

MTW Cohort #2 Rent Reform
Dallas Housing Authority Draft Plan

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Version 1.0

This is a copy of the draft MTW Cohort #2 Plan application DHA intends to file with HUD by January 8, 2021. The draft plan is organized based on HUD prescribed format found in Notice PIH-2020-21, Request for Applications under the Moving to Work Demonstration Program for Fiscal Year 2020: Cohort #2 Rent Reform.

DHA is actively conducting community meetings and receiving feedback from its residents, and key stakeholders as it develops the MTW Plan. DHA may modify this draft MTW plan to in response to written comments received. As such this draft plan may be updated between now and January 8, 2021. DHA post all updated versions of this draft on its website. Additionally, DHA may make edits to the narrative to provide clarifying and/or additional information to more completely respond to HUD questions or as necessary to meet other HUD requirements.

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MTW Plan

Vision for PHA's Local MTW Program

Dallas Housing Authority is pleased to submit its application and plan to participate in the HUD Moving to Work Program. DHA passionately support the MTW Program and commends HUD for developing an evidenced based initiative as the basis for housing program reform.

DHA's MTW Program Vision Statement:

To apply and research cost effective, evidenced based policy/strategies by combining Rent Reform and Housing Choice that places our families in the best possible position of escaping the debilitating effects of generational poverty.

How do we realize this ambitious Vision?

In 2018 DHA launched a series of strategic initiatives to effectuate the aforementioned vision. A cornerstone is a paradigm shift in the relations value we have with our applicants and clients. In 2018, DHA launched a series of strategic initiatives to effectuate the aforementioned vision. A paradigm shift in the relationship value with applicants and clients is critical to affecting meaningful long-term change in outcome. In the administration and delivery of our nation's affordable housing services, agency-client relationships center on bureaucratic process determinations of eligibility and regulatory compliance. Agency communications solicit answers to questions such as: what is your source of income; how many people are in our household, complete your annual recertification or you may lose your housing assistance, etc. These conversations, though necessary to effect regulatory compliance, minimize a PHA's ability to assist the family in their unique needs and life goals. In the limited time agencies spend with each family it would be more beneficial for clients to be served by life coaches helping families

attain their aspirational goals rather than rent setting enforcement officers. In-depth conversations may materialize focusing on client self-sufficiency such as: how is your job / job search going, we can help you obtain additional job skills, how are your children doing in school, we can help you with services that match your unique needs, and can we help you with your housing search, let's research some neighborhoods that are closer in proximity to your job or better schools for your children. Due to the imbalance in situational conversations [80% bureaucratic - 20% self-sufficiency], families are less likely to discuss their true needs. Through rent reform, DHA would like to invert this equation to spend 80% of our conversions with families related to their self-sufficiency and 20% related to and administrative bureaucratic requirements of the program. We believe this change will create more meaningful agency-client relationships and ultimately help more families achieve financial independence. To help facilitate this new relationship value with our clients, DHA has already embarked on some major foundational strategies, using technology to increase efficiency and productivity, developing internal capacity to create evidence-based policies, developing programs to increase housing choice, these steps and others will allow for the redeployment of existing personnel to spend more time focused on helping client families escape the cycle of generational poverty.

Technology

DHA is on the cutting edge of how it is utilizing technology to increase productivity, enhance operational efficiency, automate workflow processes, allow remote access to programs and services, track individual family as well as aggregate demographic, geographic, data to evaluate need, test and analysis of data for intended as well as unintended outcomes, create evidenced based policy/programs, etc. Here are a few examples of how technology is emerging with increasing value-added outcomes. *Yardi, Voyager 7s* is the management platform DHA utilizes

for its affordable housing programs. In 2020, DHA launched the elements of Yardi’s Rent Café which allows families to complete recertifications and other changes through the internet. DHA employs 42 FTEs that complete this work. As a result of the employment of this technology DHA can repurpose a segment of its existing work team to serve as Mobility counselors without the agency incurring incremental payroll expenses. This technology has also created efficiencies in staff processing time. While the Yardi software provides excellent functionality in program administration DHA needed an equally functional software platform to track quality of life services for program participants. DHA incorporated a solution strategy found in the private market, i.e., Customer Relationship Management (CRM) software. DHA utilizes the “Zoho” CRM system. Zoho allows the user to track client needs, automate and route various flows, manage large data both at individual client record and aggregate level. DHA successfully benefited from using Zoho in its Children First North Texas (CFNTX) mobility counseling initiative; its delivery of CARES Act Temporary Rental Assistance; its COVID-19 Wellness Check initiative, and its economic job development initiative for Chime Solutions. Zoho CRM capabilities played an important role beneficial to lower income households in each of these initiatives. DHA is also incorporating the utilization of artificial intelligence into its operational processes. DHA and BoodsKapper, a Dallas based tech firm, designed and implemented an App that addressed inefficiencies in DHA’s HQS housing inspections process. Prior to the creation of the “InspectionMate” App, HQS inspections were scheduled manually by DHA staff with communications occurring primarily by posted mail. DHA’s housing inspection process was transformed from a programmatic weakness into a strength as the app manages HQS inspections appointment scheduling and re-scheduling in real time, communicates appointment schedules to clients through SMS messaging or email, conducts route optimization for the inspector, and

sends “Uber”-like messaging to clients who can now know exactly when to expect the inspector to arrive at their unit. Inspection results are also transmitted to clients - same day. These represent just a few of the technology-based initiatives that DHA has accomplished to date with more in development. The tech advances have created operational efficiencies which allows DHA to train and repurpose its workforce to focus on client self-sufficiency.

DHA has used this system in the launch several new DHA program initiatives: Children First North Texas (CFNTX) mobility counseling initiative; CARES Act Temporary Rental Assistance, COVID-19 automated Wellness Check initiative and an economic job development initiative, Chime Solutions. All of these programs and the impact of the CRM system played will be described more fully later in the application. DHA is also incorporating artificial intelligence into its operational processes. DHA teamed with a local boutique tech firm to design and implement an application that addressed an inefficient process of scheduling and performing HQS inspections. Prior to the advent of “InspectionMate” HQS inspections were scheduled manually by DHA staff and required a two-week lead time prior to the inspector conducting the inspection. This weakness is now a strength as the app handles the scheduling of the HQS in real time, sends SMS messaging to the landlord and client to inform them of the scheduled inspection, prepares the route for the inspector and sends messaging similar to Uber application that allows customer to see the inspector in route. These represent just a few technology initiatives that DHA is using to increase operational efficiency which allows DHA to retrain and deploy human capital resources in self-sufficiency type roles.

Formation of Policy Development & Research (PD&R) Dept.

In 2019, DHA established a Policy Development and Research (PD&R) department responsible for developing evidence-based strategies to combat segregation and poverty, foster upward

mobility, and enable system-wide operational improvements. Since its inception, DHA’s leadership and PD&R team have designed a series of pilots intended to generate empirical evidence about the relative success of various strategies to create pathways to self-sufficiency through relocation, education and mobility counseling, employment opportunity, and connection with supportive services.

Housing Choice/Mobility Counseling

Research has shown that one of the signal most important indicators in the probability of families breaking the generational poverty cycle is the decision of where to live. In Dallas, as with many other PHAs, HCV families tend to live in high poverty under resourced areas which ultimately stifles their economic growth and development. While some third-party organizations provide mobility counseling for families, DHA believes it critically important to earn a deeper level of trust with the families we serve and to take an active role in the process. In January 2020 DHA launched its *Children First North Texas (CFNTX)*. The purpose of CFNTX is to educate existing HCV families living in Racially/Ethnicly Concentrated Areas of Poverty (R/ECAP) on the importance and impact of housing choice. This program is more fully described in section ###.

Creating Moves to Opportunity Expansion (CMTOx)

In 2020, DHA was selected to be one of three housing agencies in the nation to participate in Opportunity Insights (OI) academic research related to benefits of HCV families residing in high opportunity neighborhoods. DHA and OI are currently drafting the study questions and addressing barriers associated with moving to high opportunity areas. For families to be successful, DHA is designing a direct case management program to assist families in their pursuit of economic independence. We believe this is key component to couple with rent reform

Unique Challenges

The Dallas-Fort Worth region accounts for some of the country's most severe rates of neighborhood inequity, child poverty, and patterns of segregation. And the families *High % of families between 0 – 10% AMI, 1 in 4 children in Dallas grow up in poverty, cost of Small Area Fair Market Rent, HAP Budget Authority, Geographical Operational Area, Lack of regional mass transit, availability of affordable housing, tight DFW rental market, Lack of Mobility Counseling % HCV families living in RECAPs, Texas Legislature.* The Dallas-Fort Worth region accounts for some of the Country's most severe rates of neighborhood inequity and patterns of segregation, and HCV families disproportionately reside in these highly segregated neighborhoods. The implementation of our proposed MTW policy, which is designed to incentivize relocation to high-upward mobility neighborhoods, is a propitious opportunity to address these growing patterns of segregation and associated low likelihood for upward mobility. DHA also acknowledges that the current location in which HCV families reside is greatly affected by market constraints, landlord participation, limited access to neighborhood information and a limited family support system- among others. To address these barriers, DHA is advancing its application inclusive of proactive and integrated case management services to remove barriers to housing choice, incentivize landlord participation and support employment engagement. Managing these and other challenges both known and unknown will be an important element of the program's success. We approach this work with the mindset that challenges are meant to be overcome/solved.

Unique Opportunities that participation in MTW would bring

DHA possess both the professional as well as programmatic set of unique attributes that will bring quantifiable results in the implementation of the MTW program. DHA team members offer

a professional discipline that will ensure the MTW program is well designed and implemented.

DHA’s affordable housing programs are large, complex and diverse in scope which lend itself nicely to drawing national parallels. Below are some unique attributes DHA brings to the table if we are fortunate enough to be selected by HUD to participate in the MTW – Cohort #2 Rent Reform. DHA’s HCV program scale, size & complexity 19,000 unit baseline, 100 FTEs, \$220 HAP annual budget; DHA’s Geographic operational jurisdiction serves seven (7) counties with diverse housing markets, and political landscape will be good barometer for HUD to assess national relevance; DHA’s Small Area Fair Market Rents (SAFMR) – DHA has successfully operated with more than 600 payment standards (since 2010); DHA’s operational paradigm shift –DHA uses technology to improve efficiencies, to enable team members to spend more time with clients in conversations about economic self-sufficiency; DHA’s investment in & use of technology of Artificial Intelligence (AI), and Customer Relations Management software (CRM); DHA team members. Leadership represents cumulative ## years of experience in affordable housing; DHA’s Organizational strength: to oversee design, implementation, oversight, program evaluation and reporting; PD&R Dept– aid HUD and third party in research; DHA’s Performance Single Audit/ finding free past 9 years, No Findings for past 9 years; High Performer 6 consecutive years

Replicable Program design: Inspection Mate; CFNTX – Mobility Counseling, CARES Act – Temporary Rental Assistance, Chime Solution - Redbird Mall employment development, progressive in design, data driven and evidenced based described in section ###. DHA’s Community Engagement of Business Partners in High Opportunity areas; Concentration of families in RECAP measure impact of program objectives, Large pool of eligible participants; Fertile Labor Market, DFW labor market is outperforming national trends.

Why do we want to participate?

Low-income households including HCV participants have been denied equitable access to community services and resources for far too long. People in poverty have been marginalized and regulated to live in neighborhoods that have suffered from decades of blight which research has proven they are not likely to escape. As a nation and a community, we are only as strong as our weakest link. DHA has direct access to many of these families and a responsibility to engage them in a more transformative manner. We believe PHAs can assume a more meaningful role in helping clients break the poverty cycle. Creating and testing new policy at the intersection of rent reform and housing choice will help more families break the devastating effects of generational poverty.

Description of Experience and skills of the PHA personnel with primary responsibility for the administration of the MTW Plan.

DHA has the organizational capacity to effectively and efficiently administer the MTW program. DHA has 310 team members delivering affordable housing solutions to more than 55,000 persons on a daily basis. DHA’s HCV program serves more than 16,000 families with annual Housing Assistance Payment (HAP) budget authority of \$190M. In the administration of the HCV program, DHA has earned HUD’s most prestigious rating, *“High Performer” designation for 5 consecutive years*. DHA has received finding free *Single Audits since FY-2013*. DHA will bring this same professionalism in the administration of the MTW plan. The table below provides lead departmental responsibilities as it relates to some of the major MTW objectives.

Major Objective	Lead Dept/s.				
	Executive	PD&R	HCV	Finance	Compliance
Community Engagement					
Research & Evaluation					
Program Design					
Policy & Procedure					

Staff Training					
Program Reporting					
Internal Reviews					

Beyond the operational framework, DHA has a compassionate mission focused team of professionals that will lead the MTW work. Collectively the leaders represent more than ## years in the affordable housing industry.

Leading & Representing the Executive team: Vision/Resource Allocation

Troy Broussard, CEO 27 years in the affordable housing industry all with DHA, will provide program vision; David Zappasodi, COO/SR VP, 43 years of experience, will be responsible for the day-to-day MTW operations oversight.

Leading & Representing PD&R Team: Research/Policy Design/Evaluation/

Dr. Myriam Igoufe served as a lead researcher in the Affirmatively Furthering Fair Housing study for North Texas, with 21 municipalities and housing agencies representing the largest consortium in the country. Dr. Maggie Deichert and William Sanders have expertise in program design, research evaluation, technology development & deployment that can aid HUD

Leading & Representing HCV Team:

Brooke Etie, LCSW, Vice President of Voucher programs, has 14 years of experience, leads a team of 100 professionals. responsible for implementing MTW program operations training staff

Leading & Representing Finance Team:

Chetana Chaphekar, CPA, 30 years’ experience in the affordable housing industry. Will lead team in financial controls & reporting and IT management

Leading & Representing Compliance Team:

Jeni Webb, Director of Compliance, former HUD official. responsible for drafting policy/procedural documents, staff training and internal reviews to ensure compliance with MTW program requirements and DHA policy/procedure.

Statements of fair housing and other civil rights goals, strategies and specific actions

DHA certifies it will carry out the MTW program 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 I 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 implements in a reasonable fashion in view of 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 record reflecting these analyses and actions.

Plan for Future Community/Resident Engagement

Our initial program design is to actively listen our residents and community to gain understanding. In the midst of the COVID-19 pandemic, DHA has and will continue to solicit input through a variety of communication platforms including but not limited to: virtual digital meetings, administer surveys, website postings, newsletters, email campaigns, etc. In the application process. We have sent out 6 different MTW campaigns - with 3 to 5 emails per campaign, 2 email campaigns that include electronic surveys. The first to capture our residents' attitudes on the current rent structure and the second to capture their attitudes and preferences about the rent reform plan; 3 additional email campaigns, hosted 4 webinars for all HCV residents, conducted two surveys and are in the process of conducting an additional survey,

totaling 3 surveys. The first survey captures residents' attitudes towards the current rent structure in place. 3,896 residents completed this survey. 2,688 eligible HCV residents completed this survey out of 8,529 HCV residents - which is a response rate of 32% of our MTW eligible population. This population has been the primary target of our survey focused outreach. The second survey was a live, interactive survey for those who participated in the two HCV resident-only webinars. A total of 250 individuals completed this survey across two meetings.

DHA will continue the use of these and other communication channels during the planning and implementation phases. Additionally, DHA is organizing a *MTW Advisory Committee*. The MTW Advisory Committee will be comprised of key private and public sector partners as well as clients. The purpose of the MTW Advisory Committee will be to review proposed MTW policy, make recommendations and provide direct services to augment the MTW plan. The MTW Advisory Committee shall meet no less than quarterly during the MTW Planning process. DHA is also receiving written comments regarding its MTW Plan, responses to those comments will be included in Part II of the application.

PHA Operating and Inventory Information

DHA provides affordable housing solutions to over 20,000 households across seven North Texas counties: Collin, Dallas, Denton, Ellis, Kaufman, Rockwall, and Tarrant, and proudly supports 55,000 individuals. DHA owns and operates 4,903 rental housing units in 27 developments, 3,155 are public housing units. DHA's public housing and housing voucher programs combined consists of 50% seniors or persons with disabilities; 87% African American, 82% female-headed households, and 48% are families with dependent children. The average household income is \$12,011 and the average tenant rent is \$221. DHA's Public Housing residents are 80% female-

headed households, 22% of households include persons with a disability and 18% are seniors. The Housing Voucher program serves about 16,500 households, of which 83% are female-headed households, and 23% are persons with a disability and 28% are seniors. The average household income is \$15,121 and the average tenant rent is \$186. DHA believes the average income of its participants has decreased due to the economic impact of the COVID-19 pandemic. DHA offers a large sample size for the implementation of the MTW Demonstration program. DHA counts approximately 8,328 families who are potentially eligible to participate in Rent Reform study (6,758 HCV and 1,570 public housing).

Examples of PHA demonstrated innovation and creativity within its current programs.

Brokering Employment Opportunities for DHA families: The case of Red Bird Mall

Overview: A major employer expanding into the Dallas marketplace created over 400 jobs to be filled in the Southern sector of Dallas. DHA’s PD&R department launched a series of analyses, outreach instruments, and negotiation sessions with the recruiting agency to identify competitive candidates within its HCV population. Upon reviewing the report presented by PD&R, the recruiting agency, one week prior to the public job fair open to the general public event, set up 80 interviews for DHA candidates only. DHA candidates were able to interview in a one-on-one setting, on a dedicated appointment time slot at a nearby community college facility, with some candidates offered a job the same day. Early recruiting strategy efforts have given DHA participants a competitive advantage while building a tangible fast-track for them to engage in the marketplace. [Full Description here \(link\)](#)

Housing Choice & Upward mobility: Children First North Texas Program +CMTOx

In 2020, DHA launched a program named “**Children First North Texas**” (CFNTX) focused on families with children living in the most impoverished and segregated neighborhoods in our region. The CFNTX program is designed to systemically assist families with children in segregated neighborhoods to relocate to high-upward mobility neighborhood through personalized mobility counseling and automatic matching with social service providers, and financial incentives. More recently, and in partnership with Harvard University’s research group Opportunity Insights, DHA has been selected as a CMTOx site to expand experimental testing of mobility counseling-focused administration models. [Full Description here \(link\)](#)

Wellness Check Assessing & Mitigating Food/Medicine Insecurities COVID-19 Pandemic

Background: Like many other communities in the country, Dallas has experienced the effects of the COVID-19 pandemic. As a result, DHA launched a wellness check initiative for public housing residents to assess their immediate needs, provide resource referrals, and monitor the residents’ needs on a continuous and ongoing basis during the pandemic. The wellness check outreach prioritized at-risk families and sought to assess food and/or medicine insecurity, as well as perceived exposure to COVID. Accordingly, as data was captured DHA worked in brokering services and making referrals to address these challenges.

Self-Sufficiency Programs at DHA

Fostering self-sufficiency and enhancing the welfare of low-income communities is at heart of our organization’s mission. Indeed, for more than 30 years, DHA has long invested in the administration of self-sufficiency programs notably through its Family Self-Sufficiency (FSS) program and Resident Opportunity and Self-Sufficiency (ROSS) and continuously gathers community feedback from its residents to assess community needs and inform the development of operational strategies to meet these needs. DHA is leveraging its technological capabilities to

outreach to its resident in a targeted way (based on the nature of the communication, eligibility, or again location), in an effort to meaningfully engage its families, assess needs and preferences, to inform operational investments and design operations.

Leveraging Tech and Advanced Analytics to Incorporate Mental Health into Housing Operations

DHA has applied to the 2021 Texas Health Community Impact Grant to address such behavioral health impediments, and DHA’s application is now in the final stages of award selection.

Through this grant, DHA seeks to develop technological infrastructure to support large-scale, cross-sector collaboration, supporting industry-wide operational shifts, effectively fostering and streamlining access to a wide array of behavioral health services for chronically under-resourced communities. The projected workflow will be designed to not only assess behavioral health needs, but also assess needs related to other social determinants of health (i.e. food, education, transportation...) and provide a seeker a tailored, automated set of recommendations (matching system based on household information and providers’ area of service, eligibility, requirements, and so forth).

Plan for Local MTW Program

DHA’s MTW Demonstration program is intended to foster self-sufficiency by supporting housing choice and incentivizing employment engagement for families to increase earnings and improve their quality of life. The ways in which our agency intends to leverage the provisions of the MTW program to meet community needs can be organized along two axes: through (1) operational shifts and restructuring and (2) programmatic enhancements.

1. Operational shifts

As a large Housing Authority, DHA deals with large-scale operations and is inevitably concerned with the efficient fulfillment of its responsibilities. DHA seeks to leverage in participation in the MTW program to (i) pursue workforce optimization, (ii) foster human capital growth.

- (i) DHA embraces the premise that our organization’s performance is tightly tied to our ability to dedicate workforce resources to high-impact/high-rewards assignments. Currently, caseworkers are primarily tasked with performing thousands of technical transactions such as annual recertifications, interim changes, initial eligibility assessments and rent calculations every year, confining time spent with the client to a predominantly compliance role. DHA intends to leverage the triennial reexamination MTW provision to shift our workforce’s hyper-focus from compliance-related, to self-sufficiency-related assignments. DHA projects realizing this gain by capitalizing on the aforementioned assignment conversion, rather than by the sole and costly addition of staff to the workforce.
- (ii) By effectuating such change, DHA seeks to reposition staff as dedicated partners to our families, shifting relationship values and power structures to focus on addressing human needs and barriers to upward mobility. DHA anticipates that this shift in assignment and relationship dynamics will nurture human capital growth, such as empathy, encouragement, problem-solving and communication skills conducive to mobility and housing choice as demonstrated by Chetty et al (2019). In that perspective, DHA anticipates developing workforce performance metrics directly tied to the performance of families in the MTW program.

2. Programmatic enhancements

DHA has opted for a Rent Reform policy with strong incentives for participants to engage employment, to truly capitalize on increased earnings (no implicit tax on progress) and to (re)locate

to high-upward mobility neighborhoods. Simultaneously, DHA acknowledges that families may face barriers to accessing employment opportunities when searching for housing. Thus, DHA anticipates deploying resources to assist families with (i) engaging and enhancing their competitiveness in the marketplace, (ii) financial literacy and counseling, and (iii) housing search and landlord brokering.

- (i) Over the last two years, DHA dedicated important resources to develop a technological platform designed to serve our families in unprecedented ways. DHA will continue to leverage its Customer Relationship Management (CRM) system to target and streamline outreach, needs assessment, provide resources and opportunity referrals, and direct connection with service providers. The anticipated automated CRM workflow will be conditioned on individual’s preferences, needs, barriers, and sociodemographic to meet his/her expectations, and to foster service utilization and engagement. This approach will address both direct needs but also other determinants of under- and unemployment and barriers to educational opportunities. This software currently serves as DHA’s primary repository for self-sufficiency-focused operations and will continue to be our client portfolio tracking tool, which will allow DHA to track, in real-time, the effectiveness of its initiatives. As previously highlighted in *The Case of Red Bird Mall*, DHA seeks to continue brokering employment and training-related partnerships to build fast-track pathways for DHA families to increase their earnings and achieve self-sufficiency.
- (ii) DHA will also increase financial literacy, counseling resources to guide families as they increase their earnings and move toward economic independence.

- (iii) DHA will also deploy resources for landlord recruiting and brokering and mobility counseling services, to increase housing choice for families to access opportunity-rich neighborhoods.

Proposed Use of MTW Funds

DHA will use any MTW funds strategically that align with creating pathways to self-sufficiency, reduces administrative costs/streamline operational processes, and/or increases housing choice for the families receiving housing assistance. DHA may exercise fungibility in the use of funds across the public housing and HCV program conditioned on the use of funds meeting an identified need and not jeopardizing the financial integrity of the either program. DHA will build in stringent governance procedures in those cases to ensure program integrity and internal controls are not compromised. Potential Resident Initiative use of funds: (at a macro level we have learned from residents that would be most impactful) *Mobility counseling services* Community resource awareness in housing search Landlord engagement/requirement strategies *Self-Sufficiency* Educational Attainment Employment/job skills training Financial literacy, *Potential Operational/Administrative use of funds* Use of technology to increase operational efficiency, staff training in new service delivery model

Evidence of Significant Partnerships

DHA has numerous longstanding diverse community partners in the fields of education and workforce, family services, and health and wellness to help drive much needed services to low-income communities. DHA actively and continuously pursues collaborations with non-profit, for-profit, and faith-based organizations to help public and assisted housing residents on and off

DHA owned developments. To purposefully overcome accessibility challenges and facilitate resident participation, partners intervene on-site at DHA properties (~4,900 units, 34 developments), offering a broad menu of rich support services. DHA’s capacity to enhance the quality of life of its residents is tied to its organizational capacity and manpower dedicated to such efforts. That is why, in an effort to position itself as a proactive and responsive resource partner, DHA has deployed Family Self-Sufficiency Coordinators (Voucher Program) and Resident Service Coordinators (Public Housing Program) to be at the forefront of its mission. DHA strives to proactively and meaningfully engage its residents, Resident Council’s and its Resident Advisory Board. DHA launches regular survey campaigns to capture the community’s needs, gain insight on resident opinions, and feedback on current operations and upcoming initiatives.

From healthcare to education, athletics and civic engagement, our community partners invest in our families because they understand that their well-being affects the entire community. As we support our families to achieve self-sufficiency, a wide variety of supportive resources are needed to help residents access the services they need. DHA’s community partners provide their time, energy, expertise, passion and considerable resources so that our residents may have a better quality of life. Here are a few of our partners that we work with to support our families

Rent Reform Information

Alternative Rent Policy Selection and Rationale

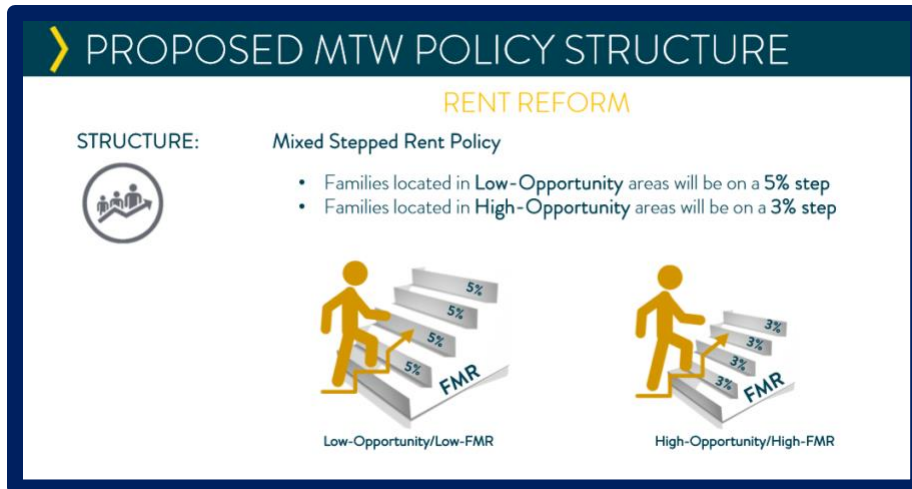
Background: When evaluating which policy to implement, DHA evaluated the fitness of each policy option with the following objectives: (i) foster self-sufficiency, (ii) incentivize households to increase earnings, (iii) increase housing choice and mobility, (iv) incentivize relocation to higher-opportunity areas, and (v) reduce operational costs. When evaluating each policy structure, DHA gave critical considerations to research findings, to the local housing policy landscape, current residential living patterns of HCV families, housing and labor market trends, current operational costs, HUD policy and research priorities, and finally, previous MTW policy evaluations.

Evaluation: Abundant research has tied employment opportunities and upward mobility to neighborhood attributes. Thus, efforts to encourage employment and self-sufficiency must be sensitive to the economic conditions of neighborhoods, which varies across communities. In other terms, the proposed rent reform should be designed to incentivize and reward moves to opportunity-rich areas — conducive to economic self-sufficiency. In fewer terms, location matters. DHA already operates under place-based strategy: Small Areas Fair Market Rents (SAFMRs), which calls for critical consideration when evaluating the suitability of MTW policy structure options.

- Test 1: Is the policy structure location-sensitive?
 - Tiered Rent Structure (MTW Test Rent #1) is not location sensitive.
 - Stepped Rent Structure (MTW Test Rent #2) is location sensitive within an SAFMR policy landscape where the value/increase in step varies across ZIP Code FMR.

- Outcome: Stepped Rent structure appears better suited
- Test 2: How does the Stepped Rent Structure interact with SAFMR policy?
 - Because the step /increase in rent is a function of the value of the ZIP FMR value, a fixed stepped rent structure (MTW Test #2) has the potential to incentivize families to stay or relocate to lower ZIP Codes FMR areas which are associated with lower opportunity.
 - Outcome: Step rate should vary across ZIP Codes based on the opportunity level.

Leveraging its SAFMR policy, and in an effort to incentivize move to opportunity-rich neighborhood to foster self-sufficiency, the DHA proposes lower step in higher-opportunity Zip Code FMRs. Methodologically, FMRs are categorized into two groups: low- and high-opportunity FMRs and assigned a step rate where high FMRs have a lower step rate (3%) than low FMRs (5%). Such approach has the great potential to maximize policy impact by increasing access to economically vibrant neighborhoods and by incentivizing moves from higher-poverty/lower opportunity-FMR areas. Therefore, **DHA opts for MTW Test Rent #3**, which equates to a non-fixed, stepped rent policy structure.



Describe Alternative Rent Policy to the Public

TIMELINE: DHA anticipates submitting its MTW plan to HUD by January 8, 2021. The announcement of awardees is expected in March 2021. If DHA is selected, HUD anticipates six to twelve months to finalize the plan and implementation logistics with DHA, which means that the implementation should start between October 2021 and March 2022, after which enrollment will begin. Significant Dates and Milestones for PHA’s local MTW Program

Detailed schedule from entry into MTW Demonstration Program through the first two years, include resident and community engagement, development of

MTW Major Milestone Timeline (to be developed more in version 2 based on HUD award schedule)

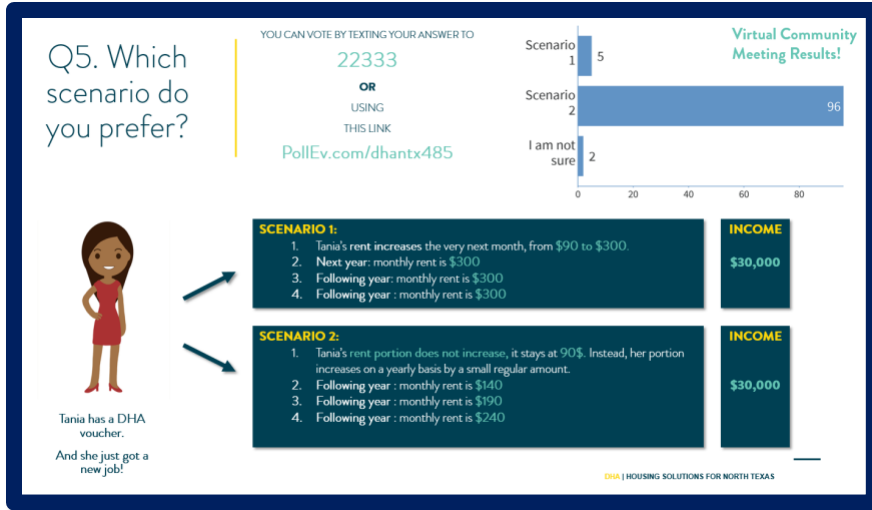
- Formation MTW Advisory Committee
- Program Design and Evaluation criteria
- Hardship Policy
- Impact Analysis

- Agency Plan
- Declaration of Waiver Request to HUD: MTW Waivers, Safe Harbor Waives, Agency Specific Waivers, Cohort Specific Waivers
- RCT Random Assignment
 - Control & Test Group
- Enrollment Period
- Notification of Families
- VMS MTW reporting
- Meetings with HUD and MTW Researcher
- Technology Platforms
 - Yardi Systems
 - Zoho
 - Aunt Bertha
- Landlord Recruitment strategy
- Public Education strategy
- Existing family outreach
- Identification of study and control group
- Research questions
- Program design
- Resident Engagement
- Staff Training

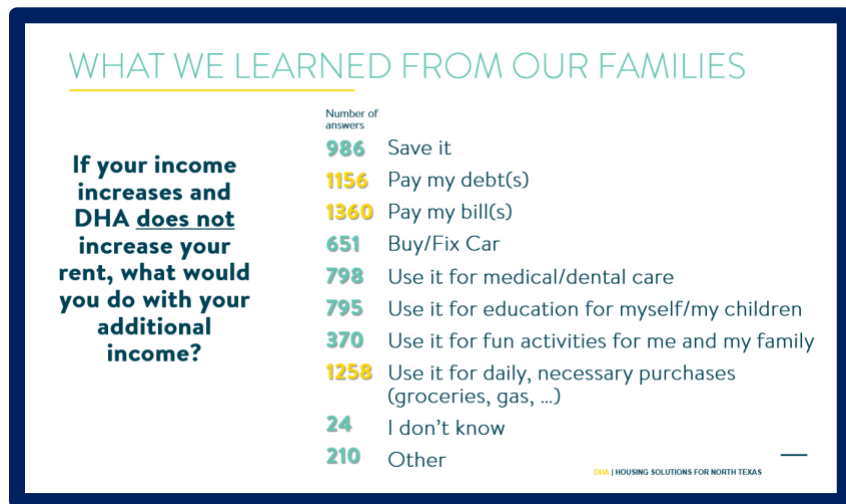
WHO CAN PARTICIPATE IN THE MTW PROGRAM? Eligible households include existing, currently assisted households in DHA’s Housing Choice Voucher Program and new households admitted into the Voucher program during the alternative rent enrollment period. Elderly and disabled households, families in the Family Self-Sufficiency program, and Public Housing residents will be excluded. If selected, DHA, in partnership with HUD, will consider other exclusions.

Through a lottery process, eligible households will be randomly assigned to either of two groups, a control group that pays rent based on the Brooke Amendment income-based rent (where the participant contribution is 30% of adjusted income) or the experimental group that pays rent based on the DHA’s proposed MTW rent reform (stepped rent, based on SAFMR).

BENEFITS OF PROPOSED MTW RENT: DHA recognizes that the Brooks Amendment income-based rent formula creates a disincentive for program participants to work. When a participating tenant becomes employed, their rent portion increases commensurately with their increased income, making it harder for families to enjoy their increase in income and to enhance their quality of life. Early DHA outreach efforts have shown that an overwhelming majority (79%) of HCV families do not think it is fair for their rent to increase when their income increases, and over 93% of survey respondents prefer the DHA-proposed MTW rent reform formula compared to the Brooks Amendment income-based rent formula.



The primary benefit of the proposed MTW rent reform policy is that families who experience an increase in their income will not experience an immediate increase in their rent as a result of their employment achievements. DHA believes that the proposed rent policy will enable families to further enhance their quality of life, motivate them to pursue additional opportunities, achieve long-term self-sufficiency and closely mirror real world private market practices. Early survey results support DHA’s proposition.



HARDSHIP POLICIES:

Sensitive to the diverse needs of its client population, DHA seeks to establish several hardship policies that will respectively apply under pre-set conditions that will provide relief to qualified families participating under the proposed MTW Rent Reform. DHA, following an investigation, will determine whether a household qualifies for the requested hardship consideration.

On-boarding hardship policy: This hardship policy can be requested by zero-income households for whom the initial on-boarding into the MTW program results in an increase in rent portion, and households for whom the first-year payment under the MTW Rent Reform would result in an increase of at least 50% in rent portion. The on-boarding hardship policy will allow qualified households to maintain their current rent payment, that is their rent payment before the institution of the MTW rent reform formula, for a period of up to (3) three months. After the (3) three months, they will be responsible to pay the rent portion designated under the MTW rent reform formula.

Decrease in income hardship policy: This hardship policy can be requested by households experiencing a loss of income due to extraordinary circumstances out of the household's control resulting in extraordinary financial distress and the household's inability to pay rent accordingly to their rent schedule. If granted, the rent payment will be reset to the step closest to 30% the family's income.

Zero-income hardship policy: This hardship policy can be requested by zero-income households who (1) have demonstrated good-faith efforts in securing employment income, including job applications, interviews, and participation in DHA-brokered self-sufficiency activities, and (2) are in financial distress due to extraordinary circumstances out of the household's control. If granted, the rent payment will be set at the "Minimum Rent" of \$130 for a period not to exceed (3) three months.

Extensions of each hardship policy are available on a case-by-case basis provided households can demonstrate that they are making a good-faith effort to secure income, including the evidenced based criteria mentioned above.

Background: A PHA has three options. HUD MTW Test Rent #1 – which is a “Tiered Rent” structure where households are grouped by income into tiers; rents are fixed within each tier. MTW Test Rent #2 is a Stepped Rent structure where rents are increased annually by a fixed amount. The annual stepped rent increases may not be less than 2% of the Fair Market Rent (FMR) or exceed 4% of the FMR. Or a PHA can propose a tiered or stepped rent that is different from the two mentioned above (said “MTW Test Rent #3).

Description and justification: As mentioned in the section titled “Rent Reform Information - Alternative Rent Policy Selection and Rationale” DHA has opted for MTW Test Rent #3, which allows for an innovative policy to be tested in its seven-county jurisdiction. A large body of research has shown the importance of location on upward mobility, health, earnings and educational attainment. Thus, efforts to incentivize self-sufficiency should include location. Because the MTW Test Rent #1 Tiered 1 is not location sensitive, it is not chosen by DHA. Because DHA operates under a Small Area Fair Market Rent (SAFMR) policy, a stepped rent structure policy is location sensitive as the rent payment for a family will vary depending on which ZIP Code the family resides. However, a fixed stepped rent structure (such as MTW Test #2) has the potential to incentivize families to stay or relocate to lower ZIP Codes FMR areas which are associated with lower opportunity.

That is why, in an effort to incentivize moves to opportunity-rich neighborhoods to foster self-sufficiency, DHA proposes lower steps in higher-opportunity Zip Code FMRs.

Methodologically, ZIP Codes are categorized into two groups: low- and high-opportunity FMRs

and assigned a step rate where high-opportunity FMRs have a lower step rate (3%) than low-opportunity FMRs (5%). Such approach has the great potential to maximize policy impact by incentivizing moves from high-poverty/low opportunity-FMR areas for families seeking to access opportunities without the conventional increase in tenant portion of rent associated with move to high opportunity, higher rent –ZIP Code.

Similarly, in the MTW Test Rent #2, each household's year one rent will be set on the SAFMR step closest to 30% of their gross income (or the DHA's minimum rent). After the first year, each household's rent will increase by the annual stepped rent increase, regardless of their income, and this based on whether the household reside in a high or low-opportunity SAFMR. DHA has instituted three hardship policies that families may request, which upon evaluation, would allow qualified households to benefit from rent relief as designated by the applicable hardship policy. DHA is uniquely positioned to generate strong empirical evidence to foster public policy advancement. The jurisdiction encompasses (seven counties) offers great geographic and socio-economic diversity enabling researchers to account for varying housing market and economic conditions when evaluating policy impacts. In addition, the unique policy landscape within which DHA operates would enable research investigators to conduct comparative evaluations of stepped rent formula across PHAs with and without SAFMR, as well as PHAs opting for a single step rate as opposed to pre-set ZIP Code-based rates. DHA is confident that the innovative proposed MTW policy will provide other PHAs with critical operational insight to understand how the pursuit of location-sensitive policies such as SAFMR and Stepped Rent impact the performance of their program and the families they serve.

Information Technology

DHA has engaged its IT software provider, Yardi, in collaborative working sessions with regard to software modifications that will be required to Yardi Voyager, if selected for MTW. The purpose of these sessions is to discuss projected software needs in light of the proposed policy structure and mechanisms involved in respectively tracking treatment and control group households and determining appropriate step rate, payments, and readjustments needed as households relocate and/or experience hardship. Currently, DHA's PD&R department are drafting a list of algorithms and programmatic rules to guide Yardi during future sessions. Yardi has provided a letter of support affirming its platform has the functionality to handle all elements of DHA's proposed MTW Rent Reform plan.

DHA will also use third party Customer Resource Management software platform. The CRM will serve as the repository of all tenant quality of life needs. This system will integrate with the Yardi system.

Appendix 1

Moving to Work Certifications of Compliance

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

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

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

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

(8) The PHA certifies that the Board of Commissioners has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-56007.1 (or successor form as required by HUD).

(9) The PHA must certify that it will carry out its application in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d-2000d-4), the Fair Housing Act (42 USC 3607-19), Section 504 of the Rehabilitation Act of 1973 (29 USC 794), and title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.), regulations implementing these authorities, and other applicable Federal, State, and local civil rights law and that it will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified by the Assessment of Fair Housing conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7 (o)(3) and 903.15(d). Until such time as the PHA is required to submit an AFH, and the AFH has been accepted by HUD, the PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR part 91 the PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its 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 maintains records reflecting these analyses and actions. The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2).

(10) The application is consistent with the applicable Comprehensive Plan (or any plan incorporation such provisions of the Comprehensive Plan) for the jurisdiction in which the PHA is located.

(11) The application contains a certification by the appropriate State or local officials that the application is consistent with the applicable Consolidated Plan, which incorporates a fair housing strategy that reflects the jurisdiction's Assessment of Fair Housing or Analysis of Impediments to Fair Housing Choice, as applicable, and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.

(12) The PHA affirmatively furthers fair housing. A PHA shall be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) Examines its programs or proposed programs; (ii) Identifies fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; (iii) Specifies actions and strategies designed to address contributing factors, related fair housing issues and goals in the applicable Assessment of Fair Housing (AFH) 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 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 Analysis of Fair Housing, in accordance with 24 CFR 5.150-5.180; (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 and civil rights violations. PHAs that are not yet required to submit an AFH shall adhere to the requirements under 24 CFR 903.7(o) in effect prior to August 17, 2015.

(13) The PHA complies with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

(14) The PHA complies with the Architectural Barriers Act of 1968 and its implementing regulations at 24 CFR Part 41, Policies and Procedures of the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

(15) The PHA complies with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or-Very –Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

(16) The PHA complies with requirements with regard to a drug free workplace required by 24 CFR Part 135.

(17) The PHA complies with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

(18) The PHA complies with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

(19) The PHA will take appropriate affirmative action to award contracts to minority and women’s business enterprises under 24 CFR 5.105(a)

(20) The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 CFR Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.

(21) 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.

(22) The PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.

(23) The PHA will comply with the Lead-Based Pain Poisoning Prevention Act and 24 CFR Part 35.

(24) The PHA will comply with the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards at 2 CFR Part 200

(25) The application and all attachments are available at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Dallas Housing Authority
PHA Name

TX009
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)

Troy Broussard
NAME OF AUTHORIZED OFFICIAL*

President/CEO & Board Secretary
TITLE

SIGNATURE

DATE

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

Appendix 2: Public Process Documentation

Evidence that residents and HCV participants were notified of the PHA's intention to participate in MTW Demonstration program

Notice of DHA's Intent to Participate In HUD's Moving to Work (MTW) Demonstration Program

Please accept this form as official notice to you as a DHA HCV participant or resident of DHA's intent to participate in HUD's Moving to Work (MTW) Expansion Cohort #2 Rent Reform

Under the MTW Expansion Program - Cohort #2 Rent Reform HUD will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce PHA administrative burdens.

To find out more about HUD's MTW Program please log onto
https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw

To find out more about how you can get involved in the development of DHA's MTW Plan please log onto our website at www.dhantx.com.

Your input is an important element in the design of DHA's MTW Program. Over the next several months we will ask you to engage and participate in various ways in the drafting of our MTW Plan, including but not limited to attending virtual resident/community meetings, participating in electronic surveys, being a part of a public hearing as well as a DHA Board of Commissioners meeting.

We will send electronic communication through the Rent Café to provide regular and on-going updates regarding the drafting of the DHA's MTW Plan.

Appendix 2: Public Process Documentation

Communication Channels

An essential element of DHA’s MTW Plan design is centered in community engagement. DHA developed multiple communication channels with continuous feedback loops from residents and key stakeholders that drove the framework of the plan. Our community engagement approach is not narrowly focused simply based on design but rather is a fundamental part of the evolution of the plan in the months and years to come as DHA looks to build a MTW Plan that designs and test innovative, locally designed housing and self-sufficiency strategies for low-income families.

Will impact the initial MTW Plan design but will also be a critical role in the planning period after award. to easily access information, complete surveys and provide feedback loops.

www.dhantx.com/rent_reform_mtw_program/

Survey administration results

created a landing page dedicated to the MTW Demonstration program

Appendix 2: Public Process Documentation

Evidence two resident meetings were held

Appendix 2: Public Process Documentation

The public notice advertising the public hearing

Appendix 2: Public Process Documentation

Evidence that the public hearing was held

(items could include minutes, sign-in sheet, etc)

Appendix 2: Public Process Documentation

Board Resolution

Resolution signed by Board adopting application, including the MTW Plan, and certifications contained therein. Reso must also confirm that the public process requirements described in Section 5(A)(i)(c) of this Notice were met.

Appendix 3: Required Standard Forms

Cert Consistency with Consolidated Plan

Appendix 3: Required Standard Forms

Cert of Payments (HUD-50071)

<p>Certification of Payments to Influence Federal Transactions</p>	<p style="text-align: right;">OMB Approval No. 2577-0157 (Exp. 01/31/2017)</p> <p>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</p>
<p>Applicant Name</p> <p>Dallas Housing Authority</p>	
<p>Program/Activity Receiving Federal Grant Funding</p> <p>Moving To Work Demonstration Program Cohort #2 Rent Reform</p>	
<p>The undersigned certifies, to the best of his or her knowledge and belief, that:</p>	
<p>(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.</p> <p>(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.</p>	<p>(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.</p> <p>This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.</p>
<p>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)</p>	
<p>Name of Authorized Official</p> <p>Troy Broussard</p>	<p>Title</p> <p>President & CEO</p>
<p>Signature</p>	<p>Date (mm/dd/yyyy)</p>
<p>Previous edition is obsolete</p> <p style="text-align: right;">form HUD 50071 (01/14) ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3</p>	

Appendix 3: Required Standard Forms

Disclosure of Lobbying Activities (SF-LLL)

DISCLOSURE OF LOBBYING ACTIVITIES		Approved by OMB 0348-0046
Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352 (See reverse for public burden disclosure.)		
1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: _____ Congressional District, if known: 4c _____	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: _____ _____ _____ _____ Congressional District, if known: _____	
6. Federal Department/Agency: _____	7. Federal Program Name/Description: _____ CFDA Number, if applicable: _____	
8. Federal Action Number, if known: _____	9. Award Amount, if known: \$ _____	
10. a. Name and Address of Lobbying Registrant <i>(if individual, last name, first name, MI):</i> _____ _____ _____	b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i> _____ _____	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.		Signature: _____ Print Name: _____ Title: _____ Telephone No.: _____ Date: _____
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)



Appendix 4: Other Supporting Documentation

Letters of Support, community meeting material, resumes, etc. limited to 10 pgs.

SUBPART 1: PARTICIPATING PHAs