

MOVING TO WORK APPLICATION AND PLAN NORWALK HOUSING AUTHORITY

Enhancing Housing, Engaging Minds, Enriching Lives



Enhancing Housing, Engaging Minds,
Enriching Lives.

TABLE OF CONTENTS

Part I: Moving to Work Plan and Landlord Incentive Activities	1
A. MTW Plan	1
1. Vision for Norwalk Housing Authority’s Moving to Work Program	1
2. Plan for Future Community/Resident Engagement	4
3. PHA Operating and Inventory Information	5
4. Plan for NHA Local MTW Program	8
5. Proposed Use of MTW Funds	10
6. Evidence of Significant Partnerships	11
B. Landlord Incentive Activities Information	12
1. Landlord Needs Assessment	12
2. MTW Cohort 4 Activities	13
3. Other Landlord Incentives and Initiatives	15
Part II: Appendices	1
Appendix 1: Certifications	1
Attachment 1.1: Moving to Work Certifications of Compliance	2
Attachment 1.2: Commitment to Participate in the Fourth Cohort Evaluation	6
Appendix 2: Public Process Documentation	1
Attachment 2.1: Notice to HCV Owners of the NHA’s Intention to Participate in the MTW Program / Notice of Owner Meeting	4
Attachment 2.2: Notices to Public Housing Residents / HCV Participants of the NHA’s Intention to Participate in the MTW Program and Notice of Resident Meetings	9
Attachment 2.3: Resident Meeting Specifics	13
Attachment 2.4: Notice of Public Hearing on NHA’s MTW Plan and Application	16
Attachment 2.5: NHA Public Hearing Minutes	19
Attachment 2.6: NHA Board Resolution Approving the NHA’s Application for the MTW Demonstration Program	20
Appendix 3: Required Standard Forms	1
Attachment 3.1: Certification of Consistency with the Consolidated Plan (Form HUD-2991)	2
Attachment 3.2: Certification of Payments (form HUD-50071)	4
Attachment 3.3: Disclosure of Lobbying Activities (SF-LLL)	6
Appendix 4: Other Supporting Documentation	1
Attachment 4.1: Letter of Support, Office of the Mayor, City of Norwalk	2
Attachment 4.2: NHA MTW Plan and Application Timeline	3
Attachment 4.3: NHA MTW Plan and Application Resident Presentation Slides	5

PART I: MOVING TO WORK PLAN AND LANDLORD INCENTIVE ACTIVITIES

A. MTW Plan

1. Vision for Norwalk Housing Authority's Moving to Work Program

The Moving To Work (MTW) program was established in 1996. HUD is expanding MTW by adding an additional 100 MTW Public Housing Agencies (PHAs) over seven years. HUD has invited PHAs to apply for the MTW Co-hort #4 – Landlord Initiatives demonstration. The NHA is submitting a formal application to participate in the MTW Expansion under Co-hort #4.

i. NHA's Unique Vision

The Norwalk Housing Authority is an innovative, progressive, high performing housing authority whose mission is to build, maintain, and preserve safe, affordable housing through well managed, mixed income properties that strengthen our community. The flexibilities allowed through the Moving-to-Work Program will support NHA's vision of empowering residents to achieve self-sufficiency by increasing family housing opportunities, supporting deconcentration of assisted families, encouraging greater landlord participation, promoting landlord retention, and reducing administrative burdens.

The vision of the NHA is aligned with the overall goals of the MTW program:

Cost Savings

The NHA hopes to reduce administrative costs through the ability to establish higher payment standards. Higher payment standards will reduce the number of tenancy requests that are denied due to units being determined as not affordable under regulations. In addition, fewer families will move due to their out-of-pocket rent costs increasing in response to increased rents. NHA will experience savings by the reduced need for reissuing vouchers and leasing paperwork to families. Not only will this reduce administrative costs, but will better allow the NHA to house families in higher opportunity areas.

Self-Sufficiency for Residents

The NHA has a robust Family Self-Sufficiency Program and Homeownership Program, and has experienced great success in implementing its EnVision Center demonstration program, supporting the following four pillars: (1) Economic Empowerment, (2) Educational Advancement, (3) Health and Wellness, and (4) Character and Leadership. The increased ability for families to lease up in areas of low poverty concentration improves opportunities for education, job training, employment, medical treatment, and child care. These will support the four pillars that directly promote family self-sufficiency. Increased payment standards will decrease family shares, which will increase income families have available for needs other than housing costs.

Housing Choice

The ability for NHA to raise its payment standards will support NHA's existing efforts to encourage families with and without children to move to opportunity areas throughout the Norwalk community. All landlord initiatives were selected with the intent to promote owner participation across the entire Norwalk community, which will increase housing choices. All MTW cohort 4 actions selected focus on helping families successfully move into homeownership and achieve housing stability in low poverty areas.

Why MTW?

The City of Norwalk is a microcosm of Fairfield County, comprised of dramatic disparities between lower opportunity and higher opportunity neighborhoods. NHA has a long history of policy initiatives designed to help our Section 8 families move into these higher opportunity communities. Although we have demonstrated some success, we have always believed that administrative limitations, including FMR/payment standard ceilings and the ability to entice landlords into the Section 8 program in the higher opportunity communities, has greatly reduced our ability to expand this program. While currently our Section 8 families are able to lease up, they are not always able to lease up in higher opportunity neighborhoods. The administrative flexibilities provided with the MTW Cohort 4 are precisely the tactics we can utilize to implement our theories. The MTW Cohort 4 initiatives as shown in Section 4 have the potential to greatly expand the number of Norwalk Section 8 families that can successfully move into higher opportunity areas.

ii. Skills and Experience of NHA Personnel

The Norwalk Housing Authority has a highly experienced and skilled workforce under the leadership of the Executive Director, Adam Bovilsky. However, realizing some initiatives require expert skill sets not readily available within the agency, NHA maintains a diverse, capable pool of private-sector experts and partners to fill any skill gaps needed to ensure the success of the NHA programs and initiatives. In addition, NHA has capable and well-trained staff to handle Section 8 and public housing screenings, inspections and recertifications. Staff are regularly trained on regulatory and fair housing issues necessary to their work and have many years of experience with the programs.

Adam Bovilsky, Executive Director – Adam is a visionary, advocate and innovator. He has spent the past 15 years developing solutions to improve families' quality of life in underserved communities. When not leading the Norwalk Housing Authority, he serves as a board member of Norwalk ACTS and Opening Doors of Fairfield County.

Krasimira Carlucci, Deputy Director – With over 11 years of housing experience, Krasimira oversees all PHA housing operations, including the HCV and public housing programs. Having previously served as the Director of Operations, she has a wealth of experience in finding creative and innovative approaches to program delivery and meeting community needs.

Anna T. Keegan, Director of Housing Operations – Anna oversees the work of HCV inspectors and occupancy specialists, public housing occupancy specialists, and operations of NHA's ROSS and FSS Programs and Envision Center. An attorney with 10 years of experience in housing, ADA and civil rights law, Anna previously served as the City of Norwalk Civil Rights & Fair Rent Investigator and then as Director of the City of Norwalk Human Relations and Fair Rent Department. From this work, Anna became familiar with the Norwalk rental market and local resources available to assist residents.

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

The Norwalk Housing Authority certifies that it will administer all programs and actions 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 all programs or proposed programs, identifying any impediments to fair housing choice within those programs, 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 NHA's involvement and by maintaining records reflecting these analyses and actions.

2. Plan for Future Community/Resident Engagement

The NHA has approximately 12 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 NHA held one virtual landlord meeting (July 12, 2021 at 6:00 pm) and two virtual resident meetings (August 18, 2021 and August 26, 2021 at 6:00 pm) as well as a virtual public meeting (September 16, 2021 at 6:00 pm) to discuss the MTW plan and will continue to meet with interested residents and community partners throughout the demonstration. Translators were and continue to be available to residents as needed. The NHA will continue to discuss MTW initiatives in regular community meetings, including with landlords at annual landlord meeting(s). Discussions include addressing issues facing the low-income clientele in the Norwalk community that we serve collectively, including the ability for families to locate units in a challenging market, but especially in low poverty/minority concentration areas.

3. PHA Operating and Inventory Information

i. Current Inventory

The NHA manages approximately 806 public housing units and has 1,046 HCVs under its Annual Contributions Contract (ACC). NHA experiences little difficulty in leasing public housing units. In the HCV program, families do experience difficulties locating units in higher opportunity areas. In the HCV program, unit types under assisted lease are as follows:

- 35.5% Semi-detached
- 29.7% Row House
- 17.5% High Rise
- 9.6% Low Rise
- 7.5% Single family dwellings

NHA's public housing stock is comprised of a mixture of low-rise, high-rise and townhouses.

Household Demographics					
	% Female/Male	% Families with Children	Disabled/non- disabled	White/Afro- American/Asian	Hispanic/non- Hispanic
HCV	85%/15%	44%	30%/70%	49%/50%/<1%	33%/67%
PH	75%/25%	35%	18%/82%	53%/46%/<1%	42%/58%

ii. Anticipated Changes to Demographics of Households Served

Although the NHA does not expect a significant change to demographics of households served in terms of age, disabilities, ethnicity, etc., the opportunities made available to all families will change considerably. Families will be better able to lease in areas of higher opportunities. In addition, the MTW initiatives will provide families with better educational and employment opportunities, improved access to child care, and public transportation. Adults will have access to better employment opportunities. Seniors and disabled individuals will have access to better medical care options and services.

iii. NHA Major Plans for Housing Stock

Soundview Landing is a 273 unit, mixed-income development with 136 replacement public housing units. Constructed in phases, replacement units include designated supportive housing units, project-based voucher units, LIHTC, and market rate units. Soundview Landing does increase housing opportunities for voucher holders. In addition, under this cohort, voucher holders will be more likely to afford leasing single-family dwellings.

iv. Challenges NHA Faces in Occupying Public Housing Units, Leasing HCV Units, and/or Serving the Special Needs of Specific Populations

Low-income families with children traditionally face challenges in locating units in low poverty areas. The NHA hopes that through the combination of offered landlord incentives, families can overcome some of these barriers to finding adequate housing despite the rapidly increasing housing costs in the community.

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

The NHA has a long-term goal of ensuring safe and economically viable communities for its residents, using grants and HUD programs to create innovative solutions in addressing family needs and obstacles.

- NHA continues its long-standing Norwalk Housing Foundation (NHF) college scholarship program for NHA students.
- Due to NHA's having been granted status by HUD as an EnVision Center, NHA's HUD-assisted families now have access to support services that can help them achieve self-sufficiency.
- Partially funded through grants, NHA's pioneering Learning Centers have long been and continue to be committed to providing NHA students with academic support, enrichment programs, school and career guidance, character building opportunities, and educational field trips.
- Utilizing state funding, NHA's commodities program works to improve the health of low-income elderly persons 60 years of age or older by supplementing their diets with nutritious USDA foods. From April 1, 2020 through March 31, 2021, 910 boxes of food (30,030 pounds) were distributed to Public Housing and Housing Choice Voucher residents.
- NHA also utilized a one-time Housing Authority Small Improvement Program (HASIP) grant (sponsored by Connecticut Housing Finance Authority) to provide families with PPE, household necessities, and other essentials during the COVID-19 quarantine.

Additionally, the NHA has demonstrated capacity implementing special purpose vouchers allocated by HUD, administering the following special programs:

- **Veteran’s Affairs Supportive Housing (VASH)** – NHA has been awarded 23 vouchers to house homeless veterans and has a dedicated staff person who meets with Veteran Administration staff regularly.
- **Mainstream Vouchers** – NHA has Memorandums of Understanding (MOUs) with the Family and Children’s Agency, the Norwalk Continuum of Care (CoC), and other service providers to serve 100 disabled families.
- **Family Unification Program (FUP)** – The NHA administers the FUP program with the allocated 7 vouchers fully utilized.
- **Congregate Housing** – This state program assists the elderly and frail, and provides housing and special services such as meals and medical support.
- **FSS and ROSS** – As of March 31, 2021, NHA’s self-sufficiency programs have served 158 self-sufficiency participants in the public housing and HCV programs: 105 FSS participants and 53 ROSS participants this year. Through the FSS and ROSS programs, NHA has introduced:
 - Job Training Referral/Employment Referral and Job Fairs;
 - Health Career Academy;
 - One-on-One Credit Counseling;
 - One-on-One Homeownership Counseling;
 - HUD’s First-Time Home Buying Workshop;
 - Health and Wellness Workshops;
 - Health Fairs;
 - Financial Workshops; and
 - Naturalization and Citizenship Information Sessions.

NHA has utilized HCV program flexibilities to maximize family housing opportunities:

- **HCV Homeownership Program** – NHA has 15 homeowners, having entered into successful partnerships with banks and financial institutions in the Norwalk area who provide mortgages and financial management training.
- **Project-Based Vouchers (PBV)** – The NHA is the contract administrator for 174 project-based voucher units across multiple developments; all located in low-poverty opportunity area(s).
- **Tiered Payment Standards** – NHA implemented tiered payment standards in the HCV program to increase opportunities for families to lease in higher cost/opportunity areas.

4. Plan for NHA Local MTW Program

NHA is seeking to implement landlord incentive activities that address core MTW goals:

Cost Effectiveness

The NHA hopes to reduce annual administrative costs through the ability to establish higher payment standards. Higher payment standards as allowed under the MTW Landlord cohort #4 option 2.b. *Payment Standards – Fair Market Rents (FMR)* will reduce the number of tenancy requests that are denied, which in turn reduces the need for NHA to reissue vouchers and leasing paperwork to families.

Self-Sufficiency for Residents

The NHA has for years focused on four pillars chosen to support family self-sufficiency: (1) Economic Empowerment, (2) Educational Advancement, (3) Health and Wellness, and (4) Character and Leadership. The increased ability for families to lease up in higher opportunity areas through the NHA's ability to establish payment standards at up to 120% of FMR under MTW Landlord cohort #4 option 2.b. *Payment Standards – Fair Market Rents (FMR)* improves opportunities for education, job training, employment, medical treatment, and child care. Better access to transportation, job training, employment and child care will increase the family's ability to maximize benefits of the FSS program, and will assist in family members being able to acquire and retain higher paying employment positions. Increased access to educational opportunities will have long term impacts on children, which will help break the cycle of poverty.

Housing Choice

The ability for NHA to raise its payment standards under MTW Landlord cohort #4 option 2.b. *Payment Standards – Fair Market Rents (FMR)* will support NHA's efforts to encourage families with and without children to move to opportunity areas throughout the Norwalk community.

The other selected landlord initiatives chosen under MTW Landlord cohort #4 (4.a. *Vacancy Loss payments*, and 4.b. *Damage claim payments*) each carry additional benefits supporting family choice in units. Both options support and promote landlord participation in all areas of the community. Both initiatives encourage owners to complete unit repairs and upgrades, resulting in overall improved housing stock. In owner meetings, owners shared that NHA's implementation of the vacancy loss payment initiative would also result in owners being likely to 'hold' a unit for a voucher holder then to lease immediately to a non-voucher holder.

All MTW cohort 4 actions selected focus on helping families successfully move into homeownership and achieve housing stability in low poverty areas.

The three specific initiatives to be implemented by NHA are:

- **2.b. Payment Standards – Fair Market Rents (FMR):** The ability for the PHA to establish payment standards between 80% and 120% of the HUD-published FMR.
- **4.a. Vacancy Loss:** The ability for the PHA to pay landlords up to one-month contract rent as reimbursement for time the unit spends vacant between HCV participants.
- **4.b. Damage Claims:** The ability for the PHA to reimburse landlords for tenant-caused damages (minus security deposit) up to two months contract rent after tenancy.

5. Proposed Use of MTW Funds

The NHA is formally requesting flexible use of HCV funds in the MTW demonstration program.

i. Proposed Use of MTW fund flexibility

The NHA intends to use HCV funds flexibly across the traditional Section 8 through:

- Under **Landlord cohort #4 2.b. Payment Standards – Fair Market Rents (FMR) Initiative:** The ability for the PHA to pay Housing Assistance Payments (HAP) based on payment standards established between 80% and 120% of the HUD-published FMR (versus between 90% and 110% per regulation).
- Under **Landlord cohort #4 4.a. Vacancy Loss Initiative:** The ability for the PHA to utilize HCV funds to pay landlords up to one-month contract rent as reimbursement for time the unit spends vacant between HCV participants (not currently authorized in regulations).
- Under **Landlord cohort #4 4.b. Damage Claims Initiative:** The ability for the PHA to utilize HCV funds to reimburse landlords for tenant-caused damages (minus security deposit) for up to two months contract rent after tenancy.

6. Evidence of Significant Partnerships

NHA's many community partnerships were tested by COVID-19 and the related quarantine. Outcomes of working with these partners proved the strength of the relationships. NHA coordinated efforts between Senior Services, the City of Norwalk, Community Health Centers, and Food Banks to provide food, masks, information, and services to quarantined individuals and families in the community. Services included well-being checks and free COVID-19 testing.

NHA collaborates with the Norwalk Early Childhood Council to help NHA families with kindergarten registration. Partners include:

- Norwalk ACTS
- Connecticut Afterschool Network
- The National Afterschool Association
- Norwalk Public Schools
- Silvermine Arts Center
- Stepping Stones Museum for Children
- Norwalk Office of Early Childhood
- Norwalk Health Department
- Literacy HOW, Inc.
- H.E.L.P., Inc.
- Velo-CT
- Norwalk Reads

NHA Manages Properties for Mutual Housing through NHA's Sound Communities. Sound Communities is a developer and manager of mixed income housing; its mission is to expand and preserve mixed communities.

NHA continues to identify new local partners in order to partner and collaborate with more local social service agencies, and continues to deepen the existing partnership with the City of Norwalk and the Board of Education in order to expand upon the existing services and offerings available to families.

B. Landlord Incentive Activities Information

1. Landlord Needs Assessment

Norwalk is a medium sized community, located near New York City. Significant development of large housing complexes has increased rental costs in areas that were traditionally more affordable. Due to COVID, New York City residents have flocked to Norwalk seeking rental properties, resulting in skyrocketing rents.

Landlords and families cited high rents in the community as a significant barrier to HCV holders seeking to lease in Norwalk. Some landlords also hold the perception that Section 8 tenants are more likely to leave with unit damages. Landlords also state that timing the move-in of voucher holders can be challenging, given the actions that must be completed by NHA before the assisted tenancy may be approved.

2. MTW Cohort 4 Activities

The Norwalk Housing Authority has selected the following MTW activities under Cohort 4:

- **2.b. Payment Standards – Fair Market Rents (FMR):**

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's share of the rent. 24 CFR 982.305(a)(5) states that at initial occupancy the PHA may not approve the tenancy if it would require the family share to exceed 40 percent of the family's monthly adjusted income.

24 CFR 982.503(b) requires that the PHA establish a payment standard within a "basic range" established by HUD – between 90 and 110 percent of the published FMR for each unit size.

The ability for the NHA to establish payment standards between 80% and 120% of the FMR will support PHA leasing efforts as NHA will be able to establish higher payment standards in higher rent areas, making a broader range of units available to voucher holders. This will address landlord and homeless advocate concerns regarding rents being too high for the PHA to approve (per 24 CFR 982.305(a)(5)), and will provide families with the ability to lease units in areas outside of high poverty/minority concentration. This should result in improved economic outcomes for low-income families.

- **4.a. Vacancy Loss:**

The ability for NHA to pay landlords up to one-month contract rent as reimbursement for time the unit spends vacant between HCV participants not only promotes and supports landlord participation in all areas of the community, but encourages owners to complete unit repairs and upgrades, resulting in overall improved housing stock. In addition, owners are more likely to 'hold' a unit for a voucher holder pending the HQS inspection and/or other necessary actions than to lease immediately to a non-voucher holder.

- **4.b. Damage Claims:**

The ability for NHA to reimburse landlords for tenant-caused damages (minus security deposit) up to two months contract rent relieves stated owner concerns and perceptions regarding unit condition after tenancy. Although the fears that voucher holders are more likely to damage units is usually groundless, this policy promotes participation by new landlords by giving a concrete way to alleviate concerns of property damage while allowing owners to experience first-hand the positive experience of leasing to assisted low-income families. This action encourages moves to higher opportunity areas and increases housing choice.

3. Other Landlord Incentives and Initiatives

Although the NHA is not requesting waivers under this initiative, the NHA has other current landlord incentives and initiatives in place that encourage participation by new owners and support existing owners. These include but are not limited to:

- In 2007, the NHA enacted a two-tiered payment standard for the Housing Choice Voucher program. The two-tiered approach in payment standards supports higher rent payments in low-poverty census tracts, thus encouraging families to locate units in higher opportunity neighborhoods.
- The NHA holds yearly landlord meetings in conjunction with the City's Fair Rent and Fair Housing staff to educate landlords on local housing law and the HCV program, and give landlords an opportunity to meet the NHA staff and ask questions about the program
- The NHA Landlord Handbook is available to anyone through NHA's website.
- Additional HCV tools and resources are available to owners on NHA's website, including:
 - FAQs
 - Key forms
 - Link to Gosection8.com, where an owner may list units available for rent
- Landlord Portal: when visiting NHA's website, landlords may link to HMS PAL™ (Payment Access for Landlords). Landlords receiving Housing Assistance Payments (HAP) may look up payment history, turn on email notifications of payments, check for the most recent payment, etc.



PART II: APPENDICES

Appendix 1: Certifications



Attachment 1.1: Moving to Work Certifications of Compliance

Moving to Work Certifications of Compliance

CERTIFICATIONS OF COMPLIANCE

***U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND IND/AN HOUSING***

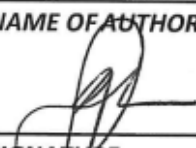
**Certifications of Compliance with HUD and Federal Requirements and Regulations:
Board Resolution to Accompany Application to the Moving to Work Demonstration Program**

Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the application to the Moving to Work (MTW) Demonstration Program for the PHA and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the application and implementation thereof:

- (1) The PHA will adhere to the MTW Operations Notice or successor notice and all requirements therein.
- (2) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure at least 75% of families assisted are very low-income as defined in Section 3(b)(2) of the 1937 Act throughout the PHA's participation in the MTW Demonstration Program.
- (3) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in establishing a reasonable rent policy that is designed to encourage employment and self-sufficiency.
- (4) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to assist substantially the same total number of eligible low-income families as would have been served absent MTW throughout the PHA's participation in the MTW Demonstration Program.
- (5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program throughout the PHA's participation in the MTW Demonstration Program.
- (6) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.
- (7) The PHA published a notice that a hearing would be held, that the application and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the application by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the application and invited public comment.
- (8) The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the application by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the application.

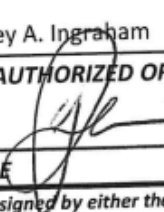
- (9) The PHA certifies that the Board of Commissioners has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (10) The PHA certifies that it will carry out its application in conformity with: Title VI of the Civil Rights Act of 1964 (42 USC 2000d-2000d-4); the Fair Housing Act (42 USC 3601-19); Section 504 of the Rehabilitation Act of 1973 (29 USC 794); Title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.); all regulations implementing these authorities; other applicable Federal, State, and local civil rights laws; and that it will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)).
- (11) The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2) and will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (12) The application is consistent with the applicable Comprehensive Plan (or any plan incorporating such provisions of the Comprehensive Plan) for the jurisdiction in which the PHA is located.
- (13) The application certifies that according to the appropriate State or local officials that the application is consistent with the applicable Consolidated Plan.
- (14) The PHA complies with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (15) The PHA complies with the Violence Against Women Act and its implementing regulations at 24 C.F.R. Part 5, Subpart Land Parts 960 and 966.
- (16) The PHA complies with the Architectural Barriers Act of 1968 and its implementing regulations at 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (17) The PHA complies with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.
- (18) The PHA complies with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (19) The PHA complies with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (20) The PHA complies with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (21) The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

- (22) The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (23) With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (24) The PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (25) The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (26) The PHA will comply with the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards at 2 CFR Part 200.
- (27) The application and all attachments are available at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Housing Authority of the City of Norwalk	CT002
PHANAME	PHA NUMBER/HA CODE
<i>I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, or submitting a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.</i>	
Rev. Jeffrey A. Ingraham	Chairman
NAME OF AUTHORIZED OFFICIAL*	TITLE
	9/23/21
SIGNATURE	DATE

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

Attachment 1.2: Commitment to Participate in the Fourth Cohort Evaluation

COMMITMENT TO PARTICIPATE	
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING	
Commitment to Participate in the HUD-Sponsored Evaluation of the Fourth Cohort of the MTW Expansion	
<p>In addition to the elements described in PIH Notice 2021-03, HUD will provide additional scope and information about the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion and any additional requirements that the PHA must adhere to.</p> <p>Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I agree to ensure participation of the PHA in the HUD-sponsored evaluation of the first cohort of the MTW Expansion as described in PIH Notice 2021-03 understanding the following considerations:</p>	
<ol style="list-style-type: none"> (1) The PHA must participate in the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion whether or not it receives an MTW designation through the lottery process described in PIH Notice 2021-03. (2) The PHA must follow PIH Notice 2011-65 or its successor notice whether or not it receives an MTW designation through the lottery process described in PIH Notice 2021-03. Adherence to PIH Notice 2011-65 regarding "Timely Reporting Requirements of the Family Report (form HUD-50058 and form HUD- 50058 MTW) into the Public and Indian Housing Information Center" is important to HUD's ability to evaluate the fourth cohort of the MTW Expansion. (3) In event the PHA is not selected to be in the treatment group, the PHA may apply to future cohorts of the MTW Expansion to which the PHA is eligible. Despite a potential designation under a future cohort, the PHA may continue to have obligations under the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion as well. Despite a potential designation under a future cohort, the PHA may not implement MTW activities in the Cohort #4 MTW Activities List in PIH Notice 2021-03 for the duration of the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion. (4) The PHA will cooperate fully with HUD and its contractors for the duration of the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion. Failure to comply with the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion may affect the PHA's ability to apply to future cohorts of the MTW Expansion. 	
Housing Authority of the City of Norwalk <hr/> PHANAME	CT002 <hr/> PHA NUMBER/HA CODE
<p><i>I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, or submitting a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.</i></p>	
Rev. Jeffrey A. Ingraham <hr/> NAME OF AUTHORIZED OFFICIAL*	Chairman <hr/> TITLE
 <hr/> SIGNATURE	9/23/21 <hr/> DATE
<p><i>Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.</i></p>	

Appendix 2: Public Process Documentation

- Evidence that owners, public housing residents and HCV participants were notified of the PHA's intention to participate in the MTW Demonstration program;
- Evidence that one owner meeting and two resident meetings (separate from the public hearing) were held;
- The public notices advertising the:
 - Owner meeting
 - Two resident meetings
 - Public hearing;
- Evidence that the owner meeting, two resident meetings and public hearing were held; and
- A resolution signed by the Board of Commissioners adopting the MTW Plan and application package and the certifications contained therein. This resolution contains:
 - Confirmation of the PHA's desire to obtain MTW designation under the fourth cohort of the MTW Expansion;
 - A statement of the intention to comply with the MTW objectives, the MTW statutory requirements and the MTW Operations Notice;
 - Confirmation that the PHA met the public process requirements in Section 5(C)(i)(c) of Notice PIH 2021-03; and
 - A statement of the commitment to implement the landlord incentive activities proposed in the MTW Plan and application package.

The NHA approved the intent to apply for the Moving to Work demonstration via NHA Board Resolution on September 30, 2021.

The NHA issued electronic notice to HCV owners, public housing residents and HCV participants advising them of the NHA's intent to apply for the MTW program and notification of the two planned resident meetings to discuss the MTW application. (See Attachment 2.1 – Notice to Owners of NHA MTW Application; Attachment 2.2 – Notice to Public Housing Residents of NHA MTW Application; and Attachment 2.3 – Notice to HCV Participants of NHA's MTW Application). Notice was also posted on the PHA's website.

Due to the COVID-19 pandemic, the NHA has adapted its communications strategy in consideration of local conditions and restrictions. The NHA hosted one online landlord input meeting on Monday, July 12 at 6:00 pm and two online resident meetings via Zoom to discuss the MTW application on the following dates:

- Wednesday, August 18, 2021 at 6:00 pm and;
- Thursday, August 26, 2021 at 6:00 pm.

Select screen captures (slides with comments and slides with key information presented) are included.

Comments received from landlords and residents were positive.

- Owners were interested in the PHA being able to pay towards vacancy loss and damage claims. It was stated these initiatives would assist the owner in being better able to make timely repairs, and would decrease some owner resistance to leasing to voucher holders.
- Owners also expressed concerns regarding rising rental costs and the ability for families to locate affordability units.
- Families were most interested in the PHA being able to increase payment standards. Multiple concerns were expressed about higher rents restricting moves into higher opportunity areas.

A virtual public hearing to discuss the NHA MTW application was held on September 16, 2021 at 6:00 pm. (See Attachment 2.4 – Notice of Public Hearing). The public meeting had no attendees outside of NHA staff and the public meeting was adjourned at 6:15 pm. (See Attachment 2.5 – NHA Public Hearing Minutes).

The NHA invited all interested parties to submit public comments on the published MTW draft plan and application via its website at www.norwalkha.org and directly via email.



The slide show presentations for the landlord and resident meetings were added to the NHA's website at www.norwalkha.org along with all of the resident notices and relevant information related to the NHA's MTW Plan and Application.

Attachment 2.1: Notice to HCV Owners of the NHA's Intention to Participate in the MTW Program / Notice of Owner Meeting

This is an important notice. Please have it translated.
Esta es una noticia importante. Por favor hay que traducirlo.
C'est un avis important. Veuillez faire la traduction.

NORWALK HOUSING AUTHORITY MEMORANDUM

To: Norwalk Landlords
From: Kras Carlucci, Deputy Director
Date: June 30, 2021
Subject: Section 8 Program

The Norwalk Housing Authority is applying for a program with HUD that would allow us to offer incentives to current Section 8 landlords and newly participating landlords. NHA will hold a meeting on **July 12, 2021 at 6:00pm** via Zoom to discuss this and would like to invite you to participate. The Zoom information is as follows:

<https://us02web.zoom.us/j/85909241016?pwd=VmtHQzg2OFJDQnFKY0kwWFM2Ny9pdz09>

Meeting ID: 859 0924 1016
Passcode: 588555

Or you can call into the meeting at 646-876-9923 or 301-715-8592 and use the Meeting ID and Passcode above. Any questions, please call Alison at 203-354-1803. Thank you.

Select Landlord Zoom Meeting Screen Captures / Slides

The Landlord Initiatives Zoom presentation included 24 PowerPoints and was led by a narrator from Nan McKay & Associates. Screen shots shown here are to reflect salient questions and comments posed by participating owners. However, comments were also shared orally and by email. Names, phone numbers, and pictures are removed.

The number of participants fluctuated during the presentation. At one point, 20 individuals were participating.



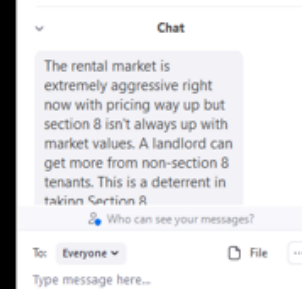
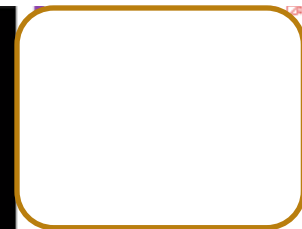
Your Input

- You may share your thoughts within this call/meeting
 - If participating via webinar, may use chat function
 - To group, or privately
 - All may vocally share thoughts
- You may also email: Amukhtar@Norwalkha.org



General Questions

- What is your perspective on current market conditions?



General Questions

- Other than current market conditions, what reasons might make you choose to lease to a non-voucher holder over a voucher holder?

An issue is SB rents based on Census Tracts that have not been updated for all the development happening in Norwalk.

Who can see your messages?

To: Everyone File

Type message here...

Specific Initiatives: Higher Payment Standards

- **Background:**
 - Payment Standards represent the highest amount a PHA may pay on behalf of a family
 - PHAs are prohibited from approving a tenancy where the family share exceeds 40% of the family's monthly adjusted income
 - This initiative would allow the NHA to approve a wider range of rents
 - The rent must still be reasonable as compared to comparable unassisted units

I agree. South Norwalk census tract has been designated as a lower rental value when in fact, it is now the most desirable area for studios to 2/3 brms.

Who can see your messages?

To: Everyone File

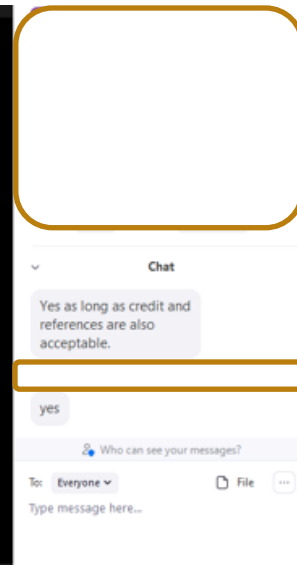
Type message here...

Specific Initiatives: Higher Payment Standards

- **Questions:**
 - Would NHA's ability to pay more on behalf of the family, and possibly approve a higher rent, increase the likelihood of your leasing to a voucher holder?
 - Would the enactment of this initiative remove any barriers to your participation in HCV/S8?

nma

13

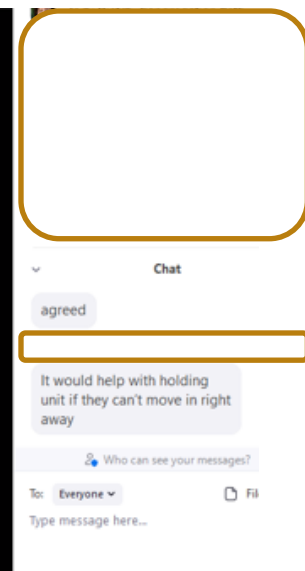


Specific Initiatives: Vacancy Loss

- **Background:**
 - PHA may pay up to one month contract rent
 - Both the outgoing and incoming tenant must be voucher holders
- **Question:**
 - Would this encourage unit improvements between tenants?
 - How would the enactment of this initiative impact the likelihood of your future participation in HCV/S8?

nma

19



Attachment 2.2: Notices to Public Housing Residents / HCV Participants of the NHA's Intention to Participate in the MTW Program and Notice of Resident Meetings

This is an important notice. Please have it translated.
Esta es una noticia importante. Por favor hay que traducirlo.
C'est un avis important. Veuillez faire la traduction.

NORWALK HOUSING AUTHORITY MEMORANDUM

To: All Public Housing Residents
From: Kras Carlucci, Deputy Director
Date: July 20, 2021
Subject: Federal Moving To Work Program

This is notice that the Norwalk Housing Authority intends to apply for the federal Moving to Work Demonstration Program COHORT #4- Landlord Incentives. Incentives we may apply for include increasing payment standards, excessive damage payments and/or payment to cover short-term apartment vacancy. Resident meetings will be held **August 18th** and **August 26th at 6:00pm** to provide in depth information on the program and the opportunity to ask any questions you may have. Log in:

<https://us02web.zoom.us/j/81839101790?pwd=UkNvbXIIU2Y4SXo4WIFCRkt4ZkpZdz09>

Meeting ID: 818 3910 1790 and Passcode: 680991

Call in: 646-876-9923 or 301-715-8592 and use the same Meeting ID and Passcode.

Este es un aviso que la Autoridad de Vivienda de Norwalk tiene la intención de solicitar el programa federal de demostración de mudanza al trabajo COHORTE #4- Incentivos para propietarios. Los incentivos que podemos solicitar incluyen el aumento de los estándares de pago, pagos por daños excesivos y / o el pago para cubrir la vacante del apartamento a corto plazo. Las reuniones de residentes se llevará a cabo el **18 y el 26 de agosto a las 6:00 pm** para proporcionar información detallada sobre el programa y la oportunidad de hacer cualquier pregunta que pueda tener. Inicia sesión:

<https://us02web.zoom.us/j/81839101790?pwd=UkNvbXIIU2Y4SXo4WIFCRkt4ZkpZdz09>

ID de reunión: 818 3910 1790 y Código de acceso: 680991

Llame al: 646-876-9923 o 301-715-8592 y use el mismo ID de reunión y código de acceso.

Sa a remake ke Otorite Lojman Nowalk la gen entansyon aplike pou Program federal nan Demonstrasyon travay amenajman KOWOT#4- Estimilis pou Pwopriyete kay. Estimilis nou kapab aplike yo enkli ogmantasyon estanda pèman, pèman pou twòp domaj ak / oswa pèman pou kouvri apatman vid pou kout tem. Reyinyon rezidan yo ap fet an **18 Out epi 26 Out a 6:00 pm** pou bay an pwofonde enfomasyon sou pwogram nan ak opotinite pou poze nenpot kesyon ou ta genyen. Log in:

<https://us02web.zoom.us/j/81839101790?pwd=UkNvbXIIU2Y4SXo4WIFCRkt4ZkpZdz09>

Reyinyon ID: 818 3910 1790 ak Kòd la: 680991

Rele nan: 646-876-9923 oswa 301-715-8592 epi sevi ak ID nan reyinyon menm ak Passcode.

This is an important notice. Please have it translated.
Esta es una noticia importante. Por favor hay que traducirlo.
C'est un avis important. Veuillez faire la traduction.

NORWALK HOUSING AUTHORITY MEMORANDUM

To: All Section 8 Voucher Holders
From: Kras Carlucci, Deputy Director
Date: July 20, 2021
Subject: Federal Moving To Work Program

This is notice that the Norwalk Housing Authority intends to apply for the federal Moving to Work Demonstration Program COHORT #4- Landlord Incentives. Incentives we may apply for include increasing payment standards, excessive damage payments and/or payment to cover short-term apartment vacancy. Resident meetings will be held **August 18th** and **August 26th at 6:00pm** to provide in depth information on the program and the opportunity to ask any questions you may have. Log in:

<https://us02web.zoom.us/j/81839101790?pwd=UkNvbXlIU2Y4SXo4WIFCRkt4ZkpZdz09>

Meeting ID: 818 3910 1790 and Passcode: 680991

Call in: 646-876-9923 or 301-715-8592 and use the same Meeting ID and Passcode.

Este es un aviso que la Autoridad de Vivienda de Norwalk tiene la intención de solicitar el programa federal de demostración de mudanza al trabajo COHORTE #4- Incentivos para propietarios. Los incentivos que podemos solicitar incluyen el aumento de los estándares de pago, pagos por daños excesivos y / o el pago para cubrir la vacante del apartamento a corto plazo. Las reuniones de residentes se llevará a cabo el **18 y el 26 de agosto a las 6:00 pm** para proporcionar información detallada sobre el programa y la oportunidad de hacer cualquier pregunta que pueda tener. Inicia sesión:

<https://us02web.zoom.us/j/81839101790?pwd=UkNvbXlIU2Y4SXo4WIFCRkt4ZkpZdz09>

ID de reunión: 818 3910 1790 y Código de acceso: 680991

Llame al: 646-876-9923 o 301-715-8592 y use el mismo ID de reunión y código de acceso.

Sa a remake ke Otorite Lojman Nowalk la gen entansyon aplike pou Program federal nan Demonstrasyon travay amenajman KOWOT#4- Estimilis pou Pwopriyete kay. Estimilis nou kapab aplike yo enkli ogmantasyon estanda pèman, pèman pou twòp domaj ak / oswa pèman pou kouvri apatman vid pou kout tem. Reyinyon rezidan yo ap fet an **18 Out epi 26 Out a 6:00 pm** pou bay an pwofonde enfomasyon sou pwogram nan ak opotinite pou poze nenpot kesyon ou ta genyen. Log in:

<https://us02web.zoom.us/j/81839101790?pwd=UkNvbXIIU2Y4SXo4WIFCRkt4ZkpZdz09>

Reyinyon ID: 818 3910 1790 ak Kòd la: 680991

Rele nan: 646-876-9923 oswa 301-715-8592 epi sevi ak ID nan reyinyon menm ak Passcode.

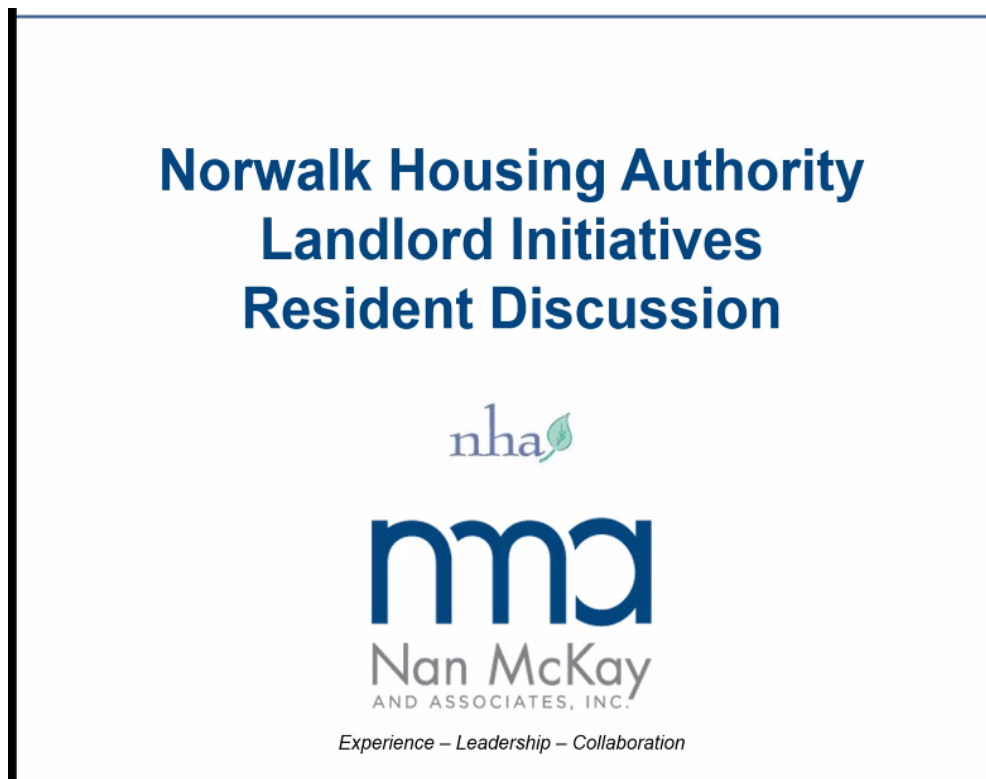
Attachment 2.3: Resident Meeting Specifics

The first public housing resident/HCV participant MTW Landlord Initiatives Zoom presentation was held August 18, 2021 at 6:00 pm.

The second public housing resident/HCV participant MTW Landlord Initiatives Zoom presentation was held August 26, 2021 at 6:00 pm.

Each presentation included 18 PowerPoints and was led by a narrator from Nan McKay & Associates. Screen shots shown here are to reflect salient questions and comments posed by participating residents. However, most comments were shared orally and by email. Names, phone numbers, and pictures are removed for privacy purposes.

The number of participants fluctuated during the presentations. At one point during meeting one, 25 individuals were participating. At one point during meeting two, 10 individuals were participating.

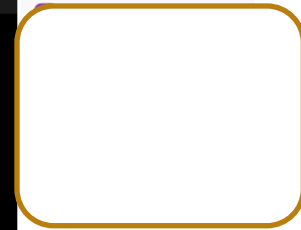


Specific Initiatives

- NHA is considering 3 initiatives:
 - Higher payment standards
 - Tenant damage payments
 - Vacancy loss payments
- We will look at each and ask for your thoughts

10

nma



Chat

voucher. And the payment standards are low. Especially if you want to live in a nice area of Norwalk to raise your children

Great :)

Who can see your messages?

To: Everyone

Type message here...

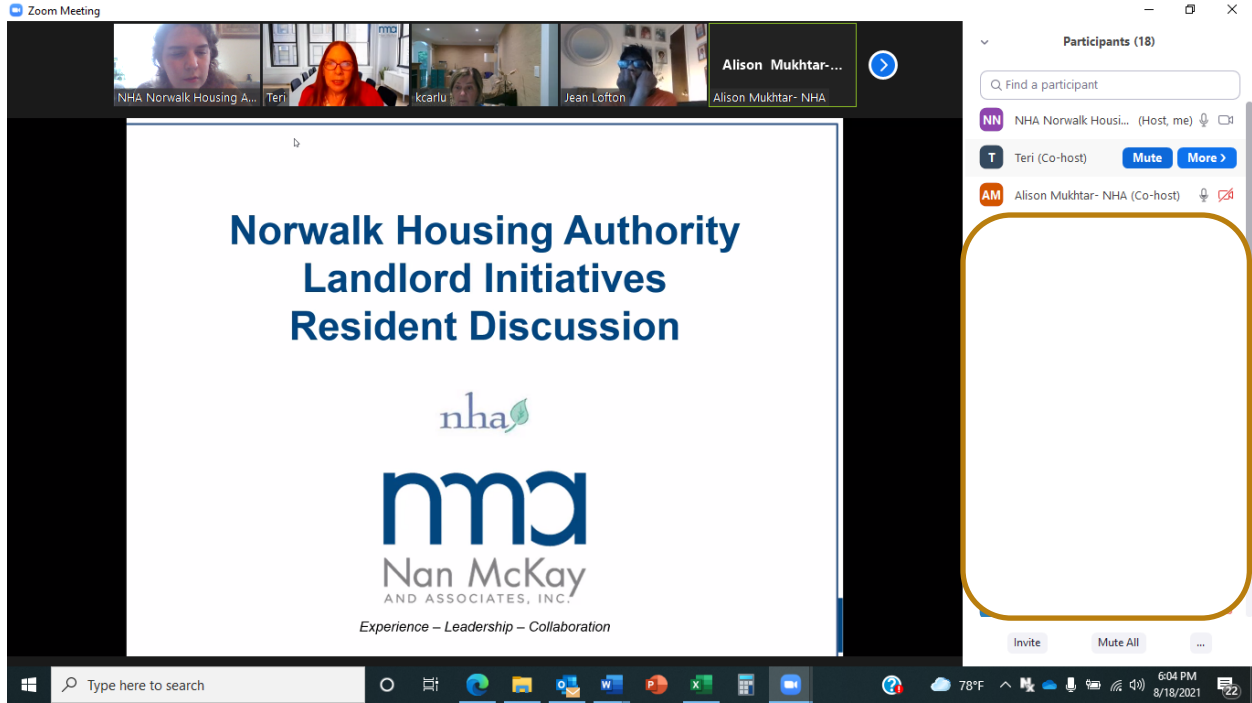
Closing

- Thank you for attending and for your input
- You can learn more about the initiatives in PIH 2021-03
 - Dates of submission shown in this notice were subsequently extended
- Please submit additional questions or comments to: Amukhtar@norwalkha.org

18

nma

Documentation of August 18, 2021 Resident Zoom Meeting

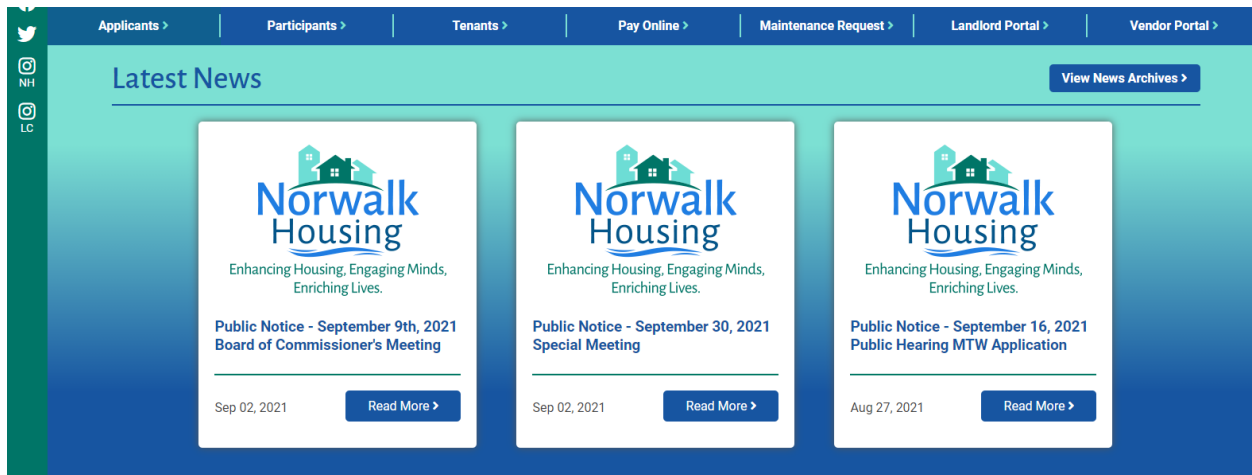


Documentation of August 26, 2021 Resident Zoom Meeting



Attachment 2.4: Notice of Public Hearing on NHA’s MTW Plan and Application

On August 27, 2021, Notice of Public Hearing on NHA’s MTW Plan and Application was published in Norwalk, CT’s local newspaper, The Hour (also known as The Norwalk Hour), and on NHA’s website at: <https://www.norwalkha.org>.



Clicking the “Read More” link takes the reader to:



NOTICE OF PUBLIC HEARING

The Housing Authority of the City of Norwalk, will be conducting a Public Hearing regarding its Moving To Work Application on September 16, 2021 at 6:00p.m. Due to Covid-19, the Public Hearing will be conducted via zoom at:

<https://us02web.zoom.us/j/87951068709?pwd=RzhjK3VJak9oOSttWTNPRVJGUzYzUT09>

Meeting ID: 879 5106 8709 and Passcode: 126128. Or call in at 646-876-9923 and use the meeting ID and passcode above.

Proposed documents will be available for review at the NHA Central Office located at 24 ½ Monroe Street in Norwalk and at www.norwalkha.org. If you have any questions please contact Kras Carlucci, Deputy Director at 203-838-8471. Equal Housing Opportunity.



Ad Order Number 0002652820	Customer Account 109997
Sales Rep. mhutchings	Customer Information NORWALK HOUSING AUTHORITY 24 1/2 MONROE STREET NORWALK CT 06854 USA
Order Taker mhutchings	
Ordered By ALISON	Phone: 2038388471
Order Source Phone	Fax: 2038386535 EMail:

Ad Content Proof

Note: Ad size does not reflect actual ad

NOTICE OF PUBLIC HEARING

The Housing Authority of the City of Norwalk, will be conducting a Public Hearing regarding its Moving To Work Application on September 16, 2021 at 6:00p.m. Due to Covid-19, the Public Hearing will be conducted via zoom at: <https://us02web.zoom.us/j/87951068709?pwd=RzhjK3VJak9oOSItWTNP RVJGUzYzUT09> Meeting ID: 879 5106 8709 and Passcode: 126128. Or call in at 646-876-9923 and use the meeting ID and passcode above.

Proposed documents will be available for review at the NHA Central Office located at 24 1/2 Monroe Street in Norwalk and at www.norwalkha.org. If you have any questions please contact Kras Carlucci, Deputy Director at 203-838-8471. Equal Housing Opportunity.

Ad Cost \$73.50	Payment Amt \$0.00	Amount Due \$73.50
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Blind Box **Materials**

Order Notes

Ad Number 0002652820-01	External Ad #	Pick Up Number
Ad Type Legal Liners	Ad Size 2 X 15 li	PO Number
Color \$0.00	Color Requests	

Product and Zone Norwalk Hour	# Inserts 1	Placement Public Notices
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Note: Retail Display Ads May Not End in Identified Placement

Run Dates
8/27/2021

Attachment 2.5: NHA Public Hearing Minutes

PUBLIC MEETING; Meeting Minutes

Virtual Meeting held September 16, 2021 at 6:00 pm via Zoom

The public meeting was held by Zoom on September 16, 2021. Although scheduled for 6:00 pm, the meeting was opened at 5:50 for early arrivals. In the Zoom meeting representing the PHA were:

Krasimira Carlucci, NHA Deputy Director

Anna T. Keegan, NHA Director of Housing Operations

Alison Mukhtar, NHA Housing Operations Specialist

Teri Robertson (facilitator)

At 6:15 pm, the attendees reached the conclusion that all who wished their opinion heard had attended one of the previously held meetings: The Owner meeting (held July 12, 2021 6:00 pm) or one of the two Resident Meetings (held August 18, 2021 6:00 pm and August 26, 2021 6:00 pm). The meeting was adjourned.

Respectfully submitted

Teri Robertson

Nan McKay & Associates

Meeting Facilitator



Attachment 2.6: NHA Board Resolution Approving the NHA's Application for the MTW Demonstration Program

Resolution of the Norwalk Housing Authority Board of Commissioners


Resolved: The Norwalk Housing Authority desires to obtain Moving to Work (MTW) designation under the 4th cohort of the MTW Expansion.

Resolved: In order to obtain this designation, the Norwalk Housing Authority intends to comply with the MTW statutory requirements and the objectives of the MTW Operations Notice.

Resolved: Whereas the Norwalk Housing Authority has met the public process requirements in Section 5(C)(i)(c) of PIH Notice 2021-03 by holding one landlord meeting and two resident meetings in addition to a public hearing in order to declare the Norwalk Housing Authority's intention to apply for MTW status under cohort 4 and to solicit input from all stakeholders.

Resolved: The Norwalk Housing Authority herein states its commitment to implement the landlord incentive activities proposed in the MTW Plan and application package.


_____ September 30, 2021
Adam Bovilsky, Executive Director Date


_____ September 30, 2021
Rev. Jeffrey Ingraham, Chairman Date

Appendix 3: Required Standard Forms

- Certification of Consistency with the Consolidated Plan (form HUD-2991);
- Certification of Payments (form HUD-50071); and
- Disclosure of Lobbying Activities (SF-LLL) [NONE]



Attachment 3.1: Certification of Consistency with the Consolidated Plan (Form HUD-2991)



OMB Approval No. 2506-0112 (Exp. 12/31/2018)

**Certification of Consistency
with the Consolidated Plan**

U.S. Department of Housing
and Urban Development

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

Applicant Name: Housing Authority of the City of Norwalk

Project Name: Low Rent Public Housing and Housing Choice Voucher Program

Location of the Project: Norwalk, CT

Name of the Federal Program to which the applicant is applying: Moving To Work Demonstration Cohort #4- Landlord Incentives

Name of Certifying Jurisdiction: City of Norwalk, CT

Certifying Official of the Jurisdiction Name: Harry W. Rilling

Title: Mayor, City of Norwalk, CT

Signature: *Harry W. Rilling*

Date: 10/5/2020



Attachment 3.2: Certification of Payments (form HUD-50071)

OMB Approval No. 2577-0157 (Exp. 11/30/2023)

**Certification of Payments
 to Influence Federal Transactions**

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

Housing Authority of the City of Norwalk

Program/Activity Receiving Federal Grant Funding

Low Rent Public Housing and Housing Choice Voucher

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

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

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

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

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

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Adam Bovilsky

Title

Executive Director

Signature



Date (mm/dd/yyyy)

09/23/2021

Previous edition is obsolete

form HUD 50071 (01/14)



Attachment 3.3: Disclosure of Lobbying Activities (SF-LLL)

None.

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
 (See reverse for public burden disclosure.)

Approved by OMB
 0348-0046

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 4c			5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:		
6. Federal Department/Agency:			7. Federal Program Name/Description: CFDA Number, if applicable: _____		
8. Federal Action Number, if known:			9. Award Amount, if known: \$		
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): None			b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): None		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature: <u></u> Print Name: <u>Adam Bovilsky</u> Title: <u>Executive Director, Norwalk Housing Authority</u> Telephone No.: <u>203-838-8471</u> Date: <u>09/23/2021</u>		
Federal Use Only:					Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

Appendix 4: Other Supporting Documentation

- Mayor Letter of Support
- Owner and Resident Presentation Slides

Attachment 4.1: Letter of Support, Office of the Mayor, City of Norwalk



CITY OF NORWALK
Office of the Mayor
Harry W. Rilling
hrilling@norwalkct.org
www.norwalkct.org
P: 203-854-7701 / F: 203-854-7939
125 East Avenue
Post Office Box 5125
Norwalk, CT 06856-5125

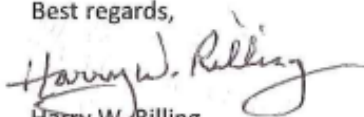
To Whom it May Concern,

I write in support of the Norwalk Housing Authority (NHA) application to become a Moving to Work Agency.

The Norwalk Housing Authority (NHA) has a long history as an innovative and engaged agency within the City of Norwalk. In addition to its long-standing high levels of performance administering to Section 8 and Public Housing residents, the NHA has a long history of providing cutting edge services to help its residents break the cycle of poverty, including establishing learning centers to help school children flourish academically, higher payment standards for certain census tracts to enable section 8 residents to move to areas of higher opportunity for themselves and their children, and self-sufficiency programs to help adult residents achieve educational and economic goals. In addition to these vital programs, with its Choice Neighborhood Initiative, the NHA transformed a South Norwalk neighborhood with substantial improvements to a local park, neighborhood facades, and by increasing the number of low-income families served in mixed income developments. The NHA has truly taken substantial steps to providing safe, decent affordable housing that any resident in Norwalk would be happy to live in.

If the NHA is selected to become a Moving to Work Agency, they would be able to enact landlord incentives under cohort #4 including higher payment standards, damage payments to landlords and vacancy loss payments. These incentives would increase opportunities for Norwalk residents with Housing Choice Vouchers to move to and remain in areas of greater opportunity, and encourage landlords to make repairs and provide better housing stock for all Norwalk residents. Given the many steps the NHA has already taken over the years to help Norwalk residents, I unconditionally support its application to become a Moving to Work agency, and believe that the flexibilities allowed them under this program would benefit both NHA residents and indirectly, the City as a whole.

Best regards,


Harry W. Rilling
Mayor



Attachment 4.2: NHA MTW Plan and Application Timeline

MTW Expansion Cohort #4 MTW Application Package

Timeline

Action	Published Notice Date	Actions	Date of Action
Resident Intent to Apply Meeting #1	July 20, 2021	Invite residents /participants to attend; discuss intended initiatives/ solicit comments	August 18, 2021
Resident Intent to Apply Meeting #2	July 20, 2021	Invite residents /participants to attend; discuss intended initiatives/ solicit comments	August 26, 2021
Public Hearing	August 27, 2021	Notice of Public Hearing on MTW Plan and application published in local newspaper and on NHA's website, with links to MTW application documentation	September 16, 2021
Board Meeting		Approve MTW application	September 30, 2021



Attachment 4.3: NHA MTW Plan and Application Resident Presentation Slides

Norwalk Housing Authority

Landlord Initiatives

Resident Discussion





Nan McKay

AND ASSOCIATES, INC.

Expertos • Creativos • Colaborativos

1

Welcome and Introductions


- **Host:** Krasimira Carlucci
- **NHA Representatives:**
 - Alison Mukhtar
 - Anna Keegan
- **Moderator:** Teri Robertson



2

Landlord Initiatives - Background


- **Public Housing Authorities (PHAs) may apply to HUD to enact specially authorized landlord initiatives for Housing Choice Voucher (HCV) / Section 8 landlords**
 - Outside of regular program requirements
- **No public housing initiatives are covered under this initiative**



3

Landlord Initiatives - Background


- **PHAs chosen to enact special initiatives will be chosen by lottery**
 - **MUST** be chosen by HUD in order to put these special initiatives in place



4

Landlord Initiatives - Background


- **NHA is applying**
 - Must submit application by mid-October
 - Must take specified actions
- **Your input is desired**



5

Your Input

- **You may share your thoughts within this call/meeting**
 - if participating via webinar, may use chat function
 - To group, or privately
 - All may vocally share thoughts
- **You may also email:** Amukhtar@Norwalkha.org




6

General Questions

- What obstacles or barriers have you or others encountered in utilizing a voucher?


- What obstacles or barriers do you encounter in working with NHA?



7

General Questions


- What is your perspective on current market conditions?



8

General Questions

- Other than current market conditions, what reasons might block a voucher holder's ability to successfully lease up with their voucher?



9

Specific Initiatives

- NHA is considering 3 initiatives:
 - Higher payment standards
 - Tenant damage payments
 - Vacancy loss payments
- We will look at each and ask for your thoughts



10

Specific Initiatives: Higher Payment Standards


- Background:
 - Payment Standards represent the highest amount a PHA may pay on behalf of a family
 - PHAs are prohibited from approving a tenancy where the family share exceeds 40% of the family's monthly adjusted income
 - This initiative would allow the NHA to approve a wider range of rents
 - The rent must still be reasonable as compared to comparable unassisted units



11

Specific Initiatives: Higher Payment Standards

- Questions:
 - Would NHA's ability to pay more on behalf of the family, and possibly approve a higher rent, increase the likelihood of a voucher holder successfully finding a unit to lease?
 - Would a voucher holder look in additional areas due to this initiative?
 - Would the enactment of this initiative remove any barriers to participation in HCVIS?




12

General Questions

- What obstacles or barriers have you or others encountered in utilizing a voucher?


- What obstacles or barriers do you encounter in working with NHA?



7

General Questions


- What is your perspective on current market conditions?



8

General Questions

- Other than current market conditions, what reasons might block a voucher holder's ability to successfully lease up with their voucher?



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11

Specific Initiatives: Higher Payment Standards


- Questions:
 - Would NHA's ability to pay more on behalf of the family, and possibly approve a higher rent, increase the likelihood of a voucher holder successfully finding a unit to lease?
 - Would a voucher holder look in additional areas due to this initiative?
 - Would the enactment of this initiative remove any barriers to participation in HC/VIS8?



12

Specific Initiatives: Damage Claims


- Background:**
 - PHA may pay towards family caused damages as assessed at move-out
 - No more than two month's contract rent, minus security deposit
 - May require additional PHA/owner actions:
 - PHA documenting unit condition at move-in
 - Owner contacting PHA when family moves out, requesting damage claim inspection
 - PHA conducts damage claim inspection; compares unit condition to move in



13

Specific Initiatives: Damage Claims


- Questions:**
 - How would this initiative change the owner's perception of the program? Of the PHA?
 - If/when you've moved, have you had damages taken out of your security deposit?
 - if yes, approximately how much?



14

Specific Initiatives: Vacancy Loss


- Background:**
 - PHA may pay up to one month contract rent
 - Both the outgoing and incoming tenant must be voucher holders
- Question:**
 - How would the enactment of this initiative impact the successful leasing of a voucher holder?



15

Closing Questions


- Which of the initiatives do you see as the most positive?
 - Higher payment standard
 - Damage claim payment
 - Vacancy loss payment



16

Closing Questions


- Anything else you would like to share?
- Your input will be considered as NHA decides on which initiatives to apply for
- NHA must be chosen by HUD in order to implement any of these initiatives



17

Closing

- Thank you for attending and for your input
- You can learn more about the initiatives in PIH 2021-03
 - Dates of submission shown in this notice were subsequently extended
- Please submit additional questions or comments to: Amukhtar@norwalkha.org



18

