

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 03/31/2024
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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, including changes to these policies, 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. The 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 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, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 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 exceed 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>MN163</u> PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2023</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 type="checkbox"/> Annual Submission <input checked="" 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. <i>The PHA Plan and attachments are available for review at www.metrohra.org. The documents can also be reviewed in person by contacting (651) 602-1428.</i></p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below)</p>
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Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program
Lead HA:				

B.	Plan Elements.				
B.1	<p>Revision of Existing 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"/> Statement of 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	New Activities. – Not Applicable				

B.3 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

PROGRESS:

- Maintained 98% utilization for the HCV program in most recent funding year.
- Received and issued Foster Youth to Independence Vouchers for 11 youth in partnership with three local counties.
- Received an additional 50 mainstream vouchers.
- Operated 150 Council-owned housing units at 96% occupancy, in partnership with Kingwood Management.
- Purchased three additional units in partnership with a local municipality to grow the agency's portfolio.
- Continue to assess operations, policies and procedures and make policy and procedural changes as needed.
- Selected to participate in the Community Choice Mobility Demonstration Program through a competitive grant application in partnership with Minneapolis Public Housing. This award will add 37 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. The Metro HRA executed MOUs with the three local Coordinated Entry systems for referrals. Eighty-five (85) EHV's are currently under contract (May VMS).
- Hosted two Service Provider trainings to inform community partners about agency programs and projects
- Opened the Housing Choice Voucher waiting list in June 2022 resulting in the placement of 2,000 new waiting list applicants.

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 owner newsletter

PROGRESS:

- Provided housing search assistance for hard-to-house voucher holders in all areas of the region, including resource-rich areas
- 91 voucherholders were referred to the Metro HRA Outreach team for housing search assistance
- Updated the existing New Owner briefing presentation to be reflective of current HRA policies and procedures.
- Conducted three landlord meetings
- Created a mitigation fund to support families who have identified financial barriers in placing their voucher. Financial barriers may include application fees, hold fees, and security deposits. This fund may also be used to support landlord retention.
- Created a formalized housing search referral and agreement form to support families in their search for housing of their choice.

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

PROGRESS:

- Selected to participate in the Community Choice Mobility Demonstration Program through a competitive grant application in partnership with Minneapolis Public Housing. This award will add 37 new vouchers to the HRA.
- Hired a Manager of Outreach & Special Initiatives to facilitate stronger community partnerships, greater landlord recruitment and retention strategies, and increased resident engagement.
- Hired two new HRA Mobility Coordinators and one HRA Leasing Coordinator to work directly with the Community Choice Demonstration.
- Added an additional HRA Outreach Coordinator to the team to support the work of resident and landlord engagement.
- Executed a Joint Powers Agreement with Minneapolis Public Housing Authority (MPHA) to support mobility throughout both jurisdictions for participating Community Choice Demonstration households.
- Developing a web-based version of tenant education to support easier accessibility for voucherholders
- Hosted a Project Based Voucher Developer listening session to gain feedback about the offer and award of Project Based Vouchers

	<p><u>GOAL: Administer programs to encourage integrated settings to provide rental assistance for persons with disabilities</u></p> <ul style="list-style-type: none"> • Administer the Non-Elderly Disabled program, providing Section 8 rental assistance to disabled families and individuals • Administer the Minnesota state-funded Housing Trust Fund program to provide rental assistance to persons who are homeless or at imminent risk of homelessness in partnership with Anoka County’s Coordinated Entry system. • 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 <p>PROGRESS:</p> <ul style="list-style-type: none"> • Continue to assist 200 non-elderly people with disabilities through Non-Elderly Disabled (NED) Vouchers. • Awarded 89 Mainstream Vouchers in 2018, 67 in 2019, 47 in 2020, and an additional 50 in 2022 to provide rent assistance for non-elderly persons with disabilities experiencing homelessness or at risk of homelessness. <p><u>GOAL: Promote self-sufficiency and stabilize families</u></p> <ul style="list-style-type: none"> • 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 • Provide PBVs in supportive housing projects • Implement harm reduction and prevention strategies to foster housing stability • Research and explore HCV Homeownership program <p>PROGRESS:</p> <ul style="list-style-type: none"> • Continue to operate Project Based Vouchers in supportive housing projects that focus on self-sufficiency. • Executed an MOU with the Homework Starts with Home Program to support housing stability initiatives with the implementation of a Move-Up preference of up to 20 vouchers per year. • Attended a National NAHRO training to further explore the implementation of a HCV Homeownership program. • Developed relationships with two established community partners that offer thorough financial empowerment and literacy trainings • Developing a web-based version of tenant education to support easier accessibility for voucherholders
B.4	Capital Improvements. – Not Applicable
B.5	<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 <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	Other Document and/or Certification Requirements.
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) 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.</p> <p>The Resident Advisory Board was asked about the impacts of Small Area Fair Market Rent implementation. No changes are being made to the PHA Plan as a result of this discussion; however, this feedback will be used when making determinations and recommendations for SAFMRs later this year.</p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p style="margin-left: 20px;">Y N</p> <p style="margin-left: 20px;"><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements. <i>See Attachment G for Challenged Elements</i></p>
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D. Affirmatively Furthering Fair Housing (AFFH).

D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>Fair Housing Goal: Increase the supply of affordable housing in high opportunity areas</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>Metro HRA employs an outreach team who regularly engage with owners in opportunity areas toward recruitment and retention. The Metro HRA works with hard to house voucher holders on housing search assistance and landlord recruitment. These activities include:</p> <ul style="list-style-type: none"> Employ an Outreach Coordinator whose purpose is to foster tenant / landlord relationships. Referral of 91 voucherholders for housing search assistance. Update of the existing New Owner briefing presentation to be reflective of current HRA policies and procedures. Conducting landlord meetings to educate landlords on program basics and dispel negative program myths. Creation of a mitigation fund to support families who have identified financial barriers in placing their voucher. Financial barriers may include application fees, hold fees, and security deposits. This fund may also be used to support landlord retention. Creation of a formalized housing search referral and agreement form to support families in their search for housing of their choice. <p>Creation of a process for expedited housing quality standard inspections for quick move ins.</p> </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>Fair Housing Goal: Ensure equal access to housing for persons with protected characteristics, lower income and homeless</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>The Metro HRA operates a Mainstream program of 203 vouchers. This program provides rent assistance to non-elderly persons who are transitioning out of institutions, at risk of institutionalization, homeless or at risk of homelessness. The Metro HRA established a partnership with the Metro Transit Police Homeless Action Team and County partners for referral and service provision. The Metro HRA Outreach Team also provides housing search assistance and assistance with overcoming barriers to success.</p> <p>The Metro HRA was awarded 218 Emergency Housing Vouchers in 2021 to provide rent assistance and service connections to people experiencing homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence or were recently homeless. The Metro HRA has Memorandums of Understanding with the three Continuums of Care in its service area for referral and service provision.</p> <p>Stabilizing people experiencing homelessness and keeping people housed are goals of these two programs successfully administered by Metro HRA.</p> </div> <div style="border: 1px solid black; padding: 5px;"> <p>Fair Housing Goal: Reduce barriers to mobility.</p> </div>
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Describe fair housing strategies and actions to achieve the goal

The Metro HRA, in partnership with the Minneapolis Public Housing Authority, was selected to participate in the Mobility Demonstration Program, Community Choice Demonstration. The program is aimed at assisting voucherholders in moving to low poverty neighborhoods that are resource rich. The program implementation date is August 2022.

The Metro HRA adopted Small Area Fair Market Rents, zip code-based rent limits, in 2020 to ensure voucherholders have access to all communities in Metro HRA's service area. Many opportunity rich neighborhoods are also higher rent neighborhoods where SAFMRs are having an impact.

Metro HRA created a fund to assist voucherholders in the payment of security deposits and application fees to ensure fast lease up and reduce landlord vacancy time.

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 §903.4)

- 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. Plan Elements. All PHAs must complete this section. (24 CFR §903.11(c)(3))

B.1 Revision of Existing 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."

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the Section 8 tenant-based assistance waiting lists. 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 (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR 5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR § 903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (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)).

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 subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) 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.

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

B.2 New Activities. This section refers to new capital activities which is not applicable for HCV-Only PHAs.

B.3 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.4 Capital Improvements. This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs

B.5 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 §903.7\(p\)](#))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on 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](#))

C.2 Certification by State of 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. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* 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 certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. 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\(o\)](#)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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 6.02 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**

2023 Public Housing Agency Plan

Attachments	Table of Contents
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Attachment D	Fiscal Year Audit
Attachment E	Resident Advisory Board (RAB) Comments
Attachment F	Form HUD 50077 SL, Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan
Attachment G	Challenged Elements

**2022 Administrative Plan,
Housing Choice Voucher Program**

Is located on the PHA Website:

[2022 HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN \(draft\)](#)

metro council.org

**The Summary of Changes provides an overview of the recommended, red-lined changes to the
2021 Housing Choice Voucher Administrative Plan**

Chapter 2: FAIR HOUSING AND EQUAL OPPORTUNITY

2-II B. Definition of Reasonable Accommodation [Fair Housing Act (42. U.S.C.)]

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

DISCRETIONARY CHANGE: Clarifying language

2-II D. VERIFICATION OF DISABILITY [Fair Housing Act (42. U.S.C.)]

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

DISCRETIONARY CHANGE: Clarifying language

Chapter 3: ELIGIBILITY

3-I.M. LIVE IN AIDE [24 CFR 5.403]

The proposed policy language updates recommended language from the Nan McKay Fair Housing and Reasonable Accommodation Guidebook.

DISCRETIONARY CHANGE: Clarifying language

CHAPTER 4: APPLICATIONS, WAITING LIST AND TENANT SELECTION

4-III.B. SELECTION AND HCV FUNDING SOURCES [24 CFR 982.204(e)]

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

DISCRETIONARY CHANGE: Clarifying language

4-III.C. SELECTION METHOD [24 CFR 982.207; HCV P. 4-16]

The proposed policy updates language developed as a participating site in the HUD-funded Community Choice Demonstration program.

DISCRETIONARY CHANGE: Clarifying language

CHAPTER 9: GENERAL LEASING POLICIES

9-I.B. REQUESTING TENANCY APPROVAL [FORM HUD-52517]

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

CHAPTER 11: ANNUAL RECERTIFICATIONS

11-I.B. SCHEDULING ANNUAL REEXAMINATIONS

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

CHAPTER 17: PROJECT-BASED VOUCHERS

17-VII.C. MOVES, OVERCROWDED, UNDER-OCCUPIED, AND ACCESSIBLE UNITS [24 CFR 983.260]

The proposed change corrects the citation for reference.

CORRECTION

**Certifications of Compliance with
PHA Plans and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

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

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including
Required Civil Rights Certifications**

Acting on behalf of the Board of Commissioners of the 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 ___ 5-Year and/or X Annual PHA Plan for the PHA fiscal year beginning 01/01/2023, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan 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.
6. The PHA will affirmatively further fair housing by examining their 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 work 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.
7. For PHA Plans that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. 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.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Metropolitan Council Housing and Redevelopment Authority
PHA Name

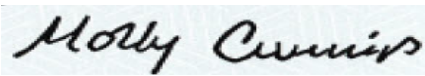
MN163

PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 2023

 5-Year PHA Plan for Fiscal Years 20 - 20

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 Molly Cummings	Title Acting Board Chairperson
Signature 	Date 11/17/2022

Metropolitan Council, Metro HRA

[Annual Comprehensive Financial Report \(metro council.org\)](http://metro council.org)

Fiscal Year Ended December 31, 2021



Metro HRA Resident Advisory Board Meeting

BACKGROUND

Date of Meeting	Thursday, July 14 th , 2022
Time of Meeting	1:00 pm – 2:30 pm via Zoom
Metro HRA Attendees	Caitlin Magistad, Sonja Marquez, Margaret Perez, Stephanie Paulson, Terri Smith, Chong Lao, Tammy Wiger, Ryane Ottengheime-Leifheit, Colleen Wallin, Tasha Belshan, Brenda Pierson
Resident Advisory Board (RAB) Attendees	18

The subjects of the RAB meeting included:

- Housing Search & Rent Limits
- Communications & Office Hours
- Homeownership & Other Wealth Building Opportunities

The RAB was hosted virtually following recommended guidance in response to the global pandemic CoVid-19. As a group, the members discussed housing search and affordability rates, Metro HRA communications, office hours, home ownership, and wealth building opportunities.

Housing Search and Rent Limits

DISCUSSION QUESTIONS

- What has your housing search been like?
- Have you been able to find units that meet using Metro HRA’s current payment standards? Are affordable units in your preferred areas?
- What barriers have you faced in your housing search?

RAB COMMENTS

Attendees are overwhelmed with housing search and want to give – they are unable to locate an affordable property, in their preferred area that will accept the Housing Choice Voucher. Attendees expressed being stereotyped and faced with challenges even when they have a pristine rental record and no criminal background. Local housing search engines like Housinglink tend to have outdated listings that are no longer available to rent. Attendees also detailed difficulty with finding housing when they attempt to port their voucher to other service areas and that some landlords refuse to work with Section 8.

Payment standards do not align with the current rental market. Attendees stated that many of the unit rents in their preferred locations are over the Metro HRA’s payment standards. There were reports that property managers will increase the requested rent when they learn that affordability standards have increased. Attendees mentioned they fear rent increases could potentially push their rent so high that

they will no longer be able to afford living in their unit which will force them to vacate and into housing search. Attendees also shared stories from landlords that they used to work with the program, but that the rent limits are now too low to support the contract rent for their unit(s). Households are unable to locate units in their preferred location so are now searching in less desirable neighborhoods. Rent increases have limited options for Section 8 program participants.

Attendees shared some of the reasons they believe landlords are unwilling to participate in the program:

- Lack of knowledge about the program
- Bias
- Prior negative experience with a Section 8 tenant
- HQS inspection requirements

Attendees shared a variety of barriers in placing their Housing Choice Voucher:

- Poor rental/credit history
- Stringent income requirements at properties
- Additional landlord lease fees
- Security deposits: First and last month rent
- Landlords requesting additional money from prospective tenants to cover the gap between the HRA housing assistance payment and tenant paid portion
- Negative connotation/rhetoric against the Section 8 program
- Landlords no longer accepting Section 8 due to the perceived loss in rents they experienced during the pandemic and peacetime emergency tenant protections
- Landlords are unwilling to wait for security deposit payments – they require that the application fee(s) and security deposit be collected at the time a prospective tenant applies for a property

Attendees suggested the following options to improve securing housing:

- Letter of guarantee for landlords so landlords who are new to the program better understand it
- Advocacy for participants that are experiencing barriers
- Landlord education
- Cultural sensitivity training for landlords
- Provide participants with documentation that makes them marketable to the property owner
- Increased Metro HRA payment standards
- Streamline the county's Emergency Assistance process for assistance with security deposits
- Accessible HRA funds to cover the cost of application fees and security deposits (if not eligible for Emergency Assistance)
- Provide tenants with basic information about the mandatory HQS inspection so they can provide it to prospective property managers/landlords

Communications & Office Hours

DISCUSSION QUESTIONS

- How are your needs being met when you need to get a hold of your Coordinator when you have an issue or question?
- How important is in-person support vs. virtual options that have emerged during COVID?

- Assistance Connect: How is it working?
- How can we make it better?
- What has been your experience with the online system related to inspections?

RAB COMMENTS

Participants stated that Assistance Connect is not user friendly and does not allowing them to send messages to their coordinator easily. It is difficult to locate forms and to upload documents.

Homeownership & Other Wealth Building Opportunities

DISCUSSION QUESTIONS

- How easy or difficult do you think it would be to become a homeowner?
- What barriers to homeownership do you have that Metro HRA may be able to help address?
- What other goals do you have for your family related to your finances or building wealth?

RAB COMMENTS

Participants expressed interest in home ownership programs and would like to see Metro HRA develop a program in the future. Resources for homeownership programs were requested.

Attendees identified the following barriers to homeownership:

- Down payment
- Credit score for mortgage qualification requirements
- Income requirements for mortgage qualification requirements
- Funding for maintenance issues that may arise after purchasing a home

**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

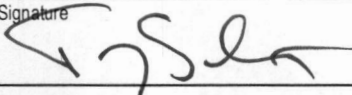
Dakota County Consortium
Local Jurisdiction Name

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
	6-29-22

**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
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Name of Authorized Official	Title
Natasha D. Kukowski	SCDP Unit Manager
Signature	Date
<i>Natasha D. Kukowski</i>	10/13/2022

Metropolitan Council, Metro HRA

The attached letters were submitted as Challenged Elements to the Metro HRA Project Based Voucher policy in the Administrative Plan. No Plan changes were made as a result of the challenges.

Metro HFA 2023 Administrative Plan
Public Comment by Kathryn Lamp
August 15, 2022

Council Members,

My name is Kathryn Lamp and I am a member of Olivet Congregational Church in St. Paul. I am here today to urge you to implement a coordinated policy that assures a generous and reliable supply of project-based housing vouchers every year. Non-profit developers, like Beacon Interfaith Housing Collaborative, need these vouchers in order to build homes for very poor families whose income is less than 30% AMI – average median income.

Before retirement I worked in public health care programs and social services. I came to know and value the importance of stable housing to achieve life goals for employment, education and health. Stable housing is a key investment strategy for our lowest income families and children that is ultimately a cost savings strategy for our public dollars.

I am excited that Beacon has begun working on Gladstone Crossing, a 40-unit project in Maplewood that will provide deeply supportive housing for young families. This project will not get built without project-based vouchers from Metro HRA. These young families want to live in the Maplewood community, work in that community, bring their kids to school in that community, benefit from the supports of that community. Maplewood and other suburban communities cannot, on their own, meet the projected need for deeply affordable housing. In the last ten years, Maplewood has built only seven of these deeply affordable units.

The Met Council has published goals for affordable housing development for the region and for communities. A steady and reliable stream of project-based vouchers is an important and necessary tool towards meeting these goals. Without project-based vouchers, non-profit developers cannot secure the capital necessary to build new projects like Gladstone Crossing for our lowest income families and children across the entire region. Project-based vouchers are the keys that unlock affordable housing in suburban areas.

Please amend your HRA plan to include a clear policy that will assure the regular availability of project-based vouchers throughout the whole metropolitan area every year.

Thank you.

**MET Council Testimony
15 August 2022
Beacon Interfaith Housing Collaborative**

Good afternoon,

My name is Mike Elliott and my congregation, the Unitarian Universalist Church of Minnetonka in Wayzata, MN is a member of the Beacon Interfaith Housing Collaborative.

I'm here today to speak on the MET's policy of not prioritizing awarding project-based vouchers for communities with their own housing authorities. I understand the temptation to do this. Why provide vouchers to those communities that have their own housing authorities?

One of the reasons to reconsider this policy is I believe that as a regional planning body it limits your important role in helping to create deeply affordable housing throughout the entire region. In my work with Hennepin County last year, they stressed that deeply affordable housing is needed everywhere.

Another is that our suburbs aren't able to create the deeply-affordable homes they need to succeed because of the lack of resources like project-based vouchers. Smaller housing authorities just don't have the number of vouchers to do it on their own.

For example, the Richfield housing authority has a total of 232 vouchers. If they project based all they are allowed by HUD, they could project base 46 of them. Your MET Council estimate states that in the next ten years they will need 284 affordable homes at 30% AMI. On their own the city has produced zero affordable units at 30% AMI in the last ten years. They need your support.

I am working with Beacon to change that. I have been helping to create Aster Commons in Richfield, which when completed will provide 35 units affordable to 30% AMI of supportive housing to neurodivergent youth. This is one of the priority populations identified by Hennepin County.

At our announcement of this development earlier this year, we were joined by the Mayor of Richfield - the Honorable Maria Regan Gonzalez whose enthusiastic support along with the rest of City Council will help to see this project completed.

Beacon needs a partnership approach that leverages your resources and the local areas to make these developments possible. With Aster Commons we have the support of the local community now we need yours.

The prioritization away from helping those communities with housing authorities hurts not only them but our region as a whole. We are all affected but the impact falls hardest on BIPOC families.

Project-based vouchers are key to keeping families in their communities, helping us to live out our values and creating a metro area that works for all of us.

What I recommend is a commitment to prioritize partnering with local housing authorities to create deeply affordable housing even in areas with an HRA or CDA.

With your assistance, in Plymouth the collaboration between the local housing authority contributing 10 project-based vouchers along with the Metro HRA's 10 allowed Cranberry Ridge to be created with units affordable at 30% AMI. Families are now living in these homes and so much more is possible if you mirror this model.

We hope that you can create a policy to provide project-based vouchers throughout the entire seven-county area and partner with regional HRA/CDAs to make deeply affordable housing possible.

Sincerely,

Michael D. Elliott
15453 Boulder Creek Drive
Minnetonka, MN 554345



Section I: Overall Response

Beacon believes all people should be able to live in the communities they call home. Low-income families in the suburbs, especially those at or below 30% AMI, are increasingly unable to find homes they can afford. According to the Met Council's own reports, only 163 new units were created at the 30% AMI level in the last ten years, while more than 18,000 such units will be necessary over the next ten years. At this rate, the Met Council will never achieve its affordable housing goals.

Moreover, the Met Council centers equity as a fundamental value in its 2040 plan and claims its leadership role in advancing equity throughout the region. But according to its published reports, the Twin Cities metro has the largest housing disparities among the 25 most populous metro areas in the US.

Section II below details specific points in the Metro HRA plan, but Beacon's response boils down to one overarching concern: **the 2023 Draft Administrative Plan will "lock in" the housing scarcities and disparities that currently exist, because it doesn't include a clear policy from the Met Council for the strategic utilization of project-based vouchers.**

Project-based vouchers are the keys that unlock both housing availability and equity. Tenant-based Housing Choice vouchers only offer a "choice" for 30% AMI households to live where deeply-affordable rental options already exist. Suburban families that receive tenant-based vouchers often have no choice other than to move to the central cities to find housing they can afford. Tenant-based vouchers don't create new housing availability -- but project-based vouchers do.

Project-based vouchers are integral to the financing that makes affordable housing possible. In order to be awarded the capital necessary to build a multi-million-dollar project, non-profit developers must first secure a project-based voucher for each deeply affordable unit planned. Metro HRA has the largest allocation of Housing Choice Vouchers in Minnesota and could use a sizable portion of them strategically, as project-based vouchers, to help meet its affordable housing goals.

Beacon Interfaith Housing Collaborative respectfully requests that the Met Council create and implement a clear Project-Based Voucher Policy to be administered by Metro HRA that:

- A. sets goals of making 20 percent of its vouchers available for project-based assistance over time, with an additional 10 percent set aside, as per HUD policy, for deeply-affordable housing in low poverty communities;
- B. makes Metro HRA project-based vouchers available for the creation of 30% AMI housing in low poverty suburban communities, whether or not those communities have their own small housing agencies;
- C. coordinates its annual schedule for announcing and awarding project-based vouchers with MN Housing's RFP process, to assist developers in securing the necessary capital to create deeply-affordable housing;
- D. instructs Metro HRA to publish an annual report detailing its project-based voucher program goals and awards.

By failing to create and implement a policy that provides a generous and reliable supply of project-based vouchers throughout the region, the Met Council has impeded its own affordable housing goals and created a systematic barrier to housing equity. We urge the Met Council to use its power to expedite the development of deeply affordable housing where it's most needed, by creating a clear project-based voucher policy.

Section II: Detailed Comments

1. *PHA Policy: The PHA will not set aside units above the 20 percent program limit. (17-3)*

Comment: HUD authorizes PHAs to use an additional 10% of their Housing Choice Vouchers for PBVs that (a) assist veterans or people experiencing homelessness, (b) are located in properties that provide supportive housing to older adults or people with disabilities, or (c) are located in areas where the poverty rate is 20% or less. All of these goals align with the Met Council's Thrive 2040 plan and would increase housing equity in the greater Twin Cities area. We believe that Metro HRA should be taking advantage of this HUD program guideline by making up to 30% of its vouchers available as PBVs for deeply-affordable supportive housing in low poverty areas.

2. *PHA Policy: There is no guarantee the PHA will offer PBVs each year. (17-3)*

Comment: Unless PBVs are offered on a regular annual basis, in accordance with a clear policy imperative, non-profit developers will not be able to do the long-term planning and secure the capital funding necessary to build deeply-affordable housing where the need is greatest. The lack of a guarantee that PBVs will be offered annually creates a systematic barrier to housing equity.

3. • *The PHA may issue an RFP prior to Minnesota Housing's RFP process.*
• *The PHA will take no action on PBV requests until Minnesota Housing has made its funding awards.*
• *If Minnesota Housing does not approve the other financing requested to make the project financially feasible, the PHA will not consider the request for PBVs and a developer will need to reapply for PBVs at a later date when PBVs are again offered. (17-6)*

Comment: Deeply-affordable housing projects that have already been awarded the necessary PBVs are far more likely to receive funding in MN Housing's RFP process. By not offering PBVs on a regular annual basis, and not awarding PBVs until after MN Housing's RFP process, the Met Council is creating a systematic barrier to housing equity by preventing these projects from moving forward, often for years.

4. *The PHA will prioritize PBV projects located in it's (sic) own operating area prior to considering projects out of its jurisdiction. The PHA's operating area includes Anoka and Carver Counties and suburban Hennepin and Ramsey Counties, excluding the cities of Minneapolis, St. Paul, Bloomington, Plymouth, Richfield and St. Louis Park. (17-7)*

Comment: This policy locks housing inequity in place in suburban communities with their own housing agencies. Smaller municipal and county agencies don't have enough Housing Choice Vouchers to

“spend” them on deeply-affordable multi-family developments. If 30% AMI housing is going to be created in these areas, it will only be because Metro HRA provides the PBVs.

5. *PHA Policy: It is the PHA goal to select sites for PBV housing that provide for deconcentrating poverty and expanding housing and economic opportunities. In complying with this goal the PHA will strive to limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less. (17-13)*

Comment: The language here is confusing. It appears that Metro HRA is trying to say it will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or MORE-- meaning it will ONLY approve sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less. As written, the sentence directly contradicts the statement that precedes it, as well as the Met Council’s stated equity goals.