

**PHA Name:**

Housing Authority of the City of Sanford, FL

**PHA Code:**

FL-016

**MTW Supplement for PHA Fiscal Year Beginning:**

07/1/2024

**PHA Program Type:**

Public Housing

**MTW Cohort Number:**

Asset Building

**MTW Supplement Submission Type:**

Annual Submission

## **B. MTW Supplement Narrative.**

As part of MTW Cohort #5, Sanford Housing Authority is participating in the Asset Building, which will provide Savings, Financial Literacy, and Self-Sufficiency Support. SHA plans to expand on the Self-Sufficiency strategies proposed in its July 2024 MTW Supplement:

1. As part of the Asset Building Initiative, SHA will contribute from \$10 up to \$50 per month per household, matching to SHA public housing residents and selected Orlando Housing Authority Housing Choice Voucher holder family savings accounts in Seminole County. This is the only initiative that SHA is proposing for 2025.
2. As part of the Asset Building Initiative and drawing on OHA's experience, SHA may set requirements for participation in the Sanford Housing Authority Resource Center (SHARC) that will provide support to public housing families. This could be in partnership with OHA's existing MTW Resource Center.
3. SHA may provide additional family support from community resources identified in the Choice Neighborhoods Initiatives (CNI) Transformation Plan. SHA may seek approval to provide the SHARC and supportive service resources to other low-income Sanford residents in addition to public housing residents, including former SHA public housing residents who now are OHA voucher-holders, households assisted by only Tax Credits in developments also containing public housing and other OHA voucher-holders in Seminole County.

SHA envisions self-sufficiency activities that build on both HUD's suggested Opt-Out Savings Account asset-building option and OHA's successful implementation of its MTW Resource Center experience. SHA's public housing program is in the development phase and, therefore, will emphasize housing choice through activities that streamline the development of public housing and use the funding to increase the supply of other affordable units in Sanford. The SHA's CNI-developed plans also include a homeownership component, which SHA may be able to support with MTW financial and regulatory flexibility.

SHA will consider additional MTW activities, such as stepped rents and less frequent than annual income recertifications, which would provide additional incentives for SHA residents to increase their incomes and thus be able to build assets. SHA will collaborate with the Seminole County Community Services Division and other social services support providers to further meet the needs of the MTW program clients. The primary goal of this program is to help families increase their incomes and thus be able to have and increase the value of savings accounts and build other assets. Based on the experience of OHA's MTW Resource Center, SHA expects households to benefit beyond SHA's financial contributions to these accounts. The elements that require MTW regulatory or funding flexibility may include the use of MTW funds for contributions to the household savings accounts, required participation of households in SHARC activities, and potential programmatic changes such as variations in income recertification timing and procedures and variations in rent rules. The expenditure of public housing funds to provide supportive services for public housing households will not require MTW flexibility.

C. The policies that the MTW agency is using or has used (currently implemented, plan to implement in the submission year, plan to discontinue previously discontinued)

<b>1. Tenant Rent Policies</b>	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payments as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payments as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (PH)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden t(HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deductions (s) (PH)	Not Currently Implemented
s. Elimination of Deduction (s) (HCV)	Not Currently Implemented
t. Standard Deductions (HCV)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards-Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness- Process (HCV)	Not Currently Implemented
d. Rent Reasonableness-Third-Party Requirement (HCV)	Not Currently Implemented
<b>3. Reexaminations</b>	
a. Alternative Reexamination Scheduled for Households (PH)	Not Currently Implemented
b. Self-Certification of Assets (PH)	Not Currently Implemented
c. Self-Certification of Assets (HCV)	Not Currently Implemented
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV-Tenant-based Assistance (HCV)	Not Currently Implemented
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlord (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
<b>6. Housing Quality Standards (HQS)</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term-Limited Assistance (HCV)	Not Currently Implemented

<b>7. Term-Limited Assistance</b>	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH&amp;HCV)</b>	
a. Increase Elderly Age (PH &HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Program Cap (PH)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA -owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a. PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
b. HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
c. PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
d. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
e. PH Alternative Family Selection Procedure (PH)	Not Currently Implemented
f. HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
g. PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
h. HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
i. PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
j. HCV Policies for Addressing Increases in Family Income (HCVH)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a. PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
b. HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
c. PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
d. HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b. PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
c. HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
d. PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
e. HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
Deconcentration of Poverty in Public Housing Policy	Not Currently Implemented
<b>17. Local, Non-traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Planning to Implement in Submission Year

**C. MTW Activities Plan that SHA Plans to Implement in the Submission Year or Is Currently Implementing**

<b>17.b.-Service Provision</b>
The primary goal of this program is to help families increase their incomes and thus be able to have and increase the value of savings accounts and build other assets. The Sanford Housing Authority will invite a limited number of SHA Public Housing residents and randomly selected OHA Housing Choice Voucher holder residents in Seminole County to volunteer to participate in the Financial Literacy Self-Sufficiency Program for up to two years.
Head of Household Program participants will deposit a minimum of \$10 up to \$50 monthly into the partnering financial institution or a type of FSS Escrow Account. Each participating head of household's account will receive a monthly cash deposit match from the SHA. Program participants will be required to attend financial literacy and credit building workshops quarterly.
PHA provided services to 0 households in the most recently completed PHA Fiscal Year through this activity.
The MTW activity applies to all units/properties,
No affected families are receiving Services only.

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<b>Safe Harbor Waivers seeking HUD Approval:</b> No Safe Harbor Waivers are being requested.
<b>E.</b>	<b>Agency-Specific Waivers.</b>
<b>E.1</b>	N/A
<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b> MTW Agency does not have approved Agency-Specific Waivers

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	N/A

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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**G. MTW Statutory Requirements.**

**G.1 75% Very Low Income – Local, Non-Traditional.**  
 HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA’s most recently completed Fiscal Year for its Local, Non-Traditional program households.

Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
<b>Total Local, Non-Traditional Households</b>	<b>0</b>

\*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

**G.2 Establishing Reasonable Rent Policy.**

N/A

**G.3 Substantially the Same (STS) – Local, Non-Traditional.**

Questions	Input options and instructions
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0# of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0# of unit months

**Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:**

PROPERTY NAME/ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
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Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
<b>1 Person</b>	<b>0</b>
<b>2 Person</b>	<b>0</b>
<b>3 Person</b>	<b>0</b>
<b>4 Person</b>	<b>0</b>
<b>5 Person</b>	<b>0</b>
<b>6+ Person</b>	<b>0</b>
<b>Totals</b>	<b>0</b>

<b>H.</b>	<b>Public Comments.</b>
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H.1	Input options and instructions
Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.	(To be amended. The scheduled Comment Period is March 11, 2024 through April 11, 2024.)
Please attach a narrative describing the MTW agency’s analysis of the comments and any decisions made based on these comments.	N/A
If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	N/A
If yes, please attach the comments received along with the MTW agency’s description of how comments were considered.	N/A

<b>I</b>	<b>Evaluations.</b>
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	No evaluations at this point.
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**MTW 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 MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (DD/MM/YYYY), hereinafter referred to as "the MTW Supplement", 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 MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply 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.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW 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.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW 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.
- (14) The MTW 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.



- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW 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 MTW 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.
- (17) With respect to public housing and applicable local, non-traditional development the MTW 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.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

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**MTW PHA NAME**

\_\_\_\_\_  
**MTW 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).*

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

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

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

\_\_\_\_\_  
**DATE**

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