

# FY2024 MOVING TO WORK ANNUAL PLAN

**Orlando Housing Authority Executive Office**

April 1, 2023 through March 31, 2024

Anticipated Submittal 1/2023

THE ORLANDO HOUSING AUTHORITY

# FY2024 Moving to Work (MTW) Annual Plan

April 1, 2023 – March 31, 2024

<b>Table of Contents</b>	<b>PAGE</b>
<b><u>Section I: Introduction</u></b>	<b>4-7</b>
<b>A. Overview of OHA's Short-Term and Long-Term Goals and Objectives</b>	<b>5-7</b>
MTW Activities	5-6
Non-MTW Activities	6-7
<b><u>Section II: General Housing Authority Operating Information</u></b>	<b>8-14</b>
<b>A. Housing Stock Information</b>	<b>9-13</b>
Planned New Public Housing Units	9
Planned Public Housing Units to be Removed	9
Planned New Project-Based Vouchers	9
Planned Existing Project-Based Vouchers	9-11
Planned Other Changes to MTW Housing Stock Anticipated in the Plan Year	12
General Description of All Planned Capital Expenditures During the Plan Year	13
<b>B. Leasing Information</b>	<b>13-14</b>
Planned Number of Households Served	13
Discussion of Any Anticipated Issues/Solutions Related to Leasing	13-14
<b>C. Waiting List Information</b>	<b>14</b>
Waiting List Information Anticipated	14
Planned Changes to Waiting List in the Plan Year	14
<b><u>Section III: Proposed MTW Activities</u></b>	<b>15-16</b>
None	16
<b><u>Section IV: Approved MTW Activities</u></b>	<b>17-28</b>
<b>A. Implemented Activities</b>	<b>18-24</b>
Activity 1: \$225 Minimum Rent for Non-Elderly & Non- Disabled Households	18
Activity 2: Streamline the Recertification in Public Housing & Housing Choice Voucher Programs	19-20
Activity 6: Provide Up to 50 One & Two Bedroom Units & Supportive Services At West Oaks Apartments	21
Activity 8: Project Based Vouchers in OHA Owned Units	22
Activity 9: Establishment of Agency-Wide \$100 Minimum Rent	23
Activity 10: Tenant- Based Voucher Homelessness Prevention Program	24
<b>B. Not Yet Implemented Activities</b>	<b>25-28</b>
Activity 11: Project-Based Homeownership Program	25-26
Activity 13: Streamlined Public Housing Inspections	26
<b>C. Activities on Hold</b>	<b>27</b>
None	27

<b>D. Closed Out Activities</b>	<b>27-28</b>
Activity 3: Streamline the Rent Calculation Process in Public Housing & Housing Choice Voucher Programs	27
Activity 4: Consolidation of Inspection and Recertification Requirements to Establish An Inspection Process Based on Geographic Location	27
Activity 5: Supporting Up to 50 Homeowners for Six Months Each by Providing Interim Financial Assistance (vouchers) and Counseling to Prevent Foreclosures	27
Activity 7: Use of Project-Based Vouchers & Other Resources to Develop Low-Income City Donated Property for Low-Income Elderly Housing, in Conjunction with Redevelopment of Jackson Court/Division Oaks	28
Activity 12: Tenant-Based Rental Assistance Program	28
<b><u>Section V: Sources and Uses of Funds</u></b>	<b>29-32</b>
<b>A. Sources and Uses of MTW Funds</b>	<b>30-31</b>
Estimated Sources of MTW Funds	30
Estimated Uses of MTW Funds	30-31
Description of Planned Use of MTW Single Fund Flexibility	31-38
<b>B. Local Asset Management Plan</b>	<b>32</b>
Local Asset Management Plan	32
<b>C. Rental Assistance Demonstration (RAD) Participation</b>	<b>32</b>
Description of RAD Participation	32
<b><u>Section VI: Administrative</u></b>	<b>33-34</b>
<b>A. Board Resolution and Certifications of Compliance</b>	<b>34</b>
Certification of Consistency – Orange County	34
Certification of Consistency – City of Orlando	34
<b>B. Information regarding Public Comment Period</b>	<b>35</b>
<b>C. Evaluations of Demonstration Period</b>	<b>35</b>
<b>D. Lobbying Disclosures</b>	<b>35</b>
<b><u>Section VII: Appendix</u></b>	<b>35-37</b>
<b>A. LAMP</b>	<b>36-37</b>

**SECTION I**  
**INTRODUCTION**

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## SECTION I – INTRODUCTION

An Overview of the Orlando Housing Authority's (OHA) Short-Term and Long-Term Goals and Objectives

### **MTW Activities**

As a MTW agency, the OHA is allowed to modify certain requirements to achieve one or more of the following MTW statutory objectives:

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

In general, the OHA's short term and long-term goals are to continue implementing the current MTW activities and uses of funds. One goal of the OHA is to reposition the OHA housing stock by demolishing the Lake Mann, Griffin Park, Ivey Lane, Reeves Terrace, Murchison Terrace, and Lorna Doone developments. The OHA has submitted applications to the Special Applications Center (SAC) with the intention of revitalizing those neighborhoods with innovative housing. The OHA is also investigating alternative repositioning options including, RAD, and RAD/Section 18 Blend. OHA intends to pursue a FY 2023 HUD Choice Neighborhoods Planning Grant to include redevelopment of two (2) public housing complexes; Lake Mann Homes and Murchison Terrace Apartments. The Authority will identify needed changes to its ongoing MTW activities and uses of funds, and will seek HUD approval for any significant changes.

All activities and uses of funds are discussed, in detail, in the plan. In FY2024, the OHA is re-proposing two (2) previously approved activities, due to planned significant changes in rent reform, to the U.S. Department of Housing and Urban Development's (HUD) for approval.

Activity 1: \$225 Minimum Rent for Non-Elderly and Non-Disabled Households. The OHA modified this activity, in FY2021, from a \$225 rent floor to a \$225 minimum rent and added a minimum work requirement. Additional rent reform measures were proposed to simplify rent calculations, increase revenue for the OHA, and encourage self-sufficiency amongst the residents and participants. These new measures were implemented fall 2019.

Activity 2: Streamline the Recertification Process in the Public Housing and Housing Choice Voucher Programs has been fully implemented. One-third of the OHA's population takes part in a full recertification, while the remaining two-thirds complete an annual update.

Activity 8: Project-Based Vouchers in OHA Owned Properties has been fully implemented and is currently in an ongoing progress of placement.

Activity 9: Establishment of an Agency-Wide \$100 Minimum Rent. This activity is applicable to all households except non-elderly & non-disabled residents & participants, VASH, Tenant Based Rental Assistance participants (non-MTW), Tenant Based Rental Assistance participants (Activity 10), and Antioch residents (non- MTW). It has been fully implemented. Other rent reform measures were proposed, in FY2021, to simplify rent calculations and increase revenue for the OHA. These new measures were implemented fall 2019.

Activity 10: Tenant-Based Voucher Homelessness Prevention Program has been implemented and progress is being made.

Activity 11: The Project-Based Homeownership Program, which is a Section 8 Project-Based Homeownership Program, begins with the development of 46 homeownership units at Carver Park. The OHA is partnering with the City of Orlando Community Redevelopment Agency to develop 41 homes, and the OHA will develop the remaining 41 homes. Planning is currently underway.

Activity 13: Streamlined Public Housing Inspections allows the OHA to inspect the public housing units of those residents that are due for their triennial recertification. The OHA looks forward to the implementation of this activity and the opportunity to evaluate how it assists the OHA in meeting MTW objectives.

### **Non-MTW Activities**

The OHA administers a number of non-MTW programs. Such programs include, but are not limited to, the following:

- (1) vouchers for non-elderly persons with disabilities (NED),
- (2) HUD Veteran Affairs Supportive Housing (VASH) vouchers,
- (3) vouchers for single-room occupancy (SRO),
- (4) family unification vouchers (FUP),
- (5) resident opportunities and supportive services (ROSS),
- (6) family self-sufficiency program (FSS),
- (7) non-public housing or Housing Choice Voucher (HCV) units,
- (8) administration of the Sanford Housing Authority (SHA) by way of an interlocal agreement
- (9) administration of OHA vouchers in the Sanford jurisdiction
- (10) Mainstream (NED), and
- (11) Emergency Housing Voucher Program (EHV) for the Homeless

These programs are essential in their support and assistance to residents and participants that are not involved in MTW activities. For uniformity, the OHA received HUD approval to extend the MTW flexibilities to the Orlando Housing Authority Special Purpose Vouchers in the Sanford jurisdiction. The OHA is now able to apply these flexibilities to its Single Room Occupancy (SRO) program, as well.

The OHA's non-public housing complexes are located at West Oaks Apartments (180 one- and two-bedroom units) and Antioch Manor (a project-based section 202 property consisting of 101 units for the elderly). The OHA's other non-public housing unit is the 75-unit Jackson Court/Division Oaks Development, which is owned by Orlando Properties Inc. Jackson Court is a 58 unit, 3 story senior housing apartment complex with one-bedroom units only. Division Oaks is a two story, 17-unit family apartment complex.

In addition, the OHA maintains oversight of the Carver Park HOPE VI development, which includes The Landings at Carver Park and The Villas at Carver Park. The Landings at Carver Park is 56 units of affordable housing for families (26 tax credit units and 30 tax credit/public housing hybrid units). The Villas at Carver Park is a 64-unit tax credit/public housing apartment complex for the elderly.

The OHA's long term plan for its non-MTW programs is to continue implementing the project-based voucher (PBV) activity at OHA owned sites. The OHA will also continue to manage its properties and to seek opportunities to increase its housing portfolio, so that additional affordable housing options are available to the community. In addition, the OHA is committed to improving the quality of housing to its residents as funding permits.

Lift Orlando, a local non-profit organization whose mission is to break the cycle of poverty through neighborhood revitalization, has partnered with the OHA to redevelop Orlando's Washington Shores community – Pendana, formerly The Villages of West Lakes. Now Washington Shores includes the OHA's LakeMann Homes and Lorna Doone Apartments. Lift Orlando has embarked on the redevelopment of a significant area of blighted housing west of downtown Orlando. The OHA is partnering by providing 20 project-based vouchers for low-income families and 24 PBVs for seniors to improve affordability.

### **Project-Based VASH**

The OHA will project-base forty-five (45) Veterans Affairs Supportive Housing (VASH) vouchers at select locations within Orange and Seminole Counties. The OHA will collaborate with viable partners in the community to execute this initiative with the purpose of housing difficult to place homeless veterans.

**Rental Assistance Demonstration Program**

The OHA received HUD approval for a Rental Assistance Demonstration (RAD) Portfolio Award for the Citrus Square public housing site in March 2015; Citrus Square Apartments is the only OHA RAD property. Although, the OHA applied for and was awarded HUD RAD applications at other OHA properties, the OHA decided not to pursue RAD conversions at any of its approved properties.

Citrus Square Apartments

Citrus Square Apartments, built in 1982, is an 87-unit, multi-family property comprising 45 buildings situated on 10 acres in east Orlando. The OHA submitted a RAD application in December 2013 to convert units at Citrus Square to Project Based Vouchers (PBV) under the RAD program. The Citrus Square RAD Conversion closed on December 28, 2017. Ovation Housing LLLP owns Citrus Square, and Stephenson and Moore, Inc. manages the property.

Other Public Housing Sites

OHA seeks to reposition six (6) public housing sites Lake Mann, Griffin Park, Ivey Lane, Reeves Terrace, Murchison Terrace, and Lorna Doone developments. The OHA submitted Section 18 Inventory Removal Applications (demolition) to the Special Applications Center (SAC) with the intention of revitalizing those neighborhoods with innovative housing. OHA is also evaluating alternative repositioning options including, RAD, and RAD/Section 18 Blend and the HUD Choice Neighborhoods Program. OHA intends to pursue a FY 2023 HUD Choice Neighborhoods Planning Grant to include redevelopment of Lake Mann Homes and Murchison Terrace Apartments.

**Sanford Housing Authority (SHA)**

The OHA continues to manage the Sanford Housing Authority (SHA). The goals and objectives for the SHA are to redevelop its former public housing sites. In FY2019, The OHA and SHA broke ground on the new Georgetown Square in Sanford. Construction was completed in January 2021. The SHA also broke ground on Monroe Landings which was completed in February 2022. Somerset Landings is also in underwriting and will have a financial closing in the third quarter of 2022. Additionally, the SHA under the day-to-day management of OHA is working on a design of over 110 single family homes for sale, 10 rental townhomes, a resource center/SHA office, 160 multifamily rental units. OHA plans to include 63 Project Based Vouchers in Somerset Landings.

**SECTION II**  
**GENERAL HOUSING AUTHORITY**  
**OPERATING INFORMATION**

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## SECTION II - GENERAL HOUSING AUTHORITY OPERATING INFORMATION

### A. HOUSING STOCK INFORMATION

#### i. Planned New Public Housing Units

ASSET MANAGEMENT PROJECT (AMP) FILL IN NAME AND NUMBER	0/1 Bdm	2 Bdm	3 Bdm	4 Bdm	5 Bdm	6+ Bdm	TOTAL UNITS	POPULATION TYPE**	Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing / Vision)
PIC Dev. #/AMP PIC Dev. Name	0	0	0	0	0	0	0	N/A	N/A	N/A
<b>Total Public Housing Units to be Added in the Plan Year:</b>							<b>0</b>			

#### ii. Planned Public Housing Units to be Removed

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
N/A		
<b>TOTAL:</b> Public Housing Units to be Removed in the Plan Year	<b>0</b>	

#### iii. Planned New Project Based Vouchers

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Monroe Landing	20	No	Monroe Landings is a 60-unit new development family property in the City of Sanford, FL. The OHA used 20 PBV vouchers to support the units that are 30% AML.
Somerset Landings	63	No	The Somerset Landings is a 84-unit development family that is under construction in the City of Sanford, FL. The OHA will 63 PBV vouchers to support the units that are 30% AML.
<b>TOTAL:</b> Planned new Project Based Units in Plan Year	<b>83</b>		

#### iv. Existing Project Based Vouchers

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Citrus Square	87	Leased	Yes	Citrus Square Apartments is located at 5625 Hickey Avenue. The property consists of 45 buildings and includes (9) 1-bedroom units; (56) 2-bedroom units; (18) 3- bedroom units and (4) 4-bedroom units. The RAD Conversion of Citrus Square allows for the proper maintenance of the complex, necessary repairs/upgrades, and the improvement of accessible units. The RAD conversion closed in December 2017.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
West Oaks	12	Committed and Leased	No	<p><b>Activity 6: Transitional Housing</b>                      The OHA is project-basing up to fifty units to provide transitional housing to homeless individuals (up to twenty- four months) at West Oaks Apartments, a three story 280-unit affordable market rate rental property. The OHA is working with the Salvation Army, the Orlando Union Rescue Mission, and other service providers to provide case management as a homelessness preventative measure. A total of ten (10) vouchers/units are to be committed for Activity 6 by the end of FY2024.</p>
Jackson Court/Division Oaks /West Oaks	75	Committed and Leased	No	<p><b>Activity 8: PBVs in OHA Owned Units</b>                      The OHA is project-basing up to 20% or 538 of its available tenant-based HCVs at OHA owned units. Jackson Court, Division Oaks, and West Oaks (in addition to the vouchers to be used in connection with Activity 6) are sites for the project-based voucher program.</p>
Pendana at WestLake (Phase I)	20	Committed and Leased	No	<p>Lift Orlando has embarked on the redevelopment of a significant area of blighted housing west of downtown Orlando in the Washington Shores Community, now known as West Lakes. Lift Orlando partnered with the OHA to help make the new housing more affordable. Orlando's Washington Shores community, formerly The Villages of West Lakes, Pendana Phase I, is complete.                      OHA provided 20 project-based vouchers for the chronic and low-income homeless.</p>
Pendana at WestLake (Phase II)	24	Committed and Leased	No	<p>Lift Orlando has embarked on the redevelopment of a significant area of blighted housing west of downtown Orlando in the Washington Shores Community, now known as West Lakes. Lift Orlando partnered with the OHA to help make the new housing more affordable. Orlando's Washington Shores community, formerly The Villages of West Lakes. Pendana Phase II for is complete.                      OHA provided 24 project-based to improve affordability for low-income seniors.</p>

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Redding Gardens / GeorgetownSquare	28	Committed	No	The OHA manages the Sanford Housing Authority's (SHA) day to day operations and redevelopment. The SHA received a tax credit award to redevelop 90 units at the former Redding Gardens site. The tax credit market saw a sharp drop in equity causing a gap in funding. The developer, Gardner Capital, requested PBVs to be placed in the project, so that additional debt could be used along with a Florida Housing Finance Corporation loan to cover the gap financing.
Carver Park	36	Committed	No	The OHA will build 41 homes on the undeveloped lots west of Westmoreland Drive at Carver Park. Five (5) of those homes will be sold through the OHA at market rate, and the remaining 36 homes will be project-base voucher rentals.
<b>Total:</b> Planned Existing Project-Based Vouchers	282			

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### PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR

The OHA executed a Section 504 and a Section 3 Voluntary Compliance Agreement (VCA) with HUD in April 2015. The VCAs' duration is for a minimum of three years. The agreements include but are not limited to the following highlights:

#### Section 504 VCA

- Hire a 504/ADA/Reasonable Accommodation Coordinator (complete)
- Construct or convert a minimum of 5% or 76 public housing units into UFAS-accessible units. The construction ranges from minor or moderate modifications to major rehabilitation.
- Modify existing policies; specifically resident transportation, effective communication, transfers, service/emotional support animals, and reasonable accommodations.
- Supplement OHA's existing educational program to improve employees' ability to understand disability related laws.
- Provide initial and refresher notices to head of households describing the Agreement. Also provide copies of the Agreement to each manager and duly elected Resident Council.

#### Section 3 VCA

- Hire a Section 3 Coordinator (complete)
- Supplementation of the already existing Section 3 Plan.
- Supplementation of the staff educational program related to the requirements of Section 3.
- Providing training for all current and new employees who are responsible for any Section 3 activities.

On January 13, 2020, HUD issued a Letter of Closure on the Section 3 VCA. Further monitoring is no longer required although OHA will continue to fully comply with applicable requirements.

On November 13, 2017, the OHA executed an Amended Section 504 Agreement. The term of the Amended Section 504 Agreement is for a minimum of 5 years. The Amended Section 504 Agreement includes but is not limited to the following highlighted requirements:

- Modification of the OHA reasonable accommodation policy and procedures.
- Notifying residents and participants of delays in processing reasonable accommodation requests.
- Tracking implementation dates of approved reasonable accommodations.
- Engaging in the interactive process with Section 8 landlords to facilitate the implementation of approved reasonable accommodations.
- Reviewing the public housing Needs Assessment submitted to FHEO on December 1, 2015 to ensure that any outstanding items have been addressed. Conduct a new Needs Assessment of the Section 8 program.
- Modify the letter sent to applicants to notify them of their status on the wait list.

#### Private Management Company

OHA plans on outsourcing its property management for four (4) of its remaining properties

- Meadow Lake
- Marden Meadows
- Omega Apartments
- Johnson Manor Apartments

**GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR**

The OHA plans to reposition six of its properties: Griffin Park, Lake Mann, Lorna Doone, Murchison Terrace, Ivey Lane, and Reeves Terrace. This will entail demolition, relocation of the residents, and the redevelopment of the properties. The OHA plans to continue to address its health and safety needs at its public housing sites.

The OHA will continue to use Capital Funds in FY2024 to retrofit units to meet VCA/ADA/UFAS requirements at many of its properties.

**B. Leasing Information**

**i. Planned Number of Households Served**

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLD TO BE SERVED**
MTW Public Housing Units Leased	14,388	1,199*
MTW Housing Choice Vouchers (HCV) Utilized	34,104	2,842
Local, Non-Traditional: Tenant-Based <sup>^</sup>	255	46
Local, Non-Traditional: Property-Based <sup>^</sup>	1,044	87
Local, Non-Traditional: Homeownership <sup>^</sup>	0	0
<b>Planned Total Households Served:</b>	<b>49,791</b>	<b>4,174</b>

\*1458 – 87 – 172 = 1199 (Original baseline minus removed public housing units from Citrus Square Apartments and Griffin Park)

Local, Non-Traditional Category	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	Homelessness Prevention Program (Activity 10)	552	46
Property-Based	Jackson Court/Division Oaks/West Oaks (Activity 8)	900	75
Property-Based	West Oaks (Activity 6)	144	12
Homeownership	N/A	0	0

**ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing**

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	<p>The OHA is repositioning a significant portion of its public housing stock. This process will take a number of years. Once the OHA receives SAC approval for demolition, residents will be leased up at sites that are not scheduled for repositioning or issued vouchers if the residents qualify. Public housing units, at sites scheduled for demolition, may be held as a result. The OHA's public housing lease rates may decline as we hold units for relocation – 169* units were held vacant for the relocation of the Griffin Park residents. OHA has since relocated all Griffin Park residents to other OHA public housing units that were held to accommodate relocation. As residents are issued and accepting tenant protection vouchers, residents will move out of MTW Public Housing into HCV Program and this will create vacancies.</p> <p>*A total of 172 Units, 2 units for Management office relocation and 1 unit for Community meeting room.</p>
MTW Housing Choice Voucher	<p>Funding is a potential issue for the HCV program. Funding levels from HUD have continued to be below the amount needed to fund the program. The OHA may not have enough administrative support to comply with HUD's leasing requirements. The OHA has increased the flexibility of its HCV occupancy standards to be the same as public housing's minimum and maximum number of persons per bedroom for all bedroom sizes as a remedy to some of its leasing challenges.</p> <p>Finding owners willing to rent to HCV participants is another issue. The OHA will offer increased payment standards (up to 120% of the Fair Market Rent) for disabled participants who are having difficulty finding units within the regular payment standard.</p>
Local, Non-Traditional	<p>West Oaks has a high occupancy rate year over year. West Oaks will continue to work with local service providers to serve and possibly increase the number of units used under its MTW flexibilities.</p> <p>Currently there are no issues at either property with lease up.</p>

**C. WAITING LIST INFORMATION**

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
MTW Public Housing Units	Community Wide	8,728	Open	Yes
MTW Housing Choice Voucher	Community Wide	14,606	Closed	No
MTW Public Housing Units	Site-Based*	712	Closed	No

\*This includes Carver park Villas & Carver Park Landings

**i. Planned Changes to Waiting List in the Plan Year**

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
N/A	N/A

# SECTION III

## PROPOSED MTW ACTIVITIES

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### SECTION III – PROPOSED MTW ACTIVITIES

The OHA is not proposing any new activities for the FY2024.

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## **SECTION IV**

### **APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED**

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## SECTION IV - APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

### A. Implemented Activities

#### Activity 1: \$225 Minimum Rent for Non-Elderly and Non-Disabled Households

Approval & Implementation Year: Activity 1 was first approved in FY2012. The phased-in implementation began in the Initial Demonstration Period. Activity 1 was reformed, re-proposed, and approved in FY2020. The phased-in implementation began in FY2020.

Description: The OHA implemented a self-sufficiency rent floor of \$225 for public housing and HCV households that are not elderly and not disabled. A referral to the MTW Resource Center, for these households not paying the minimum \$225 rent floor, was also implemented. The implementation of the \$225 rent floor provides hardship exceptions linked to self-sufficiency activities. The MTW Resource Center provides self-sufficiency services including, but not limited to, case management, needs assessments, employability counseling, and job referral/placement assistance services for a maximum of two years for each adult referred. Use of a computer lab, transportation (bus passes), and childcare assistance is provided to help participants secure and maintain employment. The OHA monitors the progress of households subject to the rent floor relative to accomplishing the goals identified in their self-sufficiency plan until sufficiency is reached. Residents and participants that are unable to pay the rent floor or attend the Resource Center may seek hardship relief.

In FY2020, the OHA re-proposed Activity 1. The OHA modified the activity from a \$225 rent floor to a \$225 minimum rent and added a minimum work requirement. Additional rent reform measures, such as the elimination of all household deductions and a standard utility allowance based on bedroom size, were also added to simplify rent calculations, increase revenue for the OHA, and encourage self-sufficiency amongst the residents and participants.

Status: Implemented. This new rent policy is being implemented over a period of three (3) years. New rents will be calculated at the full triennial recertification of each resident and participant beginning in the fall of 2019.

Planned Non-Significant Changes: None.

Planned Changes to Metrics/Data Collection: OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Planned Significant Changes: None.

## **Activity 2: Streamline the Recertification Process in the Public Housing and Housing Choice Voucher Programs**

Approval & Implementation Year: Activity 2, in its current form, was approved in FY2015 (November 2014). The phased-in implementation began in FY2015.

Description: The OHA is streamlining the recertification process in the public housing and HCV programs by conducting recertification of all residents and participants every three years (triennial). This means that every three years, residents and participants will come into the office to conduct the traditional recertification with the exception of a modified 3<sup>rd</sup> party verification and \$25,000 asset disregard.

The streamlined recertification began in 2015. The OHA recertified one third of all residents and participants in FY2015, one-third in FY2016, and the last one-third in 2017. In 2018, the OHA recertified another one-third of its residents and participants. Thereafter, the OHA will continue implementing this activity by recertifying one third (1/3) of its full population each year.

In its FY2016 MTW Plan, the OHA received HUD approval to apply all aspects of this activity to NED, FUP, VASH and OHA Special Purpose vouchers. In FY2017, the OHA sought to modify this activity to add its Single Room Occupancy (SRO) voucher program, which was approved. The OHA applied this change in FY2018. Due to the extended recertification period, the OHA has created a local form 9886, Authorization for Release of Information. The local form captures the same information as the HUD form 9886 except that the resident/participant's consent for release of information will be extended from 15 months to 36 months as needed to update the resident/participant's data between each triennial recertification.

### *OHA Annual Online Updates*

In the years when residents and participants do not have their scheduled recertification, they will have an annual online update. The OHA will use this as an opportunity to conduct an audit to review the household composition, tax return, and criminal background check. During the annual online update, the OHA will recalculate rent in the following circumstances:

1. If the total tenant payment (TTP) increases or decreases by \$100 or more
2. If the family size/household composition changes in such that a person with new income is added to the household
3. Hardships
4. Criminal background checks leading to termination
5. Reasonable Accommodations

### *OHA Elimination of Interim Recertifications*

The OHA will continue to streamline the recertification process by eliminating interim recertification completely except for hardships, audits (including criminal background checks, change in family size/household composition<sup>1</sup>), and reasonable accommodations for all residents and participants.

### *Flat Rent*

The OHA public housing residents are granted the ability to choose the Flat Rent Option twice per year rather than annually. Elderly and disabled residents/participants with fixed incomes and flat rents will have a triennial reexamination only. They will not be subject to the annual online update.

Status: Implemented. Triennial recertifications are underway for both HCV and public housing. The HCV program now offers participants the option to go online or call to schedule an appointment with an eligibility specialist. Public Housing plans to offer residents the option to schedule appointments online or by phone but currently utilizes the traditional method of issuing appointment dates and times by mail. The OHA has added its Single Room Occupancy (SRO) voucher program to this activity. The triennial schedule remains the same.

The OHA has implemented annual online updates, which allows residents and participants to verify household composition, income and assets online. The updates include resident/participant submission of a personal declaration form, verification of IRS tax filing, and other documents. In FY 2023, OHA will have Kiosks available for residents to submit their documentation for recertifications.

Planned Non-Significant Changes: None.

Planned Changes to Metrics/Data Collection: The OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Planned Significant Changes: None.

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## **Activity 6: Provide up to 50 One and Two-Bedroom Units and Supportive Services at West Oaks Apartments for up to 24 Months for Homeless Individuals**

Approval & Implementation Year: Activity 6 was first approved in FY2012. The phased-in implementation began in September 2013.

Description: The OHA is providing up to 50 project-based vouchers for one- and two-bedroom units at West Oaks Apartments without a competitive process. This transitional housing will be available to agencies that commit to provide supportive services to homeless individuals for up to 24 months.

Status: Implemented. HUD has approved all 50 project-based vouchers to be used in coordination with homeless service providers. At the end of FY2021, 20 vouchers have been or were in use on a rotating basis, and the OHA projects having ten (10) project based vouchers in use by the end of FY2024. There isn't a waiting list for MTW units at West Oaks. The referrals are generated from our partners. When our partners refer someone and the person qualifies, we may or may not have a unit available and they must wait until we do. With the rent increase in Orlando we have very few unit vacancies per month. Our unit turns have dropped dramatically.

Planned Non-Significant Changes: None. We consider walk ins, Orange County Tenant Based Section 8, VASH Tenant Based Section 8, VASH pbv (5) and MTW when there are just a few units available each month. We make MTW and VASH pbv a priority, but when we have a lot of people in need of housing with very few vacancies. We also don't receive as many referrals from the housing partner partly due to their own internal turnover of counselors. As an example, we have only received 1 referral over the last six months.

Planned Changes to Metrics/Data Collection: OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year. During the period of lock downs and COVID restrictions a drop in numbers occurred and has not increased again as of yet.

Planned Significant Changes: None.

**Activity 8: Project-Based Vouchers in OHA Owned Units**

Approval & Implementation Year: Activity 8 was first approved and the phased-in implementation began in FY2016.

Description: The OHA will project-base up to 20% of its available tenant-based section 8 vouchers at OHA owned units. HUD approved MTW flexibilities to allow the OHA to implement this activity without engaging in a competitive process. The OHA was also granted approval to conduct its own inspections and rent reasonableness functions.

The OHA is implementing its project-based voucher program at Jackson Court, Division Oaks, and West Oaks which are approved sites for the project-based voucher program. The vouchers at West Oaks will be in addition to the PBV vouchers discussed in Activity 6 (transitional housing for the homeless). Additionally, the OHA will build 41 (forty-one) homes on the undeveloped lots west of Westmoreland Drive at Carver Park. Five (5) of those homes will be sold at market rate, and the remaining 36 (thirty-six) homes will be project-base voucher rentals.

Status: Implemented. At the end of FY2021, 95 PBVs have been or were in use on a rotating basis at Jackson Court and Division Oaks. The OHA has yet to start development at Carver Park for the 36 PBVs. Although this activity contemplates that the OHA will develop new properties and/or acquire existing properties in which certain units will qualify for PBV, no additional properties are anticipated for this activity in FY2024.

Planned Non-Significant Changes: None.

Planned Changes to Metrics/Data Collection: The OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Planned Significant Changes: None.

**Activity 9: Establishment of Agency-Wide \$100 Minimum Rent**

Approval and Implementation Year: Activity 9 was first approved and implemented in FY2016. Activity 9 was reformed, re-proposed, and approved in FY2020. The phased-in implementation began in FY2020 and has been fully implemented.

Description: The OHA utilized its MTW flexibilities to establish a minimum rent that exceeds \$50 for both the public housing and HCV programs. The OHA established an agency-wide minimum rent of \$100 for public housing, HCV, TBRA, PBV, OHA Special Purpose vouchers, FUP, NED, Port-ins, and SRO. Each household shall pay rent of at least \$100 after the provision of utility allowances.

Only VASH participants and homeless participants of the OHA Homelessness Prevention Program (Activity 10) are exempt from the \$100 minimum rent. Participants with income pay a minimum rent of fifty dollars (\$50.00), and participants with zero income pay zero dollars (\$0.00).

In FY2020, the OHA received approval to further augment the \$100 minimum rent. To simplify rent calculations and increase revenue for the OHA, all household deductions were eliminated and each household is given a standard utility allowance based on bedroom size.

Status: Partially implemented. This new rent policy will be fully implemented over a period of three (3) years. New rents will be calculated at the full triennial recertification of each resident and participant beginning in the fall of 2019.

Planned Non-Significant Changes: None.

Planned Changes to Metrics/Data Collection: The OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Planned Significant Changes: None.

**Activity 10: Tenant-Based Voucher Homelessness Prevention Program**

Approval & Implementation Year: Activity 10 was first approved in FY2016. The phase in implementation began in FY2016 with the City of Orlando and the OHA executing a memorandum of understanding.

Description: The OHA and the City of Orlando are partnering to administer a voucher program to address chronic homelessness as a part of the 25 Cities Initiatives. The Orlando Veteran's Affairs Medical Center is also a participant. Chronic homelessness is defined as adults with a disabling condition who have been continuously homeless for at least one year or have had four episodes of homelessness in the past three years. The disabling condition(s) limits an individual's ability to work or perform one or more activities of daily living and is defined as a diagnosable substance use disorder, serious mental illness, developmental disability or chronic physical illness.

In this activity, the City of Orlando refers chronically homeless persons under case management to the OHA as an applicant. Once the applicant is confirmed eligible, the OHA then provides a tenant-based voucher, and the City of Orlando provides services. These vouchers were turn over vouchers not a new increment from HUD awarded vouchers. These referrals bypass the HCV wait list and other eligibility criteria. Approximately 150 vouchers were pledged to help chronically homeless persons identified by the City of Orlando through this activity. The City of Orlando no longer provided the case management agreed upon in the MOU. OHA will continue to help 42 families under this activity. HUD awarded 154 Emergency Housing Vouchers to OHA to provide rental assistance to homeless individuals/families. Therefore, OHA discontinued the City of Orlando Homeless Program in June 2021.

Emergency Housing Vouchers: OHA implemented the Emergency Housing Voucher Program with the Central Florida Homeless Services Network. 154 Emergency Housing Vouchers were awarded by HUD in May 2021.

Status: Implemented.

Planned Non-Significant Changes: Using the Emergency Housing Vouchers to replace the vouchers with the City of Orlando.

Planned Changes to Metrics/Data Collection: OHA does not anticipate changes to the metrics, baselines, or benchmarks during the Plan year.

Planned Significant Changes: None.



B. Not Yet Implemented

**Activity 11: Project-Based Homeownership Program**

Approval & Implementation Year: Activity 11 was first approved in FY2018. The phased-in implementation has yet to begin as planning is still underway.

Description: The Orlando Housing Authority is implementing a HCVP Project-Based Home Ownership Program, over a ten (10) year period, with up to 82 homeownership units to be developed at Carver Park.

The OHA partnering with the City of Orlando Community Redevelopment Agency (CRA) and other stakeholders to construct 82 homeownership units at Carver Park. The site will be mixed income with a combination of affordable and market rate homes. OHA seeks to provide monthly homeownership assistance to some of the affordable buyers. Below is the chart detailing the proposed plan.

CARVER PARK UNIT MIX			East Westmorela (42)	West of Westmoreland (41)	
Residential Type	# of Units	#Bed/Bath	Homeownership (H/O)	H/O	Rental
Single Family	3*	4/2	6*	5	0
Single Family	8	3/2	6*	5	0
Townhome	38	3/2	26	0	12
Duplex (2/bldg)	14	3/2	10	0	4
Rowhome	20	2/2	0	0	20
Total	83		48	10	36

\* Completed Model Home

A preference for Carver Park homeownership opportunities will be offered to the following eligible households:

1. Households that relocated from Carver Court as a part of the Uniform Relocation Act
2. Current OHA public housing/Section 8 participants
3. Applicants on the OHA public housing and Section 8 waiting lists
4. Households currently living in the Parramore area (timeframe TBD)
5. Eligible OHA Employees - Excludes staff involved in the decision-making process and contractors/subcontractors that have any direct or indirect interest (24 CFR 982.161) in accordance with the general procurement standards (2 CFR 200.318)

While a preference for homeownership opportunities will be given to the abovementioned households, the OHA will consider other low-income households are ready for homeownership, in order to fulfill its commitment to the Carver Park community.

Status: The OHA will partner with the City of Orlando Community Redevelopment Agency to construct 41 units at Carver Park east of Westmoreland Avenue.

In November 2018, the OHA executed a Memorandum of Understanding (MOU) with the City of Orlando Community Reinvestment Authority (CRA) to complete the homeownership phase of the HOPE VI development east of Westmoreland Avenue. The MOU sets forth the general parameters for a formal agreement between the parties for construction and development of 41 homeownership units including between 13-19 homes affordable to low-income purchasers. The OHA will provide homeownership counseling to the affordable homebuyers through HUD Approved Counseling Agencies and may provide project-based vouchers (PBVs) in the form of mortgage subsidy or down-payment assistance.

The OHA and CRA will negotiate a formal agreement to finance the construction the completion of forty-one for sale homes east of Westmoreland Avenue. The CRA proposes to fund construction of 41 homes and provide substantial down-payment subsidy to between 13-19 affordable homebuyers. The OHA will build 41 (forty-one) units on the undeveloped lots west of Westmoreland Drive. Five (5) of those units will be for sale (market rate and affordable); the remaining 36 homes will be rental. A portion of the housing may be project-based voucher units.

Timeline: None as of yet. 2025 OHA anticipates construction of 41 units to start in 2024. This activity will be implemented upon completion of homes for affordable purchasers. OHA continues to negotiate a Term Sheet with the City of Orlando Community Redevelopment Authority (CRA). The Term Sheet will form the basis of formal Funding Agreement. The OHA and CRA are committed to implementation of this project.

Planned Non-Significant Changes: None.

Planned Significant Changes: None.

### **Activity 13: Streamlined Public Housing Inspections**

Approval & Implementation Year: Activity 13 was first approved in FY2019. The phased-in implementation has yet to begin.

Description: The OHA is streamlining inspections by conducting public housing unit inspections, by tenant, every three years (triennial) in tandem with triennial recertifications. Triennial inspections will replace annual inspections, and the OHA will provide strategic preventive maintenance at all properties throughout each year. Randomly selected units will be chosen from the 2/3 of public housing populace that will not receive the triennial inspection that fiscal year, for inspection. Those inspections will include building exterior/systems and common areas at all public housing properties. When tenants move out, the OHA will continue to conduct inspections of those units. Also, the OHA will continue to comply with all HUD authorized inspections and conduct 100% pre-inspections at each selected site annually.

Status: Not yet implemented. No action has been due to the pandemic.

Timeline: None as of yet.

Planned Non-Significant Changes: None.

Planned Significant Changes: None.

C. On Hold  
No activities.

D. Closed Out Activities

**Activity 3: Streamline the Rent Calculation Process in the Public Housing & Housing Choice Voucher Programs**

Approval and Implementation Year: Activity 3 was first approved in FY2012. Implementation of Activity 3 began in FY 2013.

Reason for Closing Out Activity: OHA combined activities 2 and 3. See section IV: Approved Activities.

Year Activity was Closed Out: FY 2015.

There are no HUD Metrics for this activity because this activity did not reach the data collection phase.

**Activity 4: Consolidation of Inspection and Recertification Requirements to Establish an Inspection Process Based on Geographic Location**

Approval and Implementation Year: Activity 4 was first approved in FY2012. Implementation of Activity 4 began in FY2013 with the inspection process based on geographic location.

Reason for Closing Out Activity: A key part of Activity 4 was to have a unified public housing and voucher inspection mechanism based on HQS standards. Activity 4 was closed out because HUD would continue to undertake UPCS public housing REAC inspections, thereby effectively causing the OHA also to use UPCS inspections for public housing. The OHA's basing of the inspection process on geographic location has been discontinued because inspection by geographic location would no longer efficient when the HQS standards could not be used for both public housing and section 8.

Year Activity was Closed Out: FY2014.

See FY2013 Report for the last activity 3 metrics.

**Activity 5: Supporting up to 50 Homeowners for Six (6) Months Each by Providing Interim Financial Assistance (vouchers) and Counseling to Prevent Foreclosures**

Approval & Implementation Year: Activity 5 was first approved in FY2012. The phased-in implementation began in FY2014.

Reason for Closing Out Activity: The climate for homeowners facing foreclosure had changed significantly from 2009, when this activity was first proposed. The OHA had identified a huge challenge in finding homeowners that will be "made whole" by providing six (6) months of financial assistance. Program revisions to provide a lump sum payment to the lender on behalf of an eligible program approved applicant to bring their mortgage loan current and move forward were not successful. The current households that met the eligibility requirements needed more money than the voucher program could offer.

Year Activity was Closed Out: FY2015.

See FY2014 Report for the last activity 5 metrics.

**Activity 7: Use of Project-Based Vouchers and Other Resources to Develop Low-Income City Donated Property for Low-Income Elderly Housing, in Conjunction with the Redevelopment of Jackson Court/Division Oaks**

Approval and Implementation Year: Activity 7 was first approved in FY2012.

Reason for Closing Out Activity: Activity 7 was closed out as it did not move beyond its planning stages. OHA and the City of Orlando unsuccessfully attempted to find land and funding for the redevelopment of Jackson Court/Division Oaks. Although OHA executed a Memorandum of Understanding with the Carver Theatre Developers (CTD), CTD's inability to procure construction financing prevented the activity from moving forward.

Year Activity was Closed Out: FY2014.

**Activity 12: Tenant-Based Rental Assistance Program**

Approval and Implementation Year: Activity 12 was first approved and implemented in FY2018.

Reason for Closing Out Activity: This activity was a program in which the OHA would provide funds for the first month's rent for homeless households and then receive a reimbursement from the City of Orlando. The OHA conducted a cost benefit analysis of this activity and concluded that the administrative burden of continuing this activity far outweighed the benefit to the community. The financial and human resources allocated to this activity could be better utilized elsewhere.

Year Activity was Closed Out: FY2018.

There are no HUD Metrics for this activity.

**SECTION V**  
**SOURCES AND USES OF FUNDS**

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**SECTION V – Sources and Uses of MTW Funds\***

**A. Sources and Uses of MTW Funds**

<b>Estimated Sources of MTW Funding for the Fiscal Year</b>		
<b>Sources</b>		
<b>FDS Line Item</b>	<b>FDS Line-Item Name</b>	<b>Dollar Amount</b>
70500 (70300+70400)	Total Tenant Revenue	\$4,255,440
70600	HUD PHA Operating Grants	\$36,090,796
70610	Capital Grants	\$1,293,236
70700		\$0
(70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$580,176
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$3,784,463
<b>70000</b>	<b>Total Revenue</b>	<b>\$46,004,112</b>

<b>Estimated Uses of MTW Funding for the Fiscal Year</b>		
<b>Uses</b>		
<b>FDS Line Item</b>	<b>FDS Line-Item Name</b>	<b>Dollar Amount</b>
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$3,793,714
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$6,147,520
92500 (92100+92200+92300+92400)	Total Tenant Services	\$506,317
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$1,301,262
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary maintenance	\$3,141,569
95000 (95100+95200+95300+94500)	Total Protective Services	\$580,948
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$631,854
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expense	\$528,565
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	Housing Assistance Payment + HAP Portability-In	\$27,788,681
97400	Depreciation Expense	\$956,463
97500+97600+97700+97800	All Other Expenses	\$0
<b>90000</b>	<b>Total Expenses</b>	<b>\$45,376,892</b>

\*Line 97400 is a non-cash expense. Once removed, OHA's total expenses are \$44,420,429.

**General**

The OHA plans to reposition six of its properties: Griffin Park, Lake Mann, Lorna Doone, Murchison Terrace, Ivey Lane, and Reeves Terrace. This will entail relocation of the residents, demolition, and the redevelopment of the properties. The OHA plans to continue to address its health and safety needs at its public housing sites.

The OHA will continue to use Capital Funds in FY2024 to retrofit units to meet VCA/ADA/UFAS requirements at many of its properties.

**ii. Description of Planned Use of MTW Funding Flexibility**

**Describe the Activities that Will Use Only MTW Single Fund Flexibility**

In addition to the activities described above, OHA continues to use the MTW Single Fund Flexibility to support Uses of Funds A.

**Use of Funds A: Comprehensive One-Stop Self-Sufficiency Resource Center**

Use of Funds Action A is to provide a Comprehensive One-Stop Self-Sufficiency Resource Center. The MTW Resource Center is linked to MTW Activity 1 – Phase in the implementation of a self-sufficiency rent floor of \$225 for households that are not elderly and not disabled. The implementation of the rent floor includes a referral to the MTW Resource Center for non-elderly and non-disabled households not paying \$225 at the time the rent floor is implemented. This activity has been modified from a \$225 rent floor to a \$225 minimum rent for households that are not elderly and not disabled. The implementation of the minimum rent now includes a referral to the MTW Resource Center for non-elderly and non-disabled heads or co-heads of households that are not employed by April 1, 2020, not employed the minimum number of hours (28 hrs/wk or 20 hrs/wk if full-time student) or experiencing an employment related hardship.

The MTW Resource Center provides self-sufficiency services, including but not limited to, case management, needs assessments, employability counseling, and job referral/placement assistance services for a maximum of two years for each adult referred. Use of a computer lab, transportation (bus passes) and childcare assistance is provided to help participants secure and maintain employment. The OHA monitors the progress of households subject to the rent floor relative to accomplishing the goals identified in their self-sufficiency plan until self-sufficiency is reached.

In the past, the MTW Resource Center has partnered with a number of agencies to provide services to residents referred to the Resource Center. The Resource Center plans to continue to develop and foster relationships that will help the OHA’s residents and participants become more self-sufficient.

The MTW Resource Center will continue to establish relationships with employers to facilitate job referrals and consequently strengthen and/or build economic self-sufficiency for the OHA participants and residents. In addition, the Resource Center will extend its partnership with CareerSource (formerly Work Force Center Florida) to bring employability workshops to the Ivey Lane Homes site using its mobile unit.

OHA estimates \$986,673 to be expensed for this endeavor.

**B. Local Asset Management Plan**

**LOCAL ASSET MANGEMENT PLAN**

<b>Is the PHA allocating costs within statute?</b>	No
<b>Is the PHA implementing a local asset management plan (LAMP)?</b>	Yes
<b>Has the PHA provided a LAMP in the appendix?</b>	Yes
<b>If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA doesnot plan to make any changes in the Plan Year</b>	OHA does not plan to makeany changes in the Plan Year

**C. Rental Assistance Demonstration (RAD) Participation**

- i. **Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.**

No

- ii. **If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?**

N/A



**SECTION VI**  
**ADMINISTRATIVE**

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**SECTION VI - ADMINISTRATIVE**

A. Resolution signed by the Board of Commissioners adopting the Annual MTW Plan Certification of Compliance (includes Certificates of Consistency)

- 1) Certificates of Consistency – Orange County
- 2) Certificate of Consistency – City of Orlando

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## **B. Information regarding Public Comment Period**

The MTW Plan will be made available for public review beginning Monday, September 19, 2022 through Thursday, October 20, 2022. The Public Hearing is scheduled for Thursday, October 20, 2022 at 2:00 p.m. at the OHA Administration Office, 390 N. Bumby Avenue, Orlando, Florida 32803.

The OHA will notify residents and the local community about the dates and time of the public hearing by placing ads in English in the Orlando Sentinel, Sanford Herald, and La Prensa (Spanish). Copies of the draft FY2024 MTW Plan will be made available at the Administrative offices of the OHA and SHA during the comment period.

The OHA will post this draft of the FY2024 Plan on its website to elicit comments from residents and the local community.

## **C. Evaluations of Demonstration Period**

The OHA would benefit most from an evaluation that covers a larger scope of implemented MTW activities; however, OHA will need more time to determine whether the metrics that have been chosen are effective in evaluating the activities. Therefore, an evaluation at this time does not seem prudent in FY2024.

## **D. Lobbying Disclosures**

**SECTION VII**  
**APPENDIX**

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## SECTION VII – APPENDIX

### Local Asset Management Program

As part of the Orlando Housing Authority's Amended and Restated Moving to Work Agreement, effective January 7, 2011, OHA has designed and implemented its Local Asset Management Program. The OHA is going to continue to implement its local asset management program for its Public Housing Program and describe such program in its Annual MTW Plan. The term "Public Housing Program" means the operation of properties owned or subsidized by the Agency that are required by the U.S. Housing Act of 1937. The Agency's local asset management program includes a description of how it is implementing project-based property management, budgeting, accounting, and financial management and any deviations from HUD's asset management requirements. The OHA describes its cost accounting plan (cost allocation plan) as part of its local asset management program.

The OHA maintains a project-based management approach which includes both the OHA-managed properties and its privately managed properties, under the Public Housing Program. Project-level budgeting and accounting is maintained for each of these Public Housing properties. In addition, mixed-finance rental community that contains Agency-assisted units under the Public Housing Program are owned, managed and operated by third party partnerships.

The OHA has developed its program to ensure that accounting and financial reporting methods comply with 2 CFR Part 200, Subpart E regarding cost allocations, 2 CFR Part 200, Subpart F regarding audit requirements, and accepted accounting practices (GAAP).

OHA's Public Housing Program's local asset management plan applies the following principles related to program costs:

- Costs incurred are deemed reasonable and consistent with the amended Moving to Work Agreement.
  - Costs shall be accorded consistent treatment.
  - Costs shall be determined in accordance with GAAP.
  - Costs are documented.
  - OHA will report results according to HUD MTW guidelines.
- 1) Budgeting and accounting - Operating budgets are developed and maintained annually at the property level. The groupings of like properties in a geographic location are called Asset Management Properties (AMPs). The related accounting activities are maintained at that level as well.
  - 2) Financial management - Financial reporting and analysis is performed and monitored on a monthly basis, at the property level. Financial reporting requirements are in accordance with the amended Moving to Work Agreement as well as 2 CFR Part 200, Subpart E.
  - 3) Cost Allocation Approach - OHA's Amended and Restated Moving to Work Agreement identifies either a "cost allocation" or "fee-for-service" option. OHA utilizes the cost allocation method. OHA is in keeping with 24 CFR 990 and uses property level management, accounting, and budgeting and has established a Central Office Cost Center (COCC). The costs of the COCC are allocated not only to Public Housing, but to the other programs managed by OHA

All direct and indirect costs are charged to the AMPs in accordance with 2 CFR Part 200, Subpart E. A cost may

be direct with respect to some specific service or function, but indirect with respect to the final cost objective. Direct costs associated with project activities are allocated to the specific properties receiving the benefit of the expenditure. Direct and indirect costs associated with the COCC are allocated on a reasonable basis and, if allocated to public housing properties, are substantially done using a project unit distribution basis.

The OHA has developed this program to ensure that accounting and financial reporting methods comply with 2 CFR Part 200, Subpart E regarding cost allocations, 2 CFR Part 200, Subpart F regarding audit requirements, and accepted accounting practices (GAAP).

#### **Cost Allocation Plan**

Under the MTW Agreement, the cost accounting options available to the Agency include either a “cost allocation” or “fee-for-service” methodology. The OHA approached its cost allocation plan with consideration to the entire operation of the Agency including the MTW Program. This cost allocation plan addresses the larger OHA operation as well as the specific information related to the MTW Program.

#### **Difference**

The OHA has the ability to define direct costs differently than the standard definitions published in HUD’s Financial Management Guidebook pertaining to the implementation of 24 CFR Part 990.

The OHA is required to describe any differences between the Agency’s Local Asset Management Program and HUD’s asset management requirements in its Annual MTW Plan in order to facilitate the recording of actual property costs and submission of such cost information to HUD.

The OHA determined to implement a cost allocation system that allocates COCC costs to all agency-wide programs. HUD’s Asset Management System focuses primarily on allocating costs to the Asset Management Properties (AMPs) and necessarily to other programs. This Cost Allocation Plan addresses the entire the OHA operation.

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