: 154,500) UPCS contract costs for public housing: \$15,874	Reduce staff minutes (Section 8) or contract costs (UPCS-public Housing) spent on recertifications and inspections by 20%	Staff minutes/days spent on recertifications will be estimated by staff studies Inspection contract and/or staff costs will be tracked directly	MTW PHAs' effort to develop alternative evaluation system may be relevant to implementation

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

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 2 Expectation</u>
Amend the Section 8 Housing Choice Voucher Administrative Plan to include allocation of fifty interim vouchers (six months) for Foreclosure Prevention Program	May 20, 2011	Completed
Meet with local government housing staff to discuss MTW Foreclosure Prevention Program, procedures and guidelines	March 2010	Completed
Contact other HUD Certified Counseling Agencies for possible participation in the MTW Foreclosure Prevention Program	August 10, 2011 October 2011 - April 2012	Ongoing
Establish criteria for selection of Interim HCV recipients	May 15, 2012	
Establish procedures and guidelines for implementation, monitoring and counseling for Foreclosure Prevention Program	June 1, 2012	
Develop standard forms to assist in implementation (referral forms, HCV forms)	June 30, 2012	
Commence offering vouchers	July 31, 2012	

The implementation phase of this Activity is scheduled to commence July 31, 2012 and will continue throughout the remainder of Year 2, ending 3/31/13. OHA now anticipates partnerships with non-profit HUD Certified Counseling Agencies, rather than the City of Orlando, which has no more funding available for the program.

Metrics	Baseline (FY'09 from Year One Plan)	Benchmarks	Data Collection/Analysis Methods	Preliminary comments; may be discussed further in Annual Report
Number of homeowners assisted with interim vouchers and counseling	Number of homeowners currently provided foreclosure prevention interim vouchers and counseling by OHA: 0	Assist 50 homeowners at any time; prevent foreclosure in 40 cases.	OHA will track the number and percentage of foreclosures among the assisted households for one year after interim assistance ends.	
			The percentage of foreclosures will be compared with that of unassisted homeowners in similar situations to the extent data is available.	

MTW Activity 6:

Partner with Central Florida Commission on Homelessness to provide homeless/transitional housing facility (50 1-bedroom public housing units with supportive services to be phased in at West Oaks development, for transitional housing of up to eighteen months).

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 2 Expectation</u>
Execute MOU with services provider, specifying responsibilities of OHA and the services provider.	6/30/12	The MOU has been drafted and discussed with the expected provider, Wayne Densch Center.
Arrange for subordination of current lien to provide for public housing Declaration of Trust in first position.	1/31/12	OHA has provided the loan servicer, Wells Fargo, requested information regarding its plans for West Oaks. Wells Fargo has procured Velocity Consulting to perform a physical needs assessment, which was completed in November 2011.
Negotiate with Fannie Mae and Wells Fargo for placement of ACC authority and Declaration of Trust in first position.	3/31/12	Initial discussions with Fannie Mae suggest that it may not allow ACC units to be placed at West Oaks. As an alternative, OHA will submit an amendment to the MTW Plan for Year 2 requesting approval of a waiver of regulations to project-base 50 Section 8 vouchers at West Oaks.
Submit a request to the HUD MTW Office for approval to Amend OHA's MTW Year 2 Plan to secure necessary waivers of regulations to Project-Base 50 Section 8 Vouchers at West Oaks.	7/30/12	Request to amend OHA's MTW Plan for Year 2 submitted to the HUD MTW Office.
Secure HUD approval to Project-Base 50 Section 8 Vouchers at West Oaks.	8/30/12	HUD approval of MTW Plan amendment secured.
Implement MOU with the Wayne Densch Center to provide screening, referral, case management & other support services for up to 50 homeless households.	10/31/12	House a minimum of 5 homeless households referred by the Wayne Densch Center.

Metrics	Baseline (FY'09 from Year One Plan)	Benchmarks	Data Collection/Analysis Methods	Preliminary comments; may be discussed further in Annual Report
Admission rates for the households	Number of transitional units for the homeless currently provided by OHA: 0	Complete the conversion of 50 units to Project- Based Section 8 Vouchers and have supportive services in place to serve up to 50 households, serving at least 5 by 10/31/12	Will be tracked by OHA (housing) or the Commission (services)	
Number of working adults Average household earnings	Number of assisted households that obtain employment and/or increased earnings: 0	At least 80% of households obtain employment and/or increase earnings prior to termination of housing assistance	Will be collected by certification and recertification data	
			OHA will require that households report housing and employment/earnings status for two years after the transitional period (service provider to track households) OHA also will track times to reach development milestones, public housing development costs and services provided to households	

MTW Activity 7:

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

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 2 Expectation</u>
Agree upon a site	6/30/12	In discussions with City of Orlando regarding possible options, including a partnership with Carver Theater Developers. See notes below:
City of Orlando agreement on disposition of Jackson Court	1/31/2013	
Architectural Planning Development/Financing Closing Commit 45 PBV Construction period Begin occupancy	All of these dates are TBD	

OHA and the City of Orlando (City) have been in discussion regarding the redevelopment of Jackson Court. The President/CEO of the OHA has met with officials of the City and the Black Business Investment Fund (BBIF) to discuss incorporating the redevelopment of Jackson Court into their Carver Theatre Restoration Project. OHA plans to enter into a partnership with Carver Theatre Developers to replace the Jackson Court units within their new proposed development of 100 units of senior mixed income housing located in the Parramore area of the City of Orlando. OHA has executed a Memorandum of Understanding with the Caver Park Theatre Developers with a commitment to provide a minimum of 45 project-based vouchers for the seniors that would be displaced through the redevelopment plan. These 45 vouchers will come from OHA's existing voucher allocation which becomes available at the time the newly redeveloped housing units are ready for occupancy.

Metrics	Baseline (FY'09 from Year One Plan)	Benchmarks	Data Collection/Analysis Methods	Preliminary comments; may be discussed further in Annual Report
	Number of units in present building: 75	Increase number of units by approximately 20 units; complete new development, including approximately 45 units with project-based vouchers. Successfully relocate current residents (complete within three years)	Staff will track	
Cost savings from eliminating PBV competitive process	No cost savings	Estimated staff and related costs of PBV competitive process: \$50,000	Staff estimate	

MTW Use of Funds A:

Provide comprehensive OHA 1-stop self-sufficiency resource center to promote use of single-fund flexibility

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 2 Expectation</u>
Refurbish building as needed and operate the center	Commence initial MTW year	Completed 1/1/11
Hire a Job Recruiter, assisted by counselors, to assist with overcoming employment barriers and job placement and to facilitate use of local services	Commence Initial MTW year	Recruiter hired 1/1/11
Offer job readiness services including linkages with basic education resources	Commence Initial MTW year	Commenced 1/1/11 OHA has developed and maintains partnership with the following agencies to provide job readiness services, including linkages with basic education resources: <ol style="list-style-type: none"> 1. Life Stride – Orlando County Public School (OCPS) 2. Orlando Vocational Tech. 3. Mid Florida Vocational Tech. 4. Goodwill Industries (Job Club) 5. ESOL Programs (Orlando Vocational Tech)
Complete specific arrangements with childcare providers	Commence Initial MTW Year	Commenced 01/30/2011 The Orlando Housing Authority (OHA) has developed partnerships with the following providers: <ol style="list-style-type: none"> 1. Academy 200 Inc. 2. Florida Children’s Academy 3. Advanced Beginnings Childcare Development Center Inc. (ABCD) Childcare Center 4. RAE’S Kidz & Little RAE’S Inc.

Develop partnership with Central Florida Regional Transportation Authority (LYNX) to provide off-hour transportation to major job sites, particularly where not centrally located

Initial MTW
Year

Staff has had initial discussions with LYNX

Potential implementation to provide off-hours transportation. Projected completion of MOU date is March 2012. Thus, this initiative should be fully implemented for Year 2. The MTW program continues to provide bus tickets to MTW participants

Bring in additional services from current partners

The Orlando Housing Authority (OHA) has developed partnerships with several local service providers, such as Harbor House (Domestic Abuse program). OHA will continue seeking and partnering with additional local social services agencies to continue finding creative new ways and meaningful opportunities for participants to advance educationally, economically and socially

Develop specific linkages and programs with large employers Initial MTW Year

The OHA has developed and maintains partnership with the following Business Partners:

1. Lowes Hotel
2. Peabody Hotel Orlando
3. Rosen Hotel & Resorts
4. Panera Bread Company
5. Wet n Wild
6. Select Staffing
7. Sheet Metal Workers Local Union # 15
8. CFL Pizza Hut
- 9 .ARAMARK
10. Central Florida
11. Employment Council
12. Christian Help
13. Dade Paper
14. Expedia Local Expert Destination Services
15. Goodwill Industries of Central Florida, Inc.
16. Hilton Grand Vacations
17. Mc Donald's
18. Nickelodeon Suites
19. Orange County Sheriff's Office
20. Top Talent Staffing
21. Workforce of Central Florida (Job Vantage)

Require families subject to rent floor to participate in self-sufficiency activities

MTW participants are referred by site managers for the self-sufficiency assessment and case management

Moving To Work 2011 Quarterly Reports:

JANUARY 2011-March 2011

1. Total MTW clients case-managed during this period:	39
2. Total MTW clients employed during this period:	07

APRIL 2011-JUNE 2011

1. Total MTW clients case-managed during this period:	83
2. Total MTW clients employed during this period:	13

JULY 2011- SEPTEMBER 2011

1. Total MTW clients case-managed during this period:	90
2. Total MTW clients employed during this period:	20

The quarterly reports show numerically the great progress made by the self-sufficiency resource center; discussions with the affected residents give a better sense of the dramatic impact this initiative is making. As highlighted earlier, the Year 2 challenge will be to increase this success proportionately with the coverage by the Rent Floor of three additional public housing developments.

MTW Use of Funds B:

Take every reasonable step to complete the greening of OHA

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 2 Expectation</u>
Work with Enterprise Community Partners to identify remaining steps	Start Initial MTW Year (1/1/11-3/31/12)	Staff has had initial discussion with Enterprise Potential implementation measures include training of residents in energy conservation (annually), conduct of further energy audit assessments, testing for radon and mold to determine health of environment within public housing units, and use of solar energy to offset costs and reduce consumption OHA has issued a Purchase Order/Contract to Elite Mold Services, Inc. to conduct Air Quality Testing at all OHA Public Housing Sites.
Consult with Architects Unlimited on research and analyses completed for OHA sites		At minimum, OHA during Year 2 will implement as feasible any steps indicated to be necessary by the air quality testing, as well as the resident energy conservation education program
Review existing energy efficiency/conservation analyses completed for OHA sites		
Develop strategy to improve energy efficiency at OHA sites		
Assess status of mold issues at OHA sites (past reports, resident complaints, etc.)		
Develop a energy conservation education program for residents		

OHA Implementation Steps

Secure baseline utility bill information on targeted OHA sites and/or sampling of units

Implement educational program

Track annual utility consumption of residents

Investigate green practices for OHA administration (e.g., paperless information sharing, paper, can/bottle recycling program, etc.)

MTW Use of Funds C:

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

<u>OHA Implementation Steps</u>	<u>Timetable</u>	<u>Status and Year 2 Expectation</u>
Meet with University of Central Florida (UCF) officials to clarify baseline data and benchmarks and to develop evaluation plan (criteria, protocols & timelines)	Complete by 10/1/11	OHA has held three meetings (6/11, 7/11, 9/11) with representatives of UCF's Sociology Department to review the proposed baseline data and benchmarks and MTW Plan activities and summarize progress. The July 2011 meeting included a review of a proposed MOU between OHA and UCF establishing evaluation criteria, protocols and processes and other elements of conducting the evaluation and preparing reports on OHA's MTW progress A UCF Evaluation Team member attended the 10/25/2011 HUD MTW site visit The UCF Department of Sociology evaluation team completed its review of planned MTW Activities/Uses of Funds, baseline, benchmarks, data elements and Activity Track. On 9/27/11, OHA received a letter from the UCF Evaluation Team indicating that these program elements provided a "comprehensive, manageable framework, appropriate for use in evaluating the MTW Demonstration Program to be implemented at OHA."
Receive annual evaluation and recommendations from University of Central Florida		The Memorandum of Understanding (MOA) with UCF for Evaluation of MTW Activities 1-7 and Use of Funds Actions A & B was executed 9/14/2011. The report covering the Initial Demonstration Period is due May 24, 2012
Promptly implement recommendations as appropriate		

OHA's key activity for Year 2 will be to respond to the initial Evaluation Report. Depending on the recommendations, OHA may need to refine data collection and evaluation methods or make more fundamental changes, possibly including revisions to MTW activities that could require amendments to the current or future MTW Plans.

TAB 6

Section VI: Ongoing Approved MTW Activities

Section VI-C:

**Proposed Changes for Which Modifications
to Attachment C of the MTW Agreement with HUD
is Required**

Section VI. C: For the Plan Year, indicate if the Agency anticipates any changes, modifications or additions to Attachment C Authorizations

Not Applicable. No such changes or new authorizations are being requested.

TAB 6

Section VI: Ongoing Approved MTW Activities

Section VI-D:

Describe if the Agency is Using Outside Evaluators

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

As stated in our application to HUD for designation as a Moving to Work (MTW) agency, in our approved MTW plan for the Initial Demonstration Period and above, OHA is partnering with the University of Central Florida (UCF) to have UCF reviewers conduct an objective external evaluation of planned MTW activities and uses of funds. OHA has obligated \$30,000 for the conduct of the initial independent evaluation by UCF reviewers covered by OHA's Memorandum of Agreement (MOA) with UCF for the Evaluation of MTW Activities 1 through 7 and Use of Funds Actions A and B. OHA expects to review and update the MOA annually.

As stated above, the MOA stipulates that UCF will complete its evaluation and submit a report of findings, along with recommendations for changes in programming to OHA on or before May 24, 2012. The report will contain an overall assessment of progress made by OHA in meeting established program benchmarks for the seven MTW Activities and MTW Use of Funds Actions A and B to be implemented during the initial 15-month demonstration period. The evaluation report also will contain an assessment of the impact of program changes on self-sufficiency resource center participants.

OHA will address all of UCF's program recommendations within three months of receipt of the Evaluation Report. This initiative is designed to encourage timely changes in programming to make planned activities and uses of funds more effective in meeting OHA goals and statutory purposes of the MTW Demonstration Program.

TAB 7

Section VII: Sources and Uses of Funds

Section VII-A: List of Planned Sources

Section VII-B: List of Planned Sources of State and Local Funds

Section VII-C: List of Planned Sources of COCC

Section VII-D: Use of Cost Allocation or Fee-for-Services Approaches

Section VII-E: Single Fund Flexibility

Section VII-F: List of Reserve Balances at the Beginning of Year (Optional)

Section VII-G: Sources and Uses of Funds by AMP (Optional)

SECTION VII. SOURCES AND USES OF FUNDS

A. Planned Sources and Uses of MTW Funds

CONSOLIDATED SOURCES AND USES OF MTW FUNDS		
REVENUE (SOURCES)		
PH Operating Subsidy and Rent	\$8,440,514	
Public Housing Capital Fund Program	\$ 2,503,775	
Housing Choice Vouchers (not special purpose)	\$22,942,679	
TOTAL REVENUE (available for MTW)		\$33,886,968
EXPENSE (USES)		
General Administration/Maintenance	\$12,109,074	
Public Housing Capital Expenditure	\$ 1,482,906	
Housing Assistance Payments	\$19,154,988	
MTW activities (maximum amount; specific uses are enumerated below)	\$ 760,000	
Foreclosure Prevention, Activity 5 (up to 50 vouchers)	\$ 380,000	
TOTAL EXPENSE		\$33,886,968
NET INCOME/LOSS		\$0

The above statement is based on CY 2011 funding level. All vouchers transferred from Sanford Housing Authority are included.

B. Planned Sources and Uses of State or Local Funds

OHA does not receive or administer state or local funds. Several elements of OHA's MTW Plan, however, have strong linkages with other state, local or federal initiatives. The self-sufficiency resource center's efforts will be fully integrated with other local self-sufficiency efforts, such as those of the local Workforce Investment Act entity, Work Force Central Florida; the local welfare department; the Department of Families and Children; and the Orange County Public Schools; and will build upon the collaborations already developed with other agencies by OHA's Family Services Department. The foreclosure prevention assistance initiative and the homeless/transitional housing initiative will complement the previous City's foreclosure prevention efforts, and the homeless/transitional housing will rely on supportive services to be provided through the Central Florida Commission on Homelessness. The new low-income

housing for the elderly is anticipated to be developed partly through use of low-income housing tax credits allocated through the Florida Housing Finance Corporation.

OHA's application for MTW designation explained in depth the role of thirteen OHA partners in planned MTW Activities and Uses of Funds. These partners are listed below; the self-sufficiency resource center has developed additional partnerships since the commencement of implementation:

Florida Department of Children and Families

Workforce Central Florida

Goodwill Industries of Central Florida

Frontline Outreach

Community Coordinated Child Care

Florida Department of Health

City of Orlando

Central Florida Commission on Homelessness

University of Central Florida

Central Florida Regional Transportation Authority (LYNX)

Orange County Public Schools

Valencia Community College

Enterprise Community Partners

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

OHA will continue to use COCC funds for public housing.

D. Alternative Cost Allocation or Fee for Service Methodology

Not applicable.

E. Use of Single-Fund Flexibility

OHA carefully has reviewed its potential sources and uses of funds for MTW activities. OHA will continue to commit funding for up to 100 vouchers to fund the self-sufficiency resource center in the second year of MTW. The funding will be made available through attrition from the voucher program.

OHA is acutely aware of the serious tradeoffs involved in not using these funds to serve 100 families with vouchers, and has made the judgment that MTW activities it can fund from these sources will provide greater benefit for the households in need of OHA's services. Emphasis will be on activities related to self-sufficiency that have leveraging or leveraging potential, as well as a contingency for green-related activities such as resident training. OHA anticipates the use of these funding sources for MTW activities would continue on an annual basis if needed and if the MTW activities are effective.

OHA also is aware of its MTW obligation to continue to assist substantially the same total number of eligible low income families as would have been served had funding amounts not been combined. In that connection, OHA again brings to HUD's attention that its number of families served in the voucher program has been dropping as a result of an extraordinary number of reasonable accommodations requests, which result in additional subsidy expended per family. If the growth in such requests continues, the number of families served will be reduced irrespective of any impact of MTW.

The currently-budgeted MTW activities include contingencies for partnership-related and green activities. If not all of the budgeted funds are needed, OHA may use the remaining funds for additional vouchers. On the other hand, if more funds than \$760,000 are needed, OHA could decide to use up to \$333,829 in fiscal 2009 Replacement Housing Factor funds if available.

OHA also has committed that any increases in its rental income resulting from the Rent Floor will be used for the self-sufficiency resource center. Because the Rent Floor is new and being phased in, OHA has not yet budgeted funding from this source.

USES OF SINGLE-FUND FLEXIBILITY		
REVENUE (SOURCES)		
Funding for 100 vouchers--otherwise restricted to voucher subsidies		\$760,000
TOTAL REVENUE		\$760,000
Self-Sufficiency Resource Center:		
Center Expenses		\$60,000
Center Staffing		
MTW Director	\$86,386	
CSS Counselor/Recruiter	\$54,915	
CSS Counselors/Hearings	\$69,190	
MTW Counselor	\$62,400	
Support Services	\$49,100	
Financial Analyst (1/3)	\$20,093	
Receptionist	\$34,000	\$376,084

Partnerships	\$116,316
MTW Evaluation	\$30,000
Day Care Center	\$60,000
Energy Conservation	\$38,300
Bus Pass Tickets	\$4,300
MTW Consultant Services	\$75,000
Section 8 Voucher (50 vouchers; \$7,600 per voucher per year)	
	\$380,000 Foreclosure Prevention, Activity 5 (up to 50 vouchers)

F. Optional - List Reserve Balances at beginning of the Plan Year

Not provided.

G. Optional - In the Plan appendix, provide sources and uses by AMP

Not provided.

TAB 8

Section VIII: Administrative

Section VIII-A: Board Resolution and Annual MTW Plan Certification of Compliance

Section VIII A: Board Resolution/Annual MTW Plan Certification of Compliance

See the Board Resolution and Annual Moving to Work Plan Certification of Compliance documents on the pages which follow.

PROPOSED RESOLUTION NO.: 3361

AUTHORIZE SUBMISSION OF THE ORLANDO HOUSING AUTHORITY'S ANNUAL MOVING TO WORK YEAR 2 PLAN TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT COVERING THE PERIOD APRIL 1, 2012 TO MARCH 31, 2013 AND THE ADOPTION AND IMPLEMENTATION OF THE PROVISIONS INCLUDED IN THIS RESOLUTION AND THE CERTIFICATION OF COMPLIANCE WITH REGULATIONS AND ATTACHMENTS

WHEREAS, the Orlando Housing Authority (OHA) has prepared the annual Moving to Work Plan (MTW) for Year 2 of the Ten (10) -Year MTW Demonstration Program,

WHEREAS, the Year 2 Moving to Work Plan will continue the initiatives of the Year 1 Plan, and

WHEREAS, the following activities for the Year-2 Moving to Work Demonstration Plan:

Moving to Work Activity 1:

Phase in implementation of a self-sufficiency rent floor (\$225) for households with non-elderly, non-disabled adults, with hardship exceptions linked to self-sufficiency activities [Approximately 50 residents from Reeves Terrace, Griffin Park and Murchison Terrace cannot meet the minimum rent floor at this time and will be referred to the Resource Center] (Statutory purposes A and B), and

Moving to Work Activity 2:

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

Moving to Work Activity 3:

Streamline the rent calculation process in the public housing and voucher programs [Modified third-party verification and disregard assets less than \$25,000]. (Statutory purpose A), and

Moving to Work Activity 4:

Consolidate inspection and recertification requirements [Conduct unified recertification and inspection process by geographic location rather than anniversary date]. (Statutory purpose A), and

Moving to Work Activity 5:

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

Moving to Work Activity 6:

Partner with Central Florida Commission on Homelessness to provide a homeless/transitional housing facility [Provide up to 50 one-bedroom units at West Oaks Provide (5 first years) for homeless individuals for up to 18 months]. (Statutory purposes B and C), and

Moving to Work Activity 7:

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

WHEREAS, the following uses of funds are proposed for Year 2:

Moving to Work Use of Funds A:

Provide a comprehensive 1-stop self-sufficiency resource center to promote use of single-fund flexibility. (Statutory purpose B), and

Moving to Work Use of Funds B:

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

Moving to Work Use of Funds C:

Provide for effective evaluation of Moving to Work initiatives (using single-fund flexibility). [Annual evaluation of the Moving to Work Activities by the University of Central Florida]. (All statutory purposes); and

WHEREAS, the Orlando Housing Authority published a notice indicating the following: (1) that a Public Hearing would be held to discuss the Plan, (2) that the Plan and all information relevant to the public hearing was available for public inspection for at least 30-days, and (3) that there would be no less than 15-days between the Public Hearing and the approval of the Moving To Work Year 2 Plan by the Board of Commissioners, and

WHEREAS, the Orlando Housing Authority's Board of Commissioners conducted the Public Hearing December 15, 2011 to discuss the Plan and invited the public to comment, and

WHEREAS, the Orlando Housing Authority's Board of Commissioners considered the public's comments before approving the Year 2 Moving to Work Plan, and

WHEREAS, the Orlando Housing Authority's Board of Commissioners approves the annual MTW Plan for Year 2 as contained in Attachment I which is incorporated into this resolution by reference, and

WHEREAS, the Board of Commissioners and the Authority adopt the Annual Moving to Work Plan Certification of Compliance, as appended hereto, and

WHEREAS, the Moving to Work Certification of Compliance is incorporated in to this resolution by reference, and

WHEREAS, the guidelines for the implementation of the Moving To Work Program will following the guidelines indicated below:

- (a) Provide that at least 75% of the families initially assisted under the Moving to Work Demonstration Program by the PHA will be very low-income families (i.e., families with incomes of less than 50% of area median income);
- (b) Implement a reasonable rent policy that is designed to encourage employment and self-sufficiency on the part of participating families;
- (c) Continue to assist substantially the same total number of low-income families under the demonstration as would have been served if United States Department of Housing and Urban Development funding sources has not been combined;
- (d) Maintain under the demonstration a comparable mix of families, by family size, as would have been assisted if United States Department of Housing and Urban Development funding sources had not been combined;
- (e) Ensure that housing assisted under the Moving to Work Program meets housing quality standards established or approved by the United States Department of Housing and Urban Development;
- (f) Comply with the reporting requirements as set forth in HUD Form 50900;
- (g) Comply with Fair Housing and Equal Opportunity Requirements as listed in 24 CFR Part 5, and the Americans with Disabilities Act of 1990;

(h) Comply with 24 CFR Part 50 or Part 58 environmental review procedures; and

(i) Comply with all for all applicable laws, regulations and program guidelines set specified in the **Annual Moving to Work Certifications of Compliance document.**

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of the Housing Authority of the City of Orlando, Florida authorize submission of the Annual Moving to Work Year 2 Plan, covering the period April 1, 2012 to March 31, 2013 to the United States Department of Housing and Urban Development, and the adoption and implementation of the provisions included in this Resolution, the Certification of Compliance with the Regulations, and the Attachments incorporated herein by reference, and further authorizes the President/CEO to execute all necessary agreements and to make changes that are not substantial.



VIVIAN BRYANT
PRESIDENT/CEO



ED CARSON
CHAIR



DATE

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 4/1/12, 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 and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment 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 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.
4. The PHA will affirmatively further fair housing by examining their 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.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. 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.
7. 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 8.
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. 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.

Attachment B

10. 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.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. 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.
14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
16. 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.).
17. 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.
18. 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.

Orlando Housing Authority FL 004
PHA Name 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)

Ed Carson Chair
Name of Authorized Official Title
Attachment B

Signature Ed Galt

Date 01/05/12

Attachment B

TAB 8

Section VIII: Administrative

Section VIII-B: Description of Any Planned or Ongoing Evaluations of the Demonstration

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

As previously stated in our response to Section VI.D, OHA is partnering with the University of Central Florida (UCF) to have UCF reviewers conduct an objective external evaluation of planned MTW activities and uses of funds.