

Community Development Committee

For the Metropolitan Council meeting of September 22, 2021

Subject: Annual Public Housing Agency Plan Approval

Proposed Action

That the Metropolitan Council:

1. Approve the 2022 Annual Public Housing Agency (PHA) Plan, including changes to the Housing Choice Voucher Administrative Plan as described in this report and attachments.
2. Authorize the Metropolitan Council Chair to execute the required certifications.
3. Direct staff to submit the final Plan to the U.S. Department of Housing and Urban Development.

Summary of Committee Discussion/Questions

Stephanie Paulson, Assistant Director of the Metropolitan Council Housing and Redevelopment Authority (Metro HRA) presented the staff report to the Committee. Council Members clarified that no changes had been made since the Annual PHA Plan was first presented to the Community Development Committee on August 2, 2021. Council Members also clarified the nature of written public comments.

Council Member Chamblis made the motion to approve the proposed action.

Council Member Johnson seconded the motion. All voted in favor of the proposed action.

Community Development Committee

Meeting date: Tuesday, September 7, 2021

For the Metropolitan Council meeting of September 22, 2021

Subject: Annual Public Housing Agency Plan Approval

District(s), Member(s): District(s), Member(s): All

Policy/Legal Reference: 24 Code of Federal Regulations, Part 903

Staff Prepared/Presented: Stephanie Paulson, Assistant Director, Housing and Redevelopment Authority, (651) 602-1584

Division/Department: Community Development / Housing and Redevelopment Authority

Proposed Action

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Background

As an administrator of the U.S. Department of Housing and Urban Development (HUD) Housing Choice Voucher program, the Council's Housing and Redevelopment Authority (Metro HRA) is required to prepare and submit an annual update to its Public Housing Agency (PHA) Plan.

The PHA Plan serves as a guide to the Metro HRA programs, policies, operations and strategies for serving the needs of very low and extremely low-income households. The PHA Plan is intended to be a convenient source of information for program participants, HUD and the general public.

There are two parts to the PHA Plan. The Five (5) Year Plan (last approved in 2019 for the years 2020-2024) describes the mission of the agency and the agency's long-range goals and objectives for achieving its mission over a five-year period. The Annual Plan (last approved in 2020 for the year 2021) is an update relating to the general policies and procedures for providing service in the coming year and is the subject of this approval.

The Housing Choice Voucher Administrative Plan, the main policy document of the Metro HRA, is reviewed and updated annually as HUD adopts new or revised regulations and as the agency determines a need for policy revisions. The Administrative Plan becomes an attachment to the PHA Plan. Staff has prepared updates to the Annual PHA Plan and the Housing Choice Voucher Administrative Plan.

The [2022 Metro HRA PHA Annual Plan \(metro council.org\)](https://metro council.org), the [2021 Housing Choice Voucher Administrative Plan DRAFT \(metro council.org\)](https://metro council.org) with all changes red-lined, and a Summary of Proposed Changes are attached and available for review online.

Staff have had several conversations with Council Members on the Project Based Voucher program and the recommended changes:

- [3-1-2021 Project Based Voucher Offer and Award Discussion](#)

- [6-7-2021 Project Based Voucher Offer and Award Discussion Continued](#)
- [8-02-2021 Public Housing Agency Plan Discussion](#)
- [8-16-2021 Public Hearing - Annual Public Housing Agency Plan 2022](#)
- [8-25-2021 Annual Public Housing Agency Plan](#)

Staff recommends approval of the 2022 Annual PHA Plan and the amendments to the Housing Choice Voucher Administrative Plan as proposed.

Rationale

Federal regulations for the Housing Choice Voucher Program require submittal of the Annual PHA Plan.

Thrive Lens Analysis

The PHA Plan and Housing Choice Voucher Administrative Plan support the Thrive outcomes of equity, livability, and stewardship. By using a Thrive Lens, discretionary policies of the HRA promote equity and choice, while ensuring that the federal resources to fund the Housing Choice Voucher Program are maximized to serve families efficiently.

Funding

Developing the Public Housing Agency Plan is a regular part of the Metro HRA's annual workload and ensures compliance with the U.S. Department of Housing and Urban Development.

Known Support / Opposition

As required by HUD, the draft Plan was open for a 45-day public comment period. There is known opposition by a faith-based housing developer regarding the proposed changes related to the offer and award of project-based vouchers (PBVs). There were three verbal commenters at the public hearing held on August 16, 2021, requesting an annual offer and award commitment of PBVs. To date, the Metro HRA has received just over 100 written comments. All appear to be affiliates of the same faith-based organization that would like PBVs offered and awarded each year. There has also been engagement with the Metro HRA Resident Advisory Board who support the recommended changes in the Plan (2022 Metro HRA PHA Annual Plan, Attachment E).

After review of the public comments received, staff recommends approval of the documents as presented.

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| Streamlined Annual PHA Plan (HCV Only PHAs) | U.S. Department of Housing and Urban Development Office of Public and Indian Housing | OMB No. 2577-0226 Expires 02/29/2016 |
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment, and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

| A. | PHA Information. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| A.1 | <p> PHA Name: <u>Metropolitan Council Housing and Redevelopment Authority</u> PHA Code: <u>MN 163</u> PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>1/2022</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) <u>6894</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Participating PHAs</th> <th style="width: 10%;">PHA Code</th> <th style="width: 25%;">Program(s) in the Consortia</th> <th style="width: 20%;">Program(s) not in the Consortia</th> <th style="width: 20%;">No. of Units in Each Program</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> | Participating PHAs | PHA Code | Program(s) in the Consortia | Program(s) not in the Consortia | No. of Units in Each Program | Lead HA: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| B. | Annual Plan. | | | | |
| B.1 | <p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Informal Review and Hearing Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification.</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</p> <p>Revised Housing Choice Voucher Changes are listed as Attachment B Summary of Changes.</p> | | | | |
| B.2 | <p>New Activities</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p>(b) If this activity is planned for the current Fiscal Year, describe the activities. Provide the projected number of project-based units and general locations and describe how project-basing would be consistent with the PHA Plan.</p> <p>The Metropolitan Council HRA has awarded a total of 970 PBVs in 55 projects throughout the Twin Cities region. The HRA will offer and award up to 20% of its Housing Choice Voucher baseline allocation in Project Based Vouchers. The service area of the Metro HRA spans nearly 100 communities. The HRA will award PBVs according to the offer and award criteria outlined in Chapter 17 of the Administrative Plan.</p> <p>(c) Streamline Conversion in partnership with Minneapolis Public Housing Authority</p> <p>The Minneapolis Public Housing Authority (MPHA) owns 98 units of public housing in 15 developments in 12 suburban communities where Metro HRA operates the Housing Choice or Project Based Voucher program. The MPHA and Metro HRA are in discussions about the potential of doing a transfer of these units from MPHA to Metro HRA. MPHA and Metro HRA will enter into a Management Agreement for these units to allow MPHA to continue operating them as public housing. Concurrently the agencies will submit a request under Streamlined Voluntary Conversion to HUD to dissolve the units as public housing. If approved by HUD, Metro HRA will apply for Tenant Protection Vouchers to provide the families with the required relocation notices and relocate them to the housing of their choice with tenant-based assistance (through the Tenant Protection Voucher award), including their right to remain in the current unit. The process will include resident meetings.</p> | | | | |
| B.3 | <p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N N/A</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> | | | | |
| B.4 | <p>Civil Rights Certification</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> | | | | |

B.5

Certification by State or Local Officials.

[Form HUD 50077-SL](#), *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

B.6

Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan.

GOAL: Maintain/increase the availability of decent, safe and affordable housing and be responsible stewards of the region's finite resources

- Maximize utilization of Section 8 Housing Choice Voucher program funds and vouchers
- Apply for additional Vouchers if made available
- Administer the Project -Based Voucher program and continue to offer PBVs as an opportunity to gain affordable units in resource rich neighborhoods.
- Continue to own and operate 150 Council-owned affordable housing units in suburban locations
- Maintain high performer Section 8 Management Assessment Program (SEMAP) status
- Continue to assess HRA operations, evaluate current policies and procedures to ensure the agency is operating at its optimal level
- Continue to apply for new funding and program opportunities when they become available
- Continue to work towards receiving a Moving to Work status through either a regional designation in partnership with Minneapolis Public Housing or through a HUD MTW Cohort Expansion

PROGRESS:

- Maintained 100% utilization for the HCV program in most recent funding year.
- Received and leased up an additional 114 Mainstream Voucher and an Opt Out that included 12 Tenant Protection Vouchers.
- Awarded 81 new Project Based Vouchers.
- Operated 150 Council-owned housing units at 97% occupancy, in partnership with Kingwood Management.
- Continue to assess operations, policies and procedures and make policy and procedural changes as needed.
- Applied for the Mobility Demonstration Program through a competitive grant application in partnership with Minneapolis Public Housing and was selected to participate in the six-year demonstration. This award will add 78 new vouchers to the HRA.
- Received 218 Emergency Housing Vouchers to be used for people who are experiencing homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence and at high risk of housing instability.

GOAL: Increase assisted housing choices for all residents across race, ethnicity and income through expansive owner recruitment and retention efforts

Recruitment:

- Conduct landlord outreach to unit owners, including owners in resource rich areas
- Conduct regular landlord meetings to explain program for new or potential landlords
- Conduct presentations to educate landlords and property owners about the Section 8 program at various landlord groups
- Conduct focus group conversations to non-participating landlords
- Maintain HRA web page providing program information to potential landlords

Retention:

- Conduct annual owner workshops
- Maintain HRA web page providing program information for current landlords
- Circulate quarterly owner newsletter

PROGRESS:

- Provided housing search assistance for hard-to-house voucher holders in all areas of the region, including resource-rich areas
 - Assisted 69 hard-to-house families with voucher placement
 - Referred 777 housing units to program participants
- Conducted 8 landlord meetings
- Conducted resident engagement sessions for SAFMR implementation and the MTW application under the rent reform cohort

GOAL: Encourage movement to areas in the region with less than 20% poverty and above average performing schools.

- Educate participants on potential outcomes of moving to high-opportunity areas near good schools with lower crime and along the region's transit routes
- Provide mobility counseling services to educate and encourage movement to resource rich areas
- Measure progress and learn from results to guide policy refinement
- Continue to look at regional partnerships that allow choice and access for families in the region. Apply for Mobility Demonstration from the funds allocated through the Consolidated Appropriations Act, 2019

PROGRESS:

- Applied for the Mobility Demonstration Program through a competitive grant application in partnership with Minneapolis Public Housing and was selected to participate in the six-year demonstration. This award will add 78 new vouchers to the HRA .
- 59 Active participants in Community Choice, Mobility Counseling Program
 - 8 in Post-Move status that includes quarterly home / remote visits
 - 25 graduated – completed 2 years as an enrolled participant
- 38 voucher holders attended tenant education workshops
- 3 families attended financial literacy and tenant education classes.

GOAL: Administer programs to encourage integrated settings to provide rental assistance for persons with disabilities

- Administer the Minnesota State funded Bridges Rent Assistance program to provide rent assistance to persons with disabilities in partnership with Anoka, Hennepin and Ramsey counties
- Administer the Non-Elderly Disabled program, providing Section 8 rental assistance to disabled families and individuals

- Administer the Continuum of Care program, a program administered in partnership with the Metro HRA to provide rent assistance and the Hennepin, Ramsey and Anoka County to provide case management to ensure success in independent living for disabled households
- Administer a Family Unification Program in partnership with Anoka county, promoting housing stability for families involved in the child protection system
- Apply for additional Mainstream vouchers, if available

PROGRESS:

- Continue to provide housing assistance for persons with mental illness through the Bridges Program.
- Continue to assist 200 non-elderly people with disabilities through Non-Elderly Disabled (NED) Vouchers
- Awarded 89 Mainstream Vouchers in 2018, 67 in 2019 and additional 47 in 2020 to provide rent assistance for non-elderly persons with disabilities experiencing homelessness or at risk of homelessness.

GOAL: Contribute to the State of MN goal of ending long-term homelessness and the Federal strategic plan to prevent and end homelessness

- Administer a Veteran’s Affairs Supportive Housing (VASH) Program
- Provide PBV assistance in developments that serve people experiencing homelessness
- Administer a Continuum of Care program to house homeless persons with disabilities using the Housing First model and person-centered approach
- Administer the Mainstream Voucher Program to provide federal voucher subsidy to people experiencing homelessness and using the Metro Transit system as temporary shelter
- Explore opportunity for rent assistance programs to assist in stabilizing homeless families that partner with schools and other providers
- Implement a Move-Up preference that would give a priority on the Housing Choice Voucher waiting list to individuals and families that transitioning or “moving-up” from Permanent Supportive Housing Units

PROGRESS:

- Received 218 Emergency Housing Vouchers to be used for people who are experiencing homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence and at high risk of housing instability.
- Administer the VASH program serving 170 formerly homeless veterans
- Continue to award PBV to housing providers serving homeless populations.
- Implemented a Move-Up preference for 40 vouchers to individuals and families transitioning out of permanent supportive housing, in cooperation with the Continuums of Care.
- Implemented a Homework Starts with Home partnership with Solid Ground and Suburban Ramsey schools to provide rent assistance to students and their families experiencing or at risk of homelessness.
- Partner with local Public Child Welfare Agencies to provide voucher assistance to youth with a current or prior history of child welfare involvement through the Foster Youth to Independence program. Eligible youth must be between the ages of 18 and 24 years old.
- Continue to explore and apply for funding opportunities as they arise.

GOAL: Promote self-sufficiency and stabilize families

- Educate voucher tenants through financial literacy and tenant education classes
- Provide housing search assistance to applicants with high barriers
- Focus on a person-centered approach, setting program participants up for success
- Administer a Family Self-Sufficiency Program
- Provide PBVs in supportive housing projects
- Implement harm reduction and prevention strategies to foster housing stability
- Research and explore HCV Homeownership program

PROGRESS:

- Continue to operate PBV’s in supportive housing projects that focus on self-sufficiency.
- Provide tenant education and financial literacy classes to voucher families experiencing barriers to success.
- Continue to explore funding and partnership opportunities that encourage self-sufficiency, including the implementation of a Move-Up preference.

B.7 Resident Advisory Board (RAB) Comments.

(a) Did the RAB(s) provide comments to the PHA Plan?

Y N

(a) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

The Resident Advisory Board provided valuable comments and input on the implementation of Small Area Fair Market Rents and the virtual meetings due to COVID-19. Although no changes are being made to the PHA Plan as a result, there will be changes made to internal documents and processes related to SAFMRs.

Instructions for Preparation of Form HUD-50075-HCV

Annual PHA Plan for HCV Only PHAs

A. PHA Information. All PHAs must complete this section. ([24 CFR §903.23\(4\)\(e\)](#))

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **Number of Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

B. Annual Plan. All PHAs must complete this section. ([24 CFR §903.11\(c\)\(3\)](#))

B.1 Revision of PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income families who reside in the PHA’s jurisdiction and other families who are on the Section 8 tenant-based waiting list. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(1\)](#) and [24 CFR §903.7\(a\)\(2\)\(i\)](#)). Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. ([24 CFR §903.7\(b\)](#))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. ([24 CFR §903.7\(c\)](#))

Rent Determination. A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. ([24 CFR §903.7\(d\)](#))

Operation and Management. A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. ([24 CFR §903.7\(e\)\(3\)\(4\)](#)).

Informal Review and Hearing Procedures. A description of the informal hearing and review procedures that the PHA makes available to its applicants. ([24 CFR §903.7\(f\)](#))

Homeownership Programs. A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. ([24 CFR §903.7\(k\)](#))

Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA’s partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA’s partnerships with other entities, and activities under section 3 of the Housing and Community Development Act of 1968 and under requirements for the Family Self-Sufficiency Program and others. Include the program’s size (including required and actual size of the FSS program) and means of allocating assistance to households. ([24 CFR §903.7\(l\)\(i\)](#)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. ([24 CFR §903.7\(l\)\(iii\)](#)).

Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#))

Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. Should the PHA fail to define ‘significant amendment/modification’, HUD will consider the following to be ‘significant amendments or modifications’: a) changes to rent or admissions policies or organization of the waiting list; or b) any change with regard to homeownership programs. See guidance on HUD’s website at: [Notice PIH 1999-51](#). ([24 CFR §903.7\(r\)\(2\)\(ii\)](#))

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

- B.2 New Activity.** If the PHA intends to undertake new activity using Housing Choice Vouchers (HCVs) for new Project-Based Vouchers (PBVs) in the current Fiscal Year, mark “yes” for this element, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake this activity, mark “no.” ([24 CFR §983.57\(b\)\(1\)](#) and Section 8(13)(C) of the United States Housing Act of 1937.
- Project-Based Vouchers (PBV).** Describe any plans to use HCVs for new project-based vouchers. If using PBVs, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.
- B.3 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. ([24 CFR §903.11\(c\)\(3\)](#), [24 CFR §903.7\(p\)](#))
- B.4 Civil Rights Certification.** Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#))
- B.5 Certification by State or Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, including the manner in which the applicable plan contents are consistent with the Consolidated Plans, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#))
- B.6 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.11\(c\)\(3\)](#), [24 CFR §903.7\(r\)\(1\)](#))
- B.7 Resident Advisory Board (RAB) comments.** If the RAB provided comments to the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 4.5 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality

Metropolitan Council Housing and Redevelopment Authority, MN163

2022 Public Housing Agency Plan

Attachments Table of Contents

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| Attachment E | Resident Advisory Board (RAB) Comments |
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Attachment A

**2021 Administrative Plan for the
Housing Choice Voucher Program**

Is located on the PHA Website:

<http://metro council.org/Housing/Publications-Resources-NEW.aspx>

Click on Metro HRA PLANS & REPORTS

2021 Housing Choice Voucher Administrative Plan

Summary of Changes

Metropolitan Council, Metro HRA

The Summary of Changes provides an overview of the recommended red-lined changes to the 2020 Housing Choice Voucher Administrative Plan.

CHAPTER 4: APPLICATIONS, WAITING LIST AND TENANT SELECTION

4-III.C. SELECTION & HCV FUNDING SOURCES

TARGETED FUNDING [24 CFR 982.203]

The HRA is proposing to expand its targeted funding programs to include “Foster Youth to Independence” vouchers and “Emergency Housing Vouchers.” The Foster Youth to Independence (FYI) allocation will provide voucher assistance to youth with a current or prior history of child welfare involvement. Families applying for FYI must be referred by a Public Child Welfare Agency. Youth are considered eligible if they are between the ages of 18-24 years old, left foster care, or will leave foster care within 90 days; and are homeless or at risk of becoming homeless [PIH 2020-28]. The Metro HRA was awarded 218 Emergency Housing Vouchers as a part of the American Rescue Plan. These new vouchers will serve people who are homeless, at risk of homelessness, fleeing or attempting to flee domestic violence or at high risk of housing instability [PIH 2021-15].

DISCRETIONARY CHANGE: This policy implementation would assist the Metro HRA in meeting its goals to end homelessness in the State of Minnesota.

CHAPTER 5: BRIEFINGS AND VOUCHER ISSUANCE

5-I.B. BRIEFING [24 CFR 982.301]

This proposed policy changes provide cleaner language that will match current procedure. Policy language was also added to include the use of Remote Briefings [PIH 2020-32]. HUD authorized the use of remote briefings in response to Covid-19 social distancing guidance. HUD also outlined guidelines for accommodating persons with disabilities, persons with Limited English Proficiency (LEP) and reasonable accommodation requests.

DISCRETIONARY CHANGE: Clarifying language and revision to policy language to include the use of allowable remote briefings.

CHAPTER 6: INCOME AND SUBSIDY DETERMINATIONS

6-III.C. APPLYING PAYMENT STANDARDS [24 CFR 982.505; 982.503(b)]

The proposed policy change provides cleaner language that will match current procedure.

DISCRETIONARY CHANGE: Clarifying language.

CHAPTER 8: INSEPTIONS AND RENT REASONABLENESS

8-I.E. SPECIAL REQUIREMENTS FOR CHILDREN WITH ENVIRONMENTAL INTERVENTION BLOOD LEAD LEVEL [24 CFR 35.1225; FR NOTICE 01/13/17; PIH 2017-13]

The proposed change updates an additional citation for guidance [40 CFR 745.227].

DISCRETIONARY CHANGE: Clarifying language.

REMOTE VIDEO INSPECTIONS (RVIs) [PIH 2020-31]

HUD has authorized the use of Remote Video Inspections (RVIs). HQS inspectors perform the HQS inspection from a remote location using video streaming technology via a person at the inspection site who serves as a proxy. The Metro HRA will use RVIs for minor reinspection items, by request to accommodate health related issues, in response to inclement weather or by reasonable requests on a case-by-case basis.

DISCRETIONARY CHANGES: The implementation of RVIs would be a reduction in administrative staff time and would allow the HRA to use some of the saved time for owner education and a streamlined approach for inspection completion.

8-II.C. ANNUAL/BIENNIAL HQS INSPECTIONS [24 CFR 982.405(a) and 982.406; PIH 2016-05]

This proposed policy changes provide cleaner language that will match current procedure. The Metro HRA reserves the right to require annual inspections for any units or owner.

DISCRETIONARY CHANGE: Clarifying language.

8-II.E. QUALITY CONTROL INSPECTIONS [24 CFR 982.405(b), 24 CFR 985.3(e); HCV GB p 10-32]

This proposed policy change provides cleaner language that will match current procedure. The Metro HRA Quality Control Inspections will be sample from a cross section of neighborhoods and inspectors.

DISCRETIONARY CHANGE: Clarifying language.

8-II.C. HOW COMPARABILITY IS ESTABLISHED

This proposed policy change provides additional citation for guidance [PIH 2020-19].

DISCRETIONARY CHANGE: Clarifying language.

CHAPTER 16: PROGRAM ADMINISTRATION

16-III.B INFORMAL REVIEWS [24 CFR 982.554(b)]

16-III.C. INFORMAL HEARINGS [24 CFR 982.555]

This proposed policy changes provide cleaner language that will match current procedure. Policy language was also added to include the use of Remote Informal Reviews and Informal Hearings [PIH 2020-32]. HUD authorized the use of remote Informal Reviews and Informal Hearings in response to Covid-19 social distancing guidance. HUD also outlined guidelines for accommodating persons with disabilities, persons with Limited English Proficiency (LEP) and reasonable accommodation requests.

DISCRETIONARY CHANGE: Clarifying language and revision to policy language to include the use of allowable remote Informal Reviews and Informal Hearings.

CHAPTER 17: PROJECT-BASED VOUCHERS (PBVs)

17-I.A. OVERVIEW

The Metro HRA has added Exhibit 17-1 to provide detailed information on projects that include PBV assistance.

DISCRETIONARY CHANGE: Clarifying language.

17-II.B. OWNER PROPOSAL SELECTION PROCEDURES [24 CFR 983.51]

The Metro HRA will consider the following variables when determining whether or not to offer PBVs in a given year: overall voucher utilization, current voucher turnover rates, funding and budget, balancing PBV and waitlist admissions. There is no guarantee that Metro HRA will offer PBVs each year. The clarifying language also outlines Metro HRA's Request for Proposal process following [24 CFR 983.51 (b) and (c) regarding solicitation.

DISCRETIONARY CHANGE: Clarifying language.

USE OF SMALL AREA FMRs (SAFMRs) [24 CFR 888.113(h)]

The proposed change provides cleaner language that will match current procedure.

DISCRETIONARY CHANGE: Clarifying language.

CHAPTER 18: PROJECT BASED VOUCHERS (PBV) UNDER THE RENTAL ASSISTANCE DEMONSTRATION (RAD) PROGRAM

LEAD-BASED PAINT [24 CFR 983.101(c)]

The proposed change updates an additional citation for guidance [40 CFR 745.227]

DISCRETIONARY CHANGE: Clarifying language.

Civil Rights Certification
(Qualified PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 02/29/2016

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

Metropolitan Council Housing Redevelopment Authority
PHA Name

MN163
PHA Number/HA Code

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

Name of Authorized Official
Charlie Zelle

Title
Metropolitan Council Chair

Signature

Date

Attachment D
2022 PHA PLAN

Metropolitan Council

2019 Comprehensive Annual Financial Report

Fiscal Year Ended December 31, 2019

Resident Advisory Board Meeting

Metropolitan Council, Metro HRA

Metro HRA Resident Advisory Board Meeting**BACKGROUND**

| | |
|---|--------------------------------------|
| Date of Meeting | Monday, June 21 st , 2021 |
| Time of Meeting | 6pm – 730pm via WebEx |
| Metro HRA Attendees | Ryane L. and Renae P. |
| Resident Advisory Board (RAB) Attendees | 10 |

The subjects of the RAB meeting included:

- Emergency Housing Vouchers
- Small Area Fair Market Rents
- Project Based Voucher vs. Housing Choice Vouchers

The RAB was hosted virtually in following recommended guidance in response to the global pandemic CoVid-19. As a group, the members discussed implementation of the recently awarded Emergency Housing Vouchers via the American Rescue Plan, Small Area Fair Market Rents – one year later, and the prioritization of Housing Choice Vouchers versus Project-Based Vouchers.

Emergency Housing Vouchers (EHVs)DISCUSSION QUESTIONS

- What do you think about the priority groups and the anticipated referral process? How can the HRA be mindful?
- What client services are most helpful?
- PHAs will be awarded money for each allocated EHV to assist with eligible service fees. What are the most important?

RAB COMMENTS

There are so many barriers when accessing the Coordinated Entry System. Some families cannot use shelters because of disabilities, couples, service animals or pets. How will the HRA reach those households? The RAB identified many priority groups; examples included: people who don't access shelter, doubled up households, households fleeing domestic violence and elderly people sleeping outside or on transit. Members also noted that Covid-19 has impacted households currently housed because of delayed maintenance, repair, and city inspections. Members also noted that hospitals and police officers should be made aware of this program.

Housing search is critical. Persons with disabilities have difficulty locating housing that meet their needs (elevators). Other barriers to placing the voucher are accessible transportation, owners/property

managers who do not accept the voucher and understanding where to locate lists of available housing. Members said landlord incentives, financial assistance for bus cards and HRA provided housing lists would help to reduce some of these barriers.

Members shared that the Service Fee dollars allocated for EHV's should be used for paying off an old landlord because this is often faster/easier than expungement, application fees, deposits, rent and potentially assistance with cars. Members did not believe that purchasing food was the best use of Service Fee dollars because the HRA could make connections to the county or food shelves early in the voucher intake process.

Small Area Fair Market Rents (SAFMRs)

DISCUSSION QUESTIONS

- Have you moved since the implementation of SAFMRs and if so, what was your experience with the new payment standards, affordability, and the budget worksheet?

RAB COMMENTS

Members recognized that change to SAFMRs is overall positive. They specifically pointed out households new to the voucher program may find SAFMRs confusing, but that it was helpful to identify higher rent areas. Members also shared that some areas zip codes do not seem to match the localized market.

Project-Based Vouchers (PBVs) versus Housing Choice Vouchers (HCVs)

DISCUSSION QUESTIONS

- How should the HRA think about future voucher use?

RAB COMMENTS

Members overwhelmingly want to see HCVs issued to the waitlist versus PBVs. Members agreed that people who are homeless and have been on the waitlist for a long time should get help first because those who live in PBVs already have a safe place to live. The RAB also had concerns about making prioritization and access categories too specific causing extending homelessness for people on the waitlist.

Other RAB questions and comments

Members expressed continued interest in moving the meetings to another virtual platform – preferably Zoom. One member said, “If we plan to use a virtual platform in the future, WebEx is not a good one.”

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Tony Schertler, the Executive Director
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Metropolitan Council Housing and Redevelopment Authority (Metro HRA)
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the

Dakota County Consortium

Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.

The Metro HRA administers rent assistance to many special populations; including families with HIV, mental illness, homeless and veterans. The HRA is actively working to increase the housing stock for voucher holders, uses project based vouchers to gain permanent units in suburban locations and assists voucher holders in housing placement in low-poverty areas.

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

| | |
|-----------------------------|---------------------------------------|
| Name of Authorized Official | Title |
| Tony Schertler | Executive Director, Dakota County CDA |
| Signature | Date |
| | |

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, David J. Hough, the County Administrator
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Metropolitan Council Housing and Redevelopment Authority (Metro HRA)
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of
Impediments (AI) to Fair Housing Choice of the

Hennepin County Consortium

Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State
Consolidated Plan and the AI.

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| | |
|-----------------------------|----------------------|
| Name of Authorized Official | Title |
| David Hough | County Administrator |
| Signature | Date |
| | |

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Natasha D. Kukowski, the SCDP Unit Manager
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Metropolitan Council Housing and Redevelopment Authority (Metro HRA)
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of
Impediments (AI) to Fair Housing Choice of the

State of Minnesota

Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State
Consolidated Plan and the AI.

The Metro HRA administers rent assistance to many special populations; including families with HIV, mental illness, homeless and veterans. The HRA is actively working to increase the housing stock for voucher holders, uses project based vouchers to gain permanent units in suburban locations and assists voucher holders in housing placement in low-poverty areas.

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| | |
|-----------------------------|-------------------|
| Name of Authorized Official | Title |
| Natasha D. Kukowski | SCDP Unit Manager |
| Signature | Date |
| | |