

MOVING TO WORK APPLICATION AND PLAN

FORT WAYNE HOUSING AUTHORITY

A Place to Call Home



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1. MOVING TO WORK PLAN

A. Vision for Fort Wayne Housing Authority's Moving to Work Program

The Fort Wayne Housing Authority (FWHA) is submitting a formal application to participate in the Moving to Work Expansion (MTW) under Cohort #2 – Rent Reform. The Fort Wayne Housing Authority is an innovative, progressive, high performing housing authority whose mission is to revitalize the city of Fort Wayne by building and developing safe, quality, affordable housing options while providing programs to foster community, alleviate poverty and encourage long-term economic self-sufficiency. The flexibilities allowed through the Moving-to-Work Program will enable the FWHA to develop affordable units further, promote greater self-sufficiency by streamlining processes, encourage greater landlord participation and reduce administrative burdens.

The MTW program was established in 1996. MTW is being expanded by an additional 100 PHA's over seven years. The FWHA submitted a letter of interest to HUD in May 2019 and was invited to apply for the demonstration. The vision of the FWHA is aligned with the overall goals of the MTW program,

Cost Savings

The FWHA hopes to reduce HAP expenditures and administrative costs by approximately 10% each year through the rent reform and waiver requests, thereby allowing the FWHA to house more families and lease, at minimum 100% of its voucher allocation. Additionally, the reduced number of required recertifications will allow for further administrative savings at the FWHA.

Self-Sufficiency for Residents

The FWHA is looking to incentivize families where the head of household is working, looking for work or going to school or a job training program to become self-sufficient. The FWHA has a robust Family Self-Sufficiency Program and Homeownership Program. The FWHA proposes to include families with children on the road to independence into the MTW demonstration with a modified FSS escrow structure. While some existing families may not be able to participate in the rent reform demonstration study, we believe they can significantly benefit from the rent reform policies and reduced recertifications. The FWHA's vision is to couple MTW flexibility with the rent reform policy so that new and existing Family Self-Sufficiency families can participate.

Housing Choice

The FWHA wants to increase housing choices for eligible low-income families. The FWHA recently applied for the HCV Mobility Demonstration program to encourage families with children to move to opportunity areas throughout the Fort Wayne community. We envision the

Comprehensive Mobility Related Services (CMRS) afforded to families through the mobility demonstration will be aligned with our MTW flexibilities to work in tandem to help families successfully move into homeownership and achieve housing stability in low poverty areas.

i. Skills and Experience of Fort Wayne Housing Authority Personnel

The Fort Wayne Housing Authority has a highly experienced and skilled workforce under the leadership of the CEO/Executive Director, Mr. George Guy. However, we realize that some initiatives require expert skill sets not readily available within the agency. As a result, the FWHA maintains a diverse, capable pool of private-sector experts and partners to fill any skill gaps needed to ensure the success of the FWHA programs and initiatives.

Mr. George Guy, CEO/Executive Director – George is a visionary, advocate and innovator. He has spent the past 25 years developing solutions to improve families' quality of life in underserved communities. When not leading the Fort Wayne Housing Authority, he serves as a board member of the United Way of Allen County, the Fort Wayne Urban League, and the Boys and Girls Club of Fort Wayne. He also serves on the Fort Wayne Area Planning Council on Homelessness and the Indiana Balance of State Continuum of Care Board.

Ms. Tiffany Gonzalez, Vice President of Operations – Tiffany oversees the operations of the HCV program, Enrichment and Career Services department and Procurement. Having previously served as the Chief Operating Officer at the Housing Authority of Champaign County, a current MTW agency, she has a wealth of experience developing and managing MTW initiatives and the funding flexibility that MTW allows. Tiffany holds a bachelor's degree from Ball State University. She also graduated from the Public Housing Authority Directors Association (PHADA) & Rutgers University's Executive Director Education Program (EDEP). She also holds approximately 20 Nan McKay housing certifications in an array of areas. Tiffany currently serves on the PHADA Bollinger Scholarship Committee and the National Association of Housing and Redevelopment Officials (NAHRO) Housing Committee, Legislative Taskforce Committee and as Vice President of Housing and Legislation for Indiana NAHRO.

Ms. Amy Jacobowitz, Vice President of Asset Management – Amy has been with the Housing Authority for eleven years. She has earned several certifications, including the Certified Apartment Manager (CAM), Public Housing Manager (PHM), Certified Asset Manager, and Certified Public Housing Asset Management for Executives, Certified Tax Credit Site Compliance Specialist, and the Tax Credit HCCP certification. Amy has more than thirty years of experience in Property Management. She is currently responsible for the oversight and management of 14 apartment communities and 51 scattered sites, totaling 754 subsidized and 161 tax credit units.

Ms. Zorya Elkins, HCVP Supervisor – Zorya will train, coach and mentor HCV staff to ensure accurate implementation of the MTW policies related to the HCV program.

Ms. Jessica Matuska, Special Assistant to the CEO/Executive Director – Jessica works closely with each department in the organization to ensure open lines of communication between the CEO and FWHA team. Jessica currently oversees the implementation of policies and procedures at FWHA and will be working closely with staff to prepare the MTW Plan.

Mr. Taylor Abdon, HCVP Housing Specialist – Taylor has a background in developmental psychology with a focus on research methodology and statistics. His expertise in data-driven projects and analytical skills will assist the FWHA in data analysis for the MTW program. Additionally, as the landlord liaison, Taylor's hands-on relationships with owners will help drive the FWHA marketing strategies and landlord incentive programs

ii. Statement of Fair Housing, Civil Rights Goals and Strategies

The Fort Wayne Housing Authority 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 FWHA's involvement and by maintaining records reflecting these analyses and actions.

B. Plan for Future Community/Resident Engagement

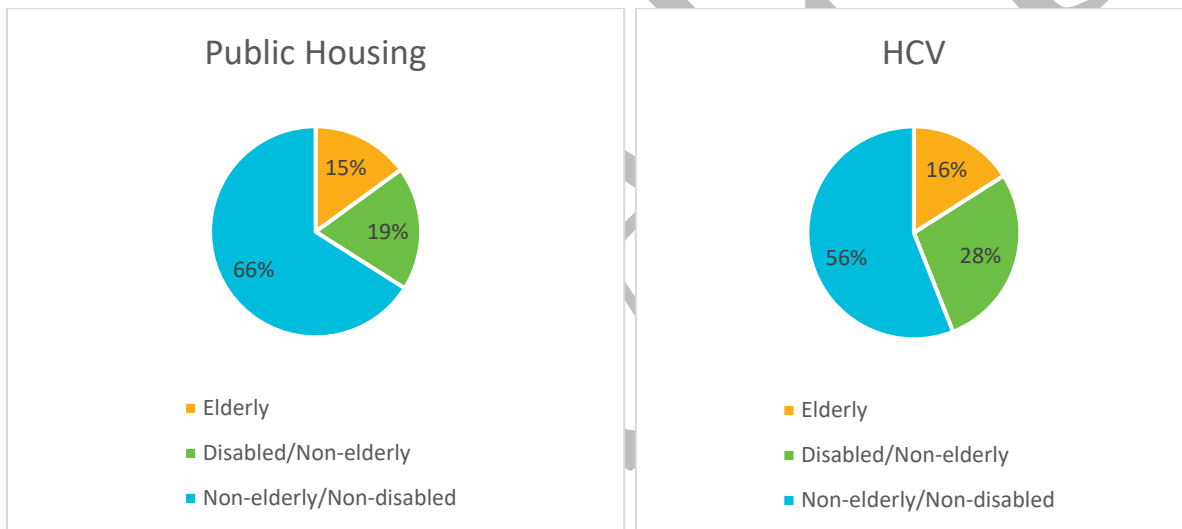
The FWHA has approximately 15 members on its Resident Advisory Board (RAB) that meet quarterly. In light of COVID-19, meeting with the residents, community, and stakeholders occurs via video conferencing. The FWHA held two resident meetings to discuss the MTW plan and will continue to meet with interested residents and stakeholders throughout the demonstration. The FWHA will continue to discuss MTW initiatives with its FSS Program Coordinating Committee Members, the Continuum of Care members and the Department of Social Services via our Housing Opportunities, Tactics, and Strategies (HOTS) quarterly meetings. During the HOTS meetings, the FWHA meets with all of our community partners, consisting of over 50 different agencies. Discussions include any issues facing the low-income clientele in the Fort Wayne community that we serve collectively. Discussion topics cover a broad range of essential items, including child care, transportation, education, mental health, and job creation.

i. Affirmative Outreach and Engagement efforts

The FWHA regularly analyzes its resident population through the use of HUD generated PIC ad-hoc reports and internal Yardi system data reports to address the needs of the community. In light of the recent pandemic, the FWHA has maintained a user-friendly website to disseminate critical housing and COVID-19 information for housing authority residents and participants. The FWHA has a Section 504 coordinator who ensures the communication efforts of the FWHA is accessible to all families. The FWHA has a partnership with The League, an agency that provides communication services (i.e., sign language) for LEP families and hearing and visually impaired persons. The FWHA also utilizes Relay Indiana, a free service that provides full telecommunications accessibility to people who are deaf, hard of hearing, or speech impaired.

C. PHA Operating and Inventory Information

The FWHA manages approximately 750 public housing units and has 3,099 HCV's under its Annual Contributions Contract (ACC). The demographics of the FWHA are as follows:



As the FWHA has applied for the mobility demonstration program and MTW flexibilities, we expect that the number of families with children being served in the jurisdiction will increase.

i. FWHA Major Plans for Housing Stock

The FWHA has 50 scattered-site housing units that they will dispose of via a Section 18 Demolition/Disposition application and plans to offer homeownership opportunities to Fort Wayne first-time homebuyers with a preference going to currently assisted families. Any unsold units would be transferred to the FWHA non-profit partner, Housing Opportunities of Fort Wayne (HOFW) to provide rental housing for low-income families. The FWHA would consider utilizing some of its MTW funding flexibilities to provide homeownership counseling and assist with any rehabilitation needed for the homes.

ii. Challenges FWHA faces in leasing or occupancy or special needs populations

Families with children traditionally face discrimination in locating units in low poverty areas and a lack of available units. The Fort Wayne Housing Authority hopes that through landlord incentives, mobility initiatives and less frequent recertifications, the families can overcome some of these barriers to finding adequate housing.

iii. Experience and Demonstrated Innovation and Creativity with Other Grants and HUD Programs

The FWHA has a long-term goal of ensuring safe and economically viable communities for its residents. Some of the innovative programs implemented at the FWHA include:

- The FWHA established a Career Development Office (also known as the Family Self-Sufficiency program) that hosts virtual training and services for FSS families. The grant-funded Career Development Specialists serve over 342 families enrolled in the FSS program who are provided with financial coaching, credit repair support and job search assistance.
- The FWHA partners with T-Mobile through the Connect Home Program to provide computer tablets to residents who do not have laptop computers or Wi-Fi access.
- The FWHA established the Ready to Rent program developed to assist homeless individuals and families ready to move from an approved shelter into a rental unit and willing to adhere to a housing Stability Plan for 12 months. The FWHA oversees the client's daily programs and helps them transition from the homeless shelter to stable housing by way of providing case management services.
- The FWHA is a founding member of the newly formed National Housing and Education Task Force. The FWHA has resources that ensure every child living in our communities can participate in educational enrichment programs designed to strengthen their reading skills. The FWHA is committed to ensuring kids are reading at grade level. The FWHA established Book Rich Environments (BRE) or little free libraries (refurbished newspaper stands) at each development and the main FWHA office to ensure children have access to books.
- The FWHA established HCV incentive payment standards in low-poverty areas
- Through the use of CARE Act funds, FWHA established landlord "bonus" incentives of up to \$500 for landlords who sign a new HCV lease and HAP Contract
- The FWHA established a landlord liaison position to recruit and retain landlords, particularly those in low-poverty areas, and to ensure our real-estate partners and owners are orientated to the HCV program and receive prompt responses to program questions.

Additionally, the FWHA has demonstrated capacity implementing special purpose vouchers allocated by HUD. The FWHA administers the following special programs:

- **Veteran's Affairs Supportive Housing (VASH)** – FWHA has a dedicated staff person who meets with the VA regularly; The VA has a representative on the Homeless Council to assist in making referrals of homeless veterans in need
- **Mainstream Vouchers** – FWHA has MOU's with the Department of Child and Family Services, the Fort Wayne Continuum of Care (COC), and other service providers to serve approximately 96 disabled families.
- **Non-Elderly Disabled Vouchers (NED)** – The FWHA administers an allocation of NED vouchers and partners with the same stakeholders in the Mainstream program.
- **Family Unification Program (FUP)** – The FWHA administers the FUP program.
- **HCV Homeownership Program** – FWHA has approximately 11 homeowners and has partnerships with banks and financial institutions in the Fort Wayne area who provide financial management training and are Dave Ramsey certified.
- **Project-Based Vouchers (PBV)** – The FWHA is the contract administrator for three PBV developments with over 133 units; one development, Rivers Edge, is located in a low-poverty opportunity area.
- **Rental Assistance Demonstration (RAD) PBV/Low-Income Housing Tax Credit (LIHTC) Program** – The FWHA converted 99 public housing units to long-term project-based assistance through the RADPBV program coupled with LIHTC. The property, McCormick Place, closed in August 2020.

D. Plan for FWHA MTW Program

The FWHA would seek to implement the safe harbor waivers as listed below:

- **MTW Test Rent #2 – Stepped Rent** - The FWHA believes the policy will encourage self-sufficiency and have improved economic outcomes for working, non-elderly, non-disabled families.
- **Alternative/Streamlined Utility Allowance** – The FWHA will create a streamlined utility allowance in PH and HCV to reduce administrative burdens and monetary errors in rent calculations.
- **Initial Rent Burden Waiver (HCV only)** – The FWHA will waive the maximum family share at initial occupancy of 40% of the family's income to encourage moves to higher opportunity areas and increase housing choice.
- **Alternative Reexamination Schedule for Households** – The FWHA will establish a triennial recertification schedule for elderly and disabled families to streamline the administrative burden for families receiving a fixed income source, thereby reducing administrative costs.

- **Self-certification of Assets** – The FWHA will allow the self-certification of assets at the time of recertification to ease the administrative burden of calculations for the agency.
- **Landlord Leasing Incentives** – The FWHA will continue pursuing landlord incentives to encourage greater participation in the HCV program (especially in low poverty census tracts) by landlords in the community for greater housing choice for families.
- **Family Self Sufficiency Program with MTW Flexibility** – The FWHA would design an FSS program that will encourage self-sufficiency but utilize an escrow calculation that aligns with the FWHA rent reform policies.
- **Acquisition Without Prior HUD Approval** – The FWHA would implement this waiver to enable flexibility around the timing of HUD’s administrative approval when outside sources of financing are tied to strict funding or leasing deadlines.
- **Housing Development Programs** – The FWHA would seek to utilize MTW funding flexibility to acquire, renovate or build affordable units for low-income families to increase the availability of housing in the Fort Wayne community.

i. Proposed Use of MTW Funds

The FWHA is formally requesting to use public housing and HCV funds flexibly in the MTW demonstration program.

1. Proposed Use of MTW fund flexibility

Some of the ways the FWHA intends to use funds flexibly across the traditional Section 8 and Section 9 programs include using the MTW funds to further services such as homeownership counseling and career development for both PH and HCV residents. Additionally, MTW flexibility would be used to provide landlord incentives and further the development activities in the Fort Wayne community, particularly with the recapitalization of public housing units.

E. Evidence of Significant Partnerships

The FWHA has partnerships with over 58 local businesses and social service agencies who provide, on average, around \$803,000 in in-kind supportive services each year which provide a variety of supportive services including but not limited to, child care, transportation, education and job training. Additionally, the FWHA has a robust and fully functioning Family Self-Sufficiency (FSS) Program who will help link residents with services and provide feedback and input on the MTW initiatives. Our FSS Program Coordinating Committee members include:

- **Work One** – Component of Northeast Indiana Works that provides skills training and job placement
- **Brightpoint** – Administers the Energy Assistance Program (EAP)
- **Indiana Manpower Placement and Comprehensive Training (IMPACT)** – Provides employment and training services for families receiving welfare assistance

- **Fort Wayne Community Schools** – Provides adult learning and educational courses
- **Citilink** – Provides transportation assistance and bus passes
- **Ivy Tech Community College** – College level and technical training courses
- **Walmart** – Business partner and employer

To further financial and economic independence, the FWHA has partnerships with several financial institutions to assist with credit counseling, budgeting, mortgage readiness, and financial planning. The FWHA has current Memoranda of Understanding (MOU's) with the following agencies:

- Indiana Department of Child and Family Services
- Fort Wayne Area Planning Council on Homelessness (Continuum of Care)
- Mental Health America of Northeast Indiana

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2. RENT REFORM

A. Alternative Rent Policy Selection and Rationale

In 2019, the FWHA conducted an impact analysis of the proposed rent reform policies outlined in PIH Notice 2019-04. The FWHA determined that MTW Test Policy #2 – Stepped Rent would have the least impact on the families and allow the FWHA substantial cost savings. Under the Stepped Rent policy, the FWHA determined that more families could be served due to HAP savings. Additionally, the Stepped Rent policy was less administratively burdensome for families and staff as it provided for triennial recertifications and did not include asset calculations and other deductions. The FWHA believes that less frequent recertifications will lead to increased income and greater self-sufficiency.

B. Description of Stepped Rent Policy

The Fort Wayne Housing Authority has selected MTW Test Rent #2 – Stepped Rent to test over a six-year period. Under the MTW Test Rent #2 – Stepped Rent policy, the tenant rent in Public Housing (PH) or the participant contribution in the Housing Choice Voucher (HCV) program are increased annually by a fixed amount. The PHA will choose the size of the annual Stepped Rent increase, but it may not be less than 2% of the Fair Market Rent (FMR) or exceed 4% of the FMR (adjusted for unit size). Each year, the PHA may (but is not required to) review and adjust the annual Stepped Rent increase. Each household's year one rent will be set at 30% of their gross income or the FWHA's minimum rent of \$50. After the first year, each household's rent will increase by the annual Stepped Rent increase, regardless of their income.

Table 1: Stepped Rent Example of Initial Tenant Rent

	Family 1	Family 2	Family 3
Annual Gross Income x 30% divided by 12 months	\$32,000 x 30% = \$9,600 ÷ 12 = \$800	\$14,000 x 30% = \$4,200 ÷ 12 = \$350	\$2,400 x 30% = \$720 ÷ 12 = \$60
Minus Utility Allowance	-\$125	-\$95	-\$0
Tenant Rent*	\$675	\$255	\$60

*In the HCV program, if the family rents a unit with a gross rent that is higher than the Payment Standard, the family must pay the difference and this amount is added to the tenant rent.

Under the MTW Test Rent #2 – *Stepped Rent*, the initial rent is based on annual gross income and will be determined using the prior year's gross income. Under the Stepped Rent policy, the FWHA will use a definition of income that differs from the existing rent rules. FWHA will not apply the allowances or deductions typically used to calculate “adjusted income.” Instead, income will be defined as gross income. Under the existing rent calculation rules, income is defined as the amount that the family expects to receive in the next 12 months. This is sometimes referred to as “current/anticipated income.” In *Stepped Rents*, the triennial income reexaminations will measure income based on the previous year’s gross income. This should improve the accuracy of income reporting and better represent a household’s long-term earning potential. If selected for the MTW demonstration, HUD will work with FWHA to determine how best to measure gross income over the prior year.

i. Estimate of Enrollment Period

Under the *Stepped Rent* policy, it is expected that HUD will select PHA’s on or around March 2021. Once selected, HUD anticipates the enrollment period to begin around March 2022.

During the enrollment period, any new admissions who qualify as eligible households are expected to undergo random assignments and participate in the study. After the enrollment period is concluded, the PHA may choose whether newly admitted non-elderly, non- disabled households will be subject to the alternative rent policy or the regular rent rules (i.e., Brooke rents).

Households randomly assigned to the new rent rules or existing rent rules must remain in that group for six years (unless they leave assistance, port out to another jurisdiction, or are exempted from the study for other reasons such as a disability).

ii. Households Eligible and Ineligible for Stepped Rent Policy

The MTW demonstration goal is to enroll families where the head of household is working, looking for work or going to school to improve their economic circumstances. Eligible households will include residents and participants in both the public housing and HCV programs, including existing, currently assisted households and new households admitted during the alternative rent enrollment period. Elderly and disabled households will be excluded. Households with special-purpose vouchers and homeownership vouchers will be excluded. Households paying a public housing flat rent or ceiling rent will be excluded. Households already participating in the Family Self- Sufficiency (FSS) program will be excluded. HUD and the independent research team will consider other exclusions in partnership with selected PHAs.

iii. Benefits of the Stepped Rent Policy

Requiring the family to attend fewer recertifications (once every three years) will allow the family greater autonomy. While the household income will be reviewed every three years during the demonstration, the income will not be used to determine rent but instead to check-in with the family

and measure the *Stepped Rent* policy. In this Stepped Rent policy, the family’s rent will increase annually that the family can plan for and does not require annual income reviews.

iv. Description of the Stepped Rent Increases

The *Stepped Rent* policy will increase tenant rents annually by an amount unrelated to each household’s income. The annual Stepped Rent increase will be a specific dollar amount, by unit size. The *Stepped Rent* will be established by the PHA and can be set anywhere between 2% and 4% of the Fair Market Rent. **The FWHA intends to increase the Stepped Rent by 2% each year and review and adjust the Stepped Rent increase each year when HUD publishes new Fair Market Rents during the six-year study period. Therefore, the Stepped Rent increases may change if the FMRs change.**

Table 2: Description of the Stepped Rent Increases

The table below shows the Fair Market Rents for the FWHA and the minimum and maximum annual rent increase allowed under this *Stepped Rent* policy.

Fort Wayne Housing Authority	Efficiency	One Bedroom	Two Bedroom	Three Bedroom	Four Bedroom	Five Bedroom
*Fair Market Rent (2021)	\$526	\$632	\$784	\$1,003	\$1,108	\$1,274
Minimum Rent Increase (2%)	\$11	\$13	\$16	\$20	\$22	\$25
Maximum Rent Increase (4%)	(\$21)	(\$25)	(\$31)	(\$40)	(\$44)	(\$51)
*Rent increases may change as the FMRs change, but this chart represents a general indication of the minimum and maximum annual rent increase that the FWHA might implement.						

Table 3: Description of the Stepped Rent Increases

Using the example listed above in Table 1, the annual rent increases for families would be as described here:

	Family 1 (One Bedroom)	Family 2 (Two Bedroom)	Family 3 (Three Bedroom)
Year 1 – Initial Tenant Rent	\$675	\$255	\$60
Year 2 – Stepped Rent Increase	\$688 (\$675 + \$13)	\$271 (\$255 + \$16)	\$80 (\$60 + \$20)
*Year 3 – Stepped Rent Increase	\$701 (\$688 + \$13)	\$287 (\$271 + \$16)	\$100 (\$80 + \$20)
<i>*Stepped Rent increase may change based on changes to the HUD published Fair Market Rent.</i>			

v. Hardship Rent Policies

A household will receive a hardship if their rent burden exceeds 40% of their current/anticipated total annual gross income or other circumstances, as determined by the FWHA. The hardship rent will equal 30% of the households' current/anticipated total annual gross income. **The FWHA proposes that the hardship rent will last for up to 12 months and can be renewed as needed.**

vi. Summary of Stepped Rent Provisions

While this is a demonstration program and subject to changes, an overview of the Stepped Rent requirements and FWHA's proposed policies is as follows:

- **Utility Allowance** – The alternative rent policy includes a utility allowance. The household will receive a utility reimbursement if applicable. **The FWHA plans to utilize a simplified utility allowance.**
- **Voucher Rents** – An HCV household cannot pay more than the actual gross rent for their unit. If the gross rent is above the payment standard, the household is responsible for any amount over the payment standard.
- **Initial Rent** – Each household will start out paying rent equal to 30% of their total annual gross income in the prior year or a minimum rent of \$50 (whichever is larger).
- **Annual Stepped Rent Increase** – The FWHA will establish an annual Stepped Rent increase by unit size. After year 1, each household's rent will increase by the FWHA-established amount (with exceptions for hardships and triennial income reexaminations)

- **The FWHA intends to increase the rents at the minimum amount of 2% each year. See Table 2 for estimates of Stepped Rent increases.**
- **Triennial Income reexaminations** – Families will be required to be recertified every three years. At the triennial income reexamination, the PHA will document household income and any changes in the household composition. However, the triennial income reexamination will not affect the household's rent.

C. Information Technology Plan

The FWHA uses Yardi Voyager as its internal system of record and contracts with a third-party vendor to manage its information technology department. Some of the country's largest MTW agencies utilize Yardi, such as the Chicago Housing Authority, and the system can be easily modified to integrate MTW initiatives and the MTW HUD-50058. Yardi Voyager is a web-based, fully integrated end-to-end platform with mobile access for larger portfolios to manage operations, execute leasing, run analytics and provide innovative resident and tenant services. The FWHA recently implemented a landlord portal “Rent Café” to give owners immediate real-time access to data related to their payments, inspections, and tenants. Additionally, the FWHA is in the process of converting its paper tenant files to electronic records.

3. APPENDICES

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A. Appendix 1: Moving to Work Certification of Compliance - TBD

B. Appendix 2: Public Process Documentation - TBD

- i. Evidence that public housing residents and HCV participants were notified of the PHA's intention to participate in the MTW Demonstration program
- ii. Evidence that two resident meetings were held
- iii. The public notice advertising the public hearing
- iv. Evidence that the public hearing was held (items could include minutes, sign-in sheet, etc.)
- v. A resolution signed by the Board of Commissioners adopting the MTW application

C. Appendix 3: Required Standard Forms - TBD

- i. Certification of Consistency with the Consolidated Plan (form HUD-2991)
- ii. Certification of Payments (form HUD-50071)
- iii. Disclosure of Lobbying Activities (SF-LLL) if applicable

D. Appendix 4: Other Supporting Documentation - TBD

- i. Letters of Support
- ii. Community Meeting Materials
- iii. Resumes