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## **PART I – Move to Work Plan**

### **1. Vision for Homes for Good’s MTW Plan**

The three Statutory Objectives of the Moving to Work (MTW) program are to: 1) reduce cost and increase cost-effectiveness, 2) increase self-sufficiency, and 3) increase housing choice. These goals align with the following Homes for Good goals, which are outlined in our most recent [PHA Annual Plan](#): 1. Increase the number of affordable housing units; 2. Improve community quality of life and economic vitality; 3. Promote self-sufficiency and asset development of households served through public and assisted housing as well as the Section 8 homeownership program; 6. To promote a housing program that maintains quality service and integrity while providing an incentive to private property owners to rent to very low income families.

Homes for Good has a track record of delivering innovative housing programs and local preferences to our community. The MTW program will enable our organization to deepen our innovation in service to people with low-incomes because of the regulatory relief and flexibility the program offers.

Specifically, Homes for Good is interested in using MTW flexibility to create efficiencies that will benefit landlords and participants of the Housing Choice Voucher program along with the funding flexibility across the traditional Section 8 and Section 9 program.

Homes for Good isn’t concerned about challenges associated with the MTW program because of the number of federal, state, and local programs we administer and manage compliance for. Members of the Homes for Good’s leadership team and key staff members that will support the MTW Cohort #4 are as:

- Beth Ochs is the Rent Assistance Development Director who has worked for our organization for 20 years. Beth works closely with the Portland HUD Field Office in the high-performing administration of our tenant-based HCV, project-based HCV, VASH, Mainstream and FUP voucher programs. We are a region wide leader in the use of the 2-year tool for analytical administration of our voucher programs. Beth will be the lead administrator driving the implementation and operation of our MTW program.
- Wakan Alferes is the Supportive Housing Division Director who has worked for our organization for 5 years. Wakan is responsible for our self-managed Public Housing portfolio, our HUD multi-family portfolio, our ROSS program and our FSS program. Wakan previously worked for Home Forward, which is an MTW Agency.
- Natalie Dybens is the Landlord Liaison for the Rent Assistance Division. She will play an instrumental role in the implementation and operations of our MTW program in support of landlords and participants.
- Jacob Fox is the Executive Director with 25 years of experience working for 3 different PHA’s who had extensive experience in all elements of PHA administration. Jacob previously worked for Home Forward, which is an MTW agency.
- The primary staff members who will work on the MTW program will be supported by numerous other specialized members of the organization including Data Analysts, Senior Accountants and HCV Housing Specialists.



As a high performing PHA, Homes for Good completed HUD 500077 as an aspect of our current Annual Plan. As such, Homes for Good certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions. Impediments to fair housing are addressed in our current Annual Plan as follows:

The assessment of the impediments to fair housing and fair housing plan strategies, was developed with input from the City of Eugene and the City of Springfield Consolidated plan 2020.

As a first step in this effort Homes for Good conducted an assessment of the impediments and barriers to fair housing as part of its Annual PHA Plan for the Fiscal Year beginning October 1, 2015. This was developed with input during the 2015 City of Eugene and the City of Springfield Consolidated planning process and consultation with many community partners. Its effectiveness is reviewed and measured and annually so that strategies can be adjusted as necessary. Through this work it was found that the two primary issues related to housing need are 1) The lack of affordable units and 2) Significant barriers to providing equal access to units that are available.

### **Families with incomes below 30 percent of area median income (extremely low-income)**

Unless, otherwise noted, all information below is from the 2020 Eugene-Springfield Consolidated Plan. In Eugene-Springfield 44% of households in the plan area have extremely low, very low or low-moderate income. HUD provided numbers in the Consolidated plan indicated that 14.8% of total households were identified as extremely low income (less than 30% AMI) and 12.3% as low income (between 30 and 50% AMI). More households with children under age 6 (55%) and households with people over age 75 (54%) have low incomes.

The 2015 Eugene-Springfield Consolidated Plan notes that housing costs in the Eugene-Springfield area have risen sharply over the past 25 years while incomes have risen slowly, forcing many households to pay more for housing than is affordable. Households paying more than 30% of household income are considered to have a 'housing cost burden'. A majority of the renters in Eugene (54%) and Springfield (51%) are considered housing cost burdened, while approximately a third of homeowners are also cost burdened (Eugene – 32%, Springfield – 33%). The elderly makes up 15% of the very low income with a housing cost burden.

Low and very low-income people need increased access to quality affordable rental housing. There is a total of 31,055 low-income renter households in Eugene, and 7,335 in Springfield.

A significant majority of low-income renters experience a housing cost burden, overcrowding, and/or substandard housing conditions (Eugene – 78%, Springfield – 76%).

A significant majority of low-income renters spend more than 30% of their income on housing costs (Eugene – 76%, Springfield – 74%).

A large percentage of low-income renters spend more than 50% of their income on housing costs (Eugene – 51%, Springfield – 34%).



### **Elderly families and families with disabilities**

Elderly make up 13.9% (Renter) and 33.7% (Owner) of the total households with a severe housing cost burden by income. A severe housing cost burden indicates that over 50% of the income is spent on housing.

The Consolidated Plan also indicates that about 14% of population in the Cities of Eugene and Springfield lives with one or more disabilities (29,125 people). Persons with disabilities face a number of barriers related to mobility, transportation, housing, employment, and access to services. In addition, persons with disabilities report many instances of discrimination.

### **Households of various races and ethnic groups residing in the jurisdiction**

In most income categories, there are racial or ethnic groups which are experiencing a disproportionately greater need than the needs of the income category as a whole. For people with very low incomes (30-50% MFI), American Indian/Alaskan Native and Black/African Americans experience a disproportionately greater need than the general population. For people with low incomes (50-80% MFI), Black/African Americans experience a disproportionate level of need. For people with moderate income (80%-100 MFI), Asian, Latino, and Black/African American experience a disproportionately greater need than the income category as a whole. In Eugene and Springfield, there are approximately 13% of the people who identified as a minority race in the 2010 census. There are five census tracts where a higher percentage (17%- 23%) of people identified as a minority race.

Hispanic households experience a disproportionately greater incidence of housing cost burden compared to the entire population, with 53% of the Hispanic households paying more than 30% of their income for housing costs. Asian households experience a disproportionately greater incidence of severe housing cost burdens compared to the entire population; 35% of Asian households spend more than 50% of their income on housing costs.

Black/African American households experience a disproportionately greater need with severe housing problems in both very low-income (30-50% AMI) and moderate income (80-100% AMI) categories. Severe housing problem exist when a household experiences one or more of the following housing problems: lacks complete kitchen facilities, lacks complete plumbing facilities, has over 1.5 people per room, and a housing cost burden over 50%. Both Asian and Hispanic low-income (50-80% AMI) households experience a disproportionate number of severe housing problems.

### **Affordability and supply**

The lack of availability rental and owner-occupied units for low-income residents, as indicated by the significant waiting lists for public housing, and the difficulty experienced by Section 8 voucher-holders in trying to find affordable available housing. Additionally, vacancy rates remain low, at 2% for Eugene owner-occupied and rental housing, and 2% in Springfield for owner-occupied housing and 3% for renter units. Data from Oregon Housing and Community Services further supports this need indicating there is a deficit of over 2,700 affordable housing units in Lane County in 2016.

Our strategies to increase the availability of affordable, accessible housing include aggressively pursuing additions to the housing supply through the use of government subsidies and incentives as well as public/private partnerships.

Homes for Good is addressing this need in a variety of ways which include:

- New Construction



- Administrative
- Preservation
- Development Pipeline

## **2. Plan for Future Community/Resident Engagement**

Homes for Good is dedicated to the belief that resident and community engagement is a pillar to an effective, successful, and inclusive housing program(s). Homes for Good has robust engagement with residents and the community including but not limited to:

Two appointed commissioners on our agency's board who are also residents of Public Housing.

An active Resident Advisory Board comprised of residents of public housing and participants of our tenant-based housing programs.

Homes for Good has an Equity Strategic Team which is developing an Equity Strategic Plan that centers resident engagement and will be a future tool to connecting with residents, program participants as well as our existing and future partners.

Homes for Good staff actively participate in the NAACP housing committee. Part of our Strategic Equity Plan includes building relationships with local BIPOC Community and create more outreach with our BIPOC Community.

A multitude of local preferences across tenant and project-based housing programs that provide access to persons with high housing barriers such as disability status, homelessness (including homeless youth) and survivors of domestic violence. Most recently Homes for Good begun partnering with local school districts on preferences for families experiencing homelessness.

Community training and dedicated phone lines during waitlist openings. Trainings and dedicated phone lines ensure ease of access to our programs and an understanding of the waitlist application process for potential applicants, advocates, and local partner agencies.

Homes for Good has a contractual relationship with Language Line Solutions. Language Line Solutions provides on demand translation in over 240 languages. This service is utilized by Homes for Good staff, allowing them to converse with limited English proficiency persons. Language Line Solutions also provides written translation services to Homes for Good.

Homes for Good also communicates across an array of platforms through its Communication Team. Platforms include an agency website, Facebook, Instagram and Twitter as well as public email communications through Mailchimp.

## **3. PHA Operating and Inventory Information**



Homes for Good is Oregon's second largest Public Housing Agency. Homes for Good has over 3,000 tenant and project-based housing vouchers. These vouchers include VASH, Mainstream, Foster Youth Initiative Vouchers and Emergency Housing Vouchers. Homes for Good also has over 800 Public and Assisted Housing units.

Homes for Good serves a variety of high barrier populations within its housing programs. Homes for Good has 15 community partner agencies with active Memorandums of Understanding that establish local preference for tenant and project-based housing programs. These partners provide case management and related services to persons who may be experiencing mental health issues, homelessness, domestic violence abuse or are returning to the community from incarceration.

Homes for Good maintains a high utilization rate for all its housing stock. Utilization for tenant-based vouchers is in the upper 80<sup>th</sup> percentile. Overall leasing rates for the calendar year are in the 90<sup>th</sup> percentile. Through local preferences and permanent supportive housing programs we serve persons experiencing an array of barriers. Strategic partnerships with community and local government agencies allows for a collaborative wrap around service approach for seeking and sustaining housing. An MTW status would allow us to expand such partnerships.

While Homes for Good does not intend to make any major changes to its housing stock as a result of an MTW status we do intend to keep expanding on the excellent and innovative work we have been doing. This work serves people with low incomes from our community.

A few examples include:

1. Local Preference partnership with Sponsors that provides preference to tenant based and project-based housing. Founded in 1973, Sponsors provides assistance, housing and case management to persons exiting the Oregon State Correctional Institution. Sponsors helps over 500 persons per year re-enter the community, some of which receive housing assistance from Homes for Good.
2. Following devastating wildfires Homes for Good partnered with Lane County through the Turnkey Project to operate a 50-room former hotel to help house people affected by the wildfires. The Bridges on Broadway was one of the first Turnkey project to begin operations in Oregon and provide survivors with a place to call home. Project funded through Oregon Community Foundation and OHCS. The long-term plan for Bridges on Broadway is permanent supportive housing for people experiencing homelessness.
3. Homes for Good was also able to create preferences for Sarang and Hayden Bridge Landing for wildfire survivors and again partnered with Lane County to connect people displaced as a result of the 2020 Holiday Farm Fire.
4. Homes for Good partnered with Oregon Housing and Community Development (OHCD: Oregon's Housing Finance Commission) by utilizing direct homeless referrals through HUD's Continuum of Care program and receiving Barrier Buster funds from OHCD for mainstream voucher in our jurisdiction.
5. The Commons on MLK. A 51-unit permanent supportive housing project developed by Homes for Good in partnership with Lane County. Using a housing first harm reduction model these 51 project-based voucher units provide 24/7 on site support services, case management and connections to mainstream resources, health care, substance abuse treatment programs and peer resources. The overall estimated





cost for the project was \$13million. With land provided by Lane County and a commitment of \$3million from the State of Oregon in addition to other sources of funding Homes for Good was able to bring this project to the community.

6. The Keystone a 15 unit development providing Permanent Supportive Housing to chronically homeless families in Eugene, Oregon. Homes for Good and Lane County led the effort to develop and build the project. This partnership will identify, engage, house and support families with children from Lane County's Central Wait List. The Central Wait List is a prioritized by-name list of households needing housing, ranked by those most in need based on various criteria. Lane County currently prioritizes chronically homeless households for all Permanent Supportive Housing. The overall estimated cost for the project is \$4 million. Land for the project is currently owned by Lane County, for use by the fairgrounds, and ownership will be transferred to Homes for Good. The Keystone was a result of a Permanent Supportive Housing Cohort and a special funding award through Oregon Housing and Community Services (OHCS).
7. The Nel. A 45-unit permanent supportive housing project developed by Homes for Good in partnership with Lane County. The 45-project based voucher studio units will serve persons experiencing chronic homelessness. Onsite supportive housing and case management will be provided. Funding for this project includes: 9% tax credit equity (U.S. Bank), Oregon Housing and Community Services grant, City of Eugene HOME and System Development Charge waivers, Pacific Health Associates grant, EWEB SDC exemption and energy incentives, and commercial permanent loan (U.S. Bank)

#### ***(4) Plan for Local MTW Program***

Homes for Good already has a strong commitment and track record for bringing collaborative and innovative projects to our community. With an MTW status, we would utilize MTW flexibility to align the needs of the community and residents with the three (3) MTW statutory objectives in ways that help transform operations, encourage self-sufficiency, and better utilize the funding it receives.

**Cost Effectiveness:** Homes for Good is dedicated to exploring MTW flexibility options such as implementing triennial reviews and eliminating deductions and/or modifying the HQS inspection schedule. These options would allow Homes for Good to redirect staff time and resources toward activities that have a higher value for the participant and the community.

**Self-Sufficiency:** Homes for Good envisions our agency having the ability to provide automatic enrollment into our Self-Sufficiency Program upon participant entry. This would be a dramatic increase in participation. A MTW status and the flexibility of Section 8 and Section 9 funds that results from that status would provide a pathway for our vision to become a reality.

**Housing Choice:** Homes for Good is dedicated to exploring mortgage assistance and expanded homeownership programs. We believe homeownership is a key element in ending generational poverty. We are also interested in exploring expansion of our project-based vouchers.



## ***(5) Proposed Use of MTW Funds***

As part of this MTW application package, Homes for Good requests authorization to use Public Housing and Housing Choice Voucher HAP and Admin funds flexibly. Homes for Good plans to use funds flexibly across the Section 8 and Section 9 programs. While no plans currently exist to do to so, Homes for Good may use its MTW funds to purchase, rehabilitate, or develop affordable housing.

## ***(6) Evidence of Significant Partnerships***

Homes for Good leverages partnerships with others in the community for housing development, client services, and program support. The word partnerships is in our tagline: Homes, People, Partnerships, Good. We partner with anyone in our community who shares our vision for providing housing and expanding the housing programs offered in Lane County.

Homes for Good partners closely with Lane County Government who see housing opportunity as one of their key strategic priorities. This significant partnership is a result of many project and initiatives our agencies have worked on in the last 5 years.

A major partnership project previously mentioned is The Nel. This 45-unit permanent supportive housing project was a collaborative funding effort by U.S. Bank, Oregon Housing and Community Services grant, City of Eugene HOME and System Development Charge waivers, Pacific Health Associates grant, EWEB SDC exemption and energy incentives, and commercial permanent loan (U.S. Bank). Collaboration and partnerships will continue as the project begins to serve clients. Referrals for the units will be vetted by our community's Continuum of Care and referred from the Centralized Wait List. Laurel Hill Center will serve as the project's onsite supportive service provider. Laurel Hill is a local non-profit agency providing services to persons with disabilities for over 45 years.

Homes for Good also has a significant partnership with our community's Rental Owner's Association.

Lane County's Rental Owner's Association (ROA) is the largest in Oregon. Our Rent Assistance Division Director serves on the ROA's board and our Landlord Liaison attend monthly membership meetings and facilitates routine educational workshops for the association. Topics such as how to prepare a unit for a Housing Quality Standards Inspection and how to complete a Request for Tenancy Approval are offered.

These partnerships are just a sampling of what Homes for Good engages in to provide innovative and effective housing programs and resources.

Our vision is to support high barrier populations and create pathways to more independent housing resources while providing opportunities for clients to improve their self sufficiency along the way. This allows those we serve to move towards self sufficiency while at the same time providing space for other high barrier applicants to access our programs.





For example, a participant of The Nel enters housing with a chronically homeless designation. With the onsite support services offered by Laurel Hill and stable housing in place our participant can access resources and barriers are reduced. As barriers are reduced our participant may choose to move from The Nel and access a Section 8 voucher through Choice Mobility. When the Section 8 voucher is received our participant is automatically enrolled in our now expanded Family Self Sufficiency Program. Our participant can locate a privately owned rental unit due in part to our robust relationship with the landlord community via the ROA. As the participant continues, they may grow from the private rental market to having a desire to purchase a home. Homes for Good is able to assist with its expansion of homeownership resources. The flexibility of MTW status would allow Homes for Good the ability to expand Family Self Sufficiency participation, explore homeownership expansion and in turn better serve our clients and community.

With an MTW status Homes for Good intends to leverage local non-profit agencies in the community to provide resources and support for our clients as they move along the path of self-sufficiency. Agencies such as our local welfare and workforce offices.

## Landlord Incentive Activities Information

### (1) Landlord Needs Assessment

Homes for Good (OR006) is located in Lane County, Oregon. The Housing Choice Voucher Program contains 3,198 vouchers and the program’s jurisdiction is Lane County. Lane County contains a mix of metro and rural communities. The city of Eugene is the largest metro area with a population of 168,302, the county extends out to the coast to the town of Florence with a population of 8,921 and in the opposite direction into the mountains to the town of Oakridge with a population of 3,303<sup>1</sup>. As of April 2021, Homes for Good has active HAP contracts with 673 landlords. The demographics of the landlords under HAP contract include

Range of Tenants	Landlord Count
1 Tenant	430
2-9 Tenants	175
10-19 Tenants	39
20-29 Tenants	11
30-39 Tenants	7
40-49 Tenants	3
50-59 Tenants	2
60+ Tenants	6
	673

<sup>1</sup> United States Census Bureau



The jurisdiction has a renter vacancy rate of 3.5%. Overall, the jurisdiction lacks housing stock of affordable units<sup>2</sup>.

Renter Affordability	< 30% MFI	< 50% MFI	< 80% MFI
Renter Households	14,340	24,620	36,415
Affordable Units	4,605	9,880	38,525
Surplus / (Deficit)	(9,735)	(14,740)	2,110
Affordable & Available*	2,215	7,025	26,945
Surplus / (Deficit)	(12,125)	(17,595)	(9,470)

\*Number of affordable units either vacant or occupied by person(s) in income group.

Owner Affordability	... for MFI	.. for 80% MFI	.. for 50% MFI
Max Affordable Value	\$225,615	\$180,492	\$112,807
% of Stock Affordable	52.6%	36.7%	15.4%

The jurisdiction contains the largest Rental Owner’s Association in the state of Oregon. As of February 2021, the Rental Owner’s Association had 1,242 members representing 18,617 units of rental property<sup>3</sup>.

**TOTAL ROA MEMBERSHIP UNIT OVERVIEW:**

- 931 Members have 0-6 Units = 2256 Units
- 174 Members have 7-24 Units = 2312 Units
- 35 Members have 25-60 Units = 1364 Units
- 12 Members have 61-99 Units = 941 Units
- 28 Members have 100+ Units = 10,927 Units
- 62 Industry Associate Members = 817 Units
- 1242 TOTAL - ROA Membership Units: 18,617 Units**

The Rental Owner’s Association has monthly membership meetings, monthly board meetings, provides monthly educational workshops and distributes a monthly newsletter to all members.

Within the state of Oregon, source of income is a protected class. The law went into effect July 1, 2014. As a protected class, landlords cannot simply say, “No Section 8” within their application process as they could before July of 2014. However, Homes for Good continues to receive communications from landlords and tenants inquiring whether it is within a landlord’s right to state “no section 8” within their application process.

<sup>2</sup> Oregon Housing and Community Services – Lane County Demographic and Housing Profiles

<sup>3</sup> Lane County Rental Owner’s Association – Monthly Activity Report



During CY2020 Homes for Good had 29 Request for Tenancy Approvals fall thru out of 366 submitted. Reason for fall thru included

Reason RTA fell thru	# of Vouchers
T Withdrew RTA	10
Rent too high	10
LL Withdrew RTA	7
Failed HQS	1
Rent Reas Failed	1
<b>Grand Total</b>	<b>29</b>

The Housing Choice Program has several areas of strength.

Source of income being a protected class within the jurisdiction provides better access to housing stock than what the community had prior to the 2014 change in law.

The Program has a full time Landlord Liaison. The Liaison provides routine education to community landlords and local preference partners. The Liaison has a dedicated phone line and e-mail to address landlord questions or concerns. In CY20 the Liaison received 2,279 communications from the landlord community.

The Program has a strong connection to the Rental Owner’s Association. The Landlord Liaison attends all monthly membership meetings, contributes to the monthly newsletter, and facilitates educational workshops on subjects such as Housing Quality Standards and completing Request for Tenancy Approvals. The Division Director for the Housing Choice Voucher Program is a member of the Rental Association Board and attends the monthly board meetings.

The Program has a strong connection to local community partners who serve as local preference partners within the Program. Partners can refer directly into the Program for a Housing Choice Voucher. Partners serve high barrier populations such as domestic violence survivors and homeless persons. Partners provide support to tenants during housing search and after lease-up to maintain housing stability. The Program has fourteen partners.

The Program maintains a high utilization rate of 99%. Attrition is at 6.7%.

The Housing Choice Voucher Program has a key area of weakness. In 2019 the Program completed a survey of its landlords. Results showed quicker turnaround times in processing Request for Tenancy Approvals was desired. This aligns with the National Listening Session for Landlords that HUD conducted in 2018 showing improvement in the Housing Quality Standards process was desired<sup>4</sup>. This area of weakness would be addressed and reduced with the implementation of MTW #4 cohort activities. Specific activities are discussed below.

<sup>4</sup> U.S. Department of Housing and Urban Development HCV Landlord Listening Forums and Focus Groups



## ***(2) MTW Cohort #4 Activities***

As a member of the Move to Work Cohort #4, Homes for Good would implement Pre-Qualifying Unit Inspections and Alternate Inspection Schedule as its two activities from the options provided in the Move to Work Activities list.

The ability to implement an alternative schedule for conducting Housing Quality Standard inspections would provide bandwidth within the Inspection Staff to conduct pre-inspections for units that may house a Housing Choice Voucher tenant. The Inspection staff includes three full time inspectors certified in Housing Quality Standards. The increased bandwidth would result in Inspectors being able to complete Housing Quality Standard inspections within 1-2 business days of the landlord contacting Homes for Good.

In addition to the Landlord Liaison, Homes for Good also has a full time Housing Liaison on staff. The Housing Liaison fields calls from applicants and tenants who are searching for housing or have concerns/questions regarding housing.

With both a Landlord Liaison and Housing Liaison on staff Homes for Good is confident Housing Quality Standard concerns and/or questions that may arise between inspections would be addressed through special inspections as needed, as both tenants and landlords have dedicated communication channels to voice concerns.

The ability to pre-inspect units would result in Request for Tenancy Approvals be processed faster. The speed in which Request for Tenancy Approvals are processed being a concern at both the national and jurisdictional level, would be improved upon with the implementation of the aforementioned move to work activities.



## PART II

### **(No page limit or page numbers necessary for Appendices 1-3. Appendix 4 contains no more than 10 pages and includes page numbers).**

- Appendix 1: Moving to Work Certifications of Compliance and Commitment to Participate in the Fourth Cohort Evaluation – these must be signed and submitted as described in *Section 5(C)(iii)(a)* and Attachments I and II of this Notice

*The PHA must provide a certification that the MTW Plan and application package is consistent with the "Moving to Work Certifications of Compliance." A certification sheet for this purpose is provided in Attachment I of this Notice. The PHA must also provide a "Commitment to Participate in the Fourth Cohort Evaluation." A certification sheet for this purpose is provided in Attachment II of this Notice. These should be completed and executed by the PHA according to the provided instructions and submitted with the MTW Plan and application package*

- Appendix 2: Public Process Documentation – this must be completed and submitted as described in *Sections 5(C)(i)(c)* and *5(C)(iii)(b)* of this Notice.

*The PHA must provide documentation that the elements of the public process described in Section 5(C)(i)(c) of this Notice were met. There is no prescribed format or page limit for this appendix, but materials must include:*

*Evidence that public housing residents and HCV participants (as applicable to the PHA's inventory) were notified of the PHA's intention to participate in the MTW Demonstration program;*

*Evidence that two resident meetings (separate from the public hearing) were held;*

*The public notice advertising the public hearing;*

*Evidence that the public hearing was held (items could include minutes, sign-in sheet, etc.); and*

*A resolution signed by the Board of Commissioners (or equivalent governing body) adopting the MTW Plan and application package and the certifications contained therein. This resolution must contain: confirmation of the PHA's desire to obtain MTW designation under the fourth cohort of the MTW Expansion; a statement of the intention to comply with the MTW objectives, the MTW statutory requirements and the MTW Operations Notice; confirmation that the PHA met the public process requirements in Section 5(C)(i)(c) of this Notice; and a statement of the commitment to implement the landlord incentive activities proposed in the MTW Plan and application package.*



- Appendix 3: Required Standard Forms – this must include the completed forms described in Section 5(C)(iii)(c) of this Notice.

*The PHA must provide completed versions of the:*

*Certification of Consistency with the Consolidated Plan (form HUD-2991);*

*Certification of Payments (form HUD-50071); and*

*Disclosure of Lobbying Activities (SF-LLL) if applicable.*

*Blank copies of these Standard Forms may be accessed on the fourth cohort website at: [www.hud.gov/mtw](http://www.hud.gov/mtw).*

### **List of Completeness Requirements**

HUD will verify the following completeness requirements from the MTW Plan and application package as submitted by the deadline in Section 5(E) of this Notice:

- (1) The PHA submitted an MTW Plan and application package consisting of the MTW Plan, Landlord Incentive Activities Information, and applicable appendices;
- (2) The PHA submitted a Board Resolution signed by the Board of Commissioners (or equivalent governing body) that: approves the PHA's desire to obtain MTW designation under the fourth cohort of the MTW Expansion; states the intention to comply with the MTW objectives, MTW statutory requirements and the MTW Operations Notice; confirms that the PHA met the public process requirements in *Section 5(C)(i)(c)* of this Notice; and states the commitment to implement the landlord incentive activities discussed in the MTW Plan and application package; and
- (3) The PHA met the public process requirements explained in *Section 5(C)(i)(c)* of this Notice.

#### *Public Process Requirements*

*The fourth cohort MTW Plan and application package must undergo a public process period, elements of which include all of the following:*

*The PHA must notify public housing residents and/or HCV participants (as applicable to the PHA's inventory) of its intention to participate in the MTW Demonstration Program. This notification must be in advance of developing the MTW Plan (as described in *Section 5(C)(ii)(a)* of this Notice).*

*The PHA must hold at least two resident/participant meetings (separate from, and before, the required public hearing).*

*After the two resident/participant meetings, the PHA must publish a notice that a hearing will be held on the full MTW Plan and application package. The draft MTW Plan and Landlord Incentive Activities Information must be available for public inspection for at least 30 days before submission of the MTW Plan and application package to HUD.*





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Homes. People. Partnerships. Good. [www.homesforgood.org](http://www.homesforgood.org)

# APPENDIX 1

**ATTACHMENT I**  
**Moving to Work Certifications of Compliance**

**CERTIFICATIONS OF COMPLIANCE**

***U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT***  
***OFFICE OF PUBLIC AND INDIAN HOUSING***

**Certifications of Compliance with HUD and Federal Requirements and Regulations:  
Board Resolution to Accompany Application to the Moving to Work Demonstration Program**

Acting on behalf of the Board of Commissioners of the applicant 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 application to the Moving to Work (MTW) Demonstration Program for the PHA and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the application and implementation thereof:

- (1) The PHA will adhere to the MTW Operations Notice or successor notice and all requirements therein.
- (2) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure at least 75% of families assisted are very low-income as defined in Section 3(b)(2) of the 1937 Act throughout the PHA's participation in the MTW Demonstration Program.
- (3) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in establishing a reasonable rent policy that is designed to encourage employment and self-sufficiency.
- (4) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to assist substantially the same total number of eligible low-income families as would have been served absent MTW throughout the PHA's participation in the MTW Demonstration Program.
- (5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program throughout the PHA's participation in the MTW Demonstration Program.
- (6) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.
- (7) The PHA published a notice that a hearing would be held, that the application 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 application by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the application and invited public comment.

- (8) The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the application by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the application.
- (9) The PHA certifies that the Board of Commissioners 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 (or successor form as required by HUD).
- (10) The PHA certifies that it will carry out its application in conformity with: Title VI of the Civil Rights Act of 1964 (42 USC 2000d-2000d-4); the Fair Housing Act (42 USC 3601-19): Section 504 of the Rehabilitation Act of 1973 (29 USC 794); Title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.); all regulations implementing these authorities; other applicable Federal, State, and local civil rights laws; and that it will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)).
- (11) The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2) and will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (12) The application is consistent with the applicable Comprehensive Plan (or any plan incorporating such provisions of the Comprehensive Plan) for the jurisdiction in which the PHA is located.
- (13) The application certifies that according to the appropriate State or local officials that the application is consistent with the applicable Consolidated Plan.
- (14) The PHA complies with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (15) The PHA complies with the Violence Against Women Act and its implementing regulations at 24 C.F.R. Part 5, Subpart L and Parts 960 and 966.
- (16) The PHA complies with the Architectural Barriers Act of 1968 and its implementing regulations at 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (17) The PHA complies 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 75.
- (18) The PHA complies with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (19) The PHA complies 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.

- (20) The PHA complies 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.
- (21) The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (22) 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.
- (23) 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.
- (24) The PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (25) The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (26) The PHA will comply with the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards at 2 CFR Part 200.
- (27) The application and all attachments are available 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.

\_\_\_\_\_  
**PHA NAME**

\_\_\_\_\_  
**PHA NUMBER/HA CODE**

*I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, or submitting a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.*

\_\_\_\_\_  
**NAME OF AUTHORIZED OFFICIAL\***

\_\_\_\_\_  
**TITLE**

\_\_\_\_\_  
**SIGNATURE**

\_\_\_\_\_  
**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.*

**ATTACHMENT II**  
**Commitment to Participate in the HUD-Sponsored Evaluation of the Fourth Cohort of the MTW Expansion**

**COMMITMENT TO PARTICIPATE**

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
**OFFICE OF PUBLIC AND INDIAN HOUSING**

**Commitment to Participate in the HUD-Sponsored Evaluation of the Fourth Cohort of the MTW Expansion**

In addition to the elements described in PIH Notice 2021-03, HUD will provide additional scope and information about the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion and any additional requirements that the PHA must adhere to.

Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I agree to ensure participation of the PHA in the HUD-sponsored evaluation of the first cohort of the MTW Expansion as described in PIH Notice 2021-03 understanding the following considerations:

- (1) The PHA must participate in the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion whether or not it receives an MTW designation through the lottery process described in PIH Notice 2021-03.
- (2) The PHA must follow PIH Notice 2011-65 or its successor notice whether or not it receives an MTW designation through the lottery process described in PIH Notice 2021-03. Adherence to PIH Notice 2011-65 regarding "Timely Reporting Requirements of the Family Report (form HUD-50058 and form HUD- 50058 MTW) into the Public and Indian Housing Information Center" is important to HUD's ability to evaluate the fourth cohort of the MTW Expansion.
- (3) In event the PHA is not selected to be in the treatment group, the PHA may apply to future cohorts of the MTW Expansion to which the PHA is eligible. Despite a potential designation under a future cohort, the PHA may continue to have obligations under the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion as well. Despite a potential designation under a future cohort, the PHA may not implement MTW activities in the Cohort #4 MTW Activities List in PIH Notice 2021-03 for the duration of the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion.
- (4) The PHA will cooperate fully with HUD and its contractors for the duration of the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion. Failure to comply with the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion may affect the PHA's ability to apply to future cohorts of the MTW Expansion.

\_\_\_\_\_  
**PHA NAME**

\_\_\_\_\_  
**PHA NUMBER/HA CODE**

*I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, or submitting a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.*

\_\_\_\_\_  
**NAME OF AUTHORIZED OFFICIAL\***

\_\_\_\_\_  
**TITLE**

**SIGNATURE**

**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.*





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## APPENDIX 2

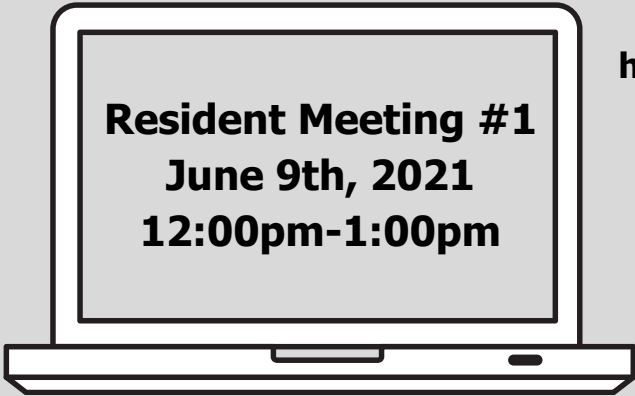


# Join us for Resident Meetings about Homes for Good's "Moving to Work" Cohort 4 Application

## What is "Moving to Work" ?

Started in 1996, Moving to Work (MTW) is a 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. MTW status would allow Homes for Good exemptions from many existing public housing and voucher rules and provides funding flexibility with how we could use our Federal funds.

**Join us for a presentation on "Moving to Work" and an opportunity for questions.**



**Resident Meeting #1  
June 9th, 2021  
12:00pm-1:00pm**

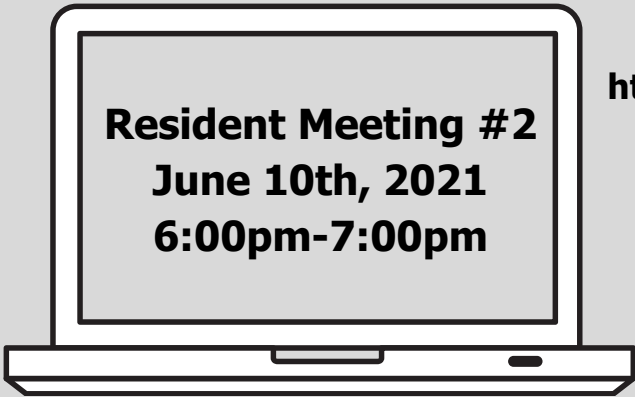
<https://us02web.zoom.us/j/8144265095>

**Meeting ID: 814 4265 0951**

**Dial by your location**

**+1 253 215 8782 US (Tacoma)**

**+1 346 248 7799 US (Houston)**



**Resident Meeting #2  
June 10th, 2021  
6:00pm-7:00pm**

<https://us02web.zoom.us/j/87255370305>

**Meeting ID: 872 5537 0305**

**Dial by your location**

**+1 253 215 8782 US (Tacoma)**

**+1 346 248 7799 US (Houston).**



Find a participant

- |           |                                   |  |  |  |  |
|-----------|-----------------------------------|--|--|--|--|
| <b>JS</b> | Jordyn Shaw (Host, me)            |  |  |  |  |
| <b>EK</b> | Ela Kubok (she/her)               |  |  |  |  |
| <b>W</b>  | Wendy                             |  |  |  |  |
| <b>B</b>  | BBertrand                         |  |  |  |  |
| <b>BO</b> | Beth Ochs - Homes for Good        |  |  |  |  |
| <b>EY</b> | Emily Yates (she/her)             |  |  |  |  |
| <b>JF</b> | Jacob Fox (he/him) Homes for Good |  |  |  |  |
| <b>W</b>  | wiredwuullff                      |  |  |  |  |

Participants (5)



Jordyn Shaw (Host, me)



Beth Ochs - Homes for Good



Jacob Fox (he/him) Homes for Good



Michelle Thurston



Ela Kubok (she/her) Homes for Good



Invite

Mute All

Pg 24





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Link to recording of Resident Meeting: <https://vimeo.com/567704958>



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# TO BE INSERTED PROOF OF PUBLIC HEARING ADVERTISEMENT





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# TO BE INSERTED PROOF OF PUBLIC HEARING



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Homes. People. Partnerships. Good. [www.homesforgood.org](http://www.homesforgood.org)

# **TO BE INSERTED: SIGNED BOARD RESOLUTION**



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## APPENDIX 3

# Certification of Consistency with the Consolidated Plan

U.S. Department of Housing  
and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.  
(Type or clearly print the following information:)

Applicant Name: \_\_\_\_\_

Project Name: \_\_\_\_\_

Location of the Project: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Name of the Federal  
Program to which the  
applicant is applying: \_\_\_\_\_

Name of  
Certifying Jurisdiction: \_\_\_\_\_

Certifying Official  
of the Jurisdiction  
Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

# DISCLOSURE OF LOBBYING ACTIVITIES

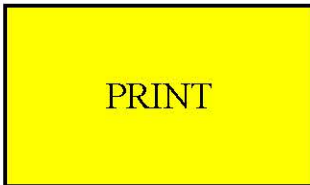
Approved by OMB

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

0348-0046

(See reverse for public burden disclosure.)

<b>1. Type of Federal Action:</b> <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. Report Type:</b> <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____
<b>4. Name and Address of Reporting Entity:</b> <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Congressional District, if known: 4c	<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>  Congressional District, if known:	
<b>6. Federal Department/Agency:</b>	<b>7. Federal Program Name/Description:</b>  CFDA Number, if applicable: _____	
<b>8. Federal Action Number, if known:</b>	<b>9. Award Amount, if known:</b> \$ _____	
<b>10. a. Name and Address of Lobbying Registrant</b> <i>(if individual, last name, first name, MI):</i>	<b>b. Individuals Performing Services</b> <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i>	
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature: _____ Print Name: _____ Title: _____ Telephone No.: _____ Date: _____	
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)



## INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.  
  
(b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).
11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.

# Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Applicant Name

OR006 Homes for Good

Program/Activity Receiving Federal Grant Funding

Move to Work Cohort #4

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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)

Name of Authorized Official

Jacob Fox

Title

Executive Director

Signature

Date (mm/dd/yyyy)