

Housing Solutions for North Texas

# **APPLICATION:**

# **MOVING TO WORK** DEMONSTRATION **PROGRAM** //

Cohort #2 Rent Reform

# **SUBMITTED BY:**

Troy Broussard, President & CEO DHA, Housing Solutions for North Texas (Dallas Housing Authority)



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DHA is pleased to submit our application for the Moving To Work (MTW) Program. We passionately support the program and commend HUD for developing an evidence-based initiative as the basis for housing reform.

#### (I) Our Vision

Research and implement cost effective, evidence-based strategies that combine rent reform and housing choice policies, placing families in the best position to escape the debilitating effects of generational poverty and help them become economically self-sufficient.

*Realizing the Vision:* Starting in 2016, DHA launched a series of strategic initiatives to deliver on this vision. Our team made a paradigm shift in our applicant/client relationships. Historically, the administration and delivery of affordable housing centered around rigid determinations of eligibility and compliance. Conversations focused on income, household makeup and other process questions which, though necessary for compliance, minimized our ability to assist clients with their unique needs. We believe it is more beneficial to serve as partners, helping families attain their goals versus acting primarily as rent-setting enforcement officers. DHA believes engaging clients in self-sufficiency conversations pertaining to: job search, job skills, children's school performance, and neighborhood selection is more beneficial to families. Client conversations in the HCV program are typically 80% focused on administrative topics and 20% on self-sufficiency goals and plans. As part of our MTW Rent Reform Plan, we will invert where we focus our time. This evolution will create stronger relationships based on trust, helping more families achieve independence.



#### **Current HCV Client Conversations**

80% Administrative

20% Self-Sufficiency

#### Goal for MTW HCV Client Conversations

20% Administrative 80% Self-Sufficiency

Figure 1

To advance this vision, in 2016 DHA began to deploy several strategies: using technology to increase efficiency, developing evidence-based policies, and creating programs to enhance housing choice opportunities. These actions allow for redeployment of personnel to focus on helping clients attain their goals. MTW will permit DHA to further advance this vision. *Technology:* DHA is an innovator among PHAs in its use of technology to increase productivity, enhance efficiency, automate processes, improve accessibility to programs/services, and track demographic data to evaluate client needs. Following are examples of how technology improves outcomes for our clients. Yardi Voyager 7s is DHA's housing data management platform. In 2020, DHA launched Yardi's Rent Café Tenant portal that allows clients to complete recertifications and report other changes online, creating efficiencies. Historically, 42 employees have been necessary to manage this analog process, but now we can refocus their time on mobility/self-sufficiency counseling. While Yardi provides excellent functionality in program management, DHA needed an equally robust platform to track quality of life services so we deployed a Customer Relationship Management (CRM) system. The CRM system allows us to track client needs, automate and route workflows, and manage large datasets. DHA successfully deployed the CRM for our Children First North Texas (CFNTX) mobility counseling initiative; delivery of CARES Act Temporary Rental Assistance; COVID-19 Wellness Check initiative, and our job development initiative. DHA also uses artificial intelligence to enhance delivery, improve HQS inspections, and help landlords market units and find voucher clients.

*Formation of Our Policy Development & Research (PD&R) Dept.:* In 2018, DHA established a PD&R department to develop data-driven strategies to combat segregation and poverty, foster upward mobility, and enable system-wide operational improvements. DHA's leadership and the PD&R team have designed and implemented a series of pilot programs intended to generate empirical evidence about the relative success of various strategies to create pathways to selfsufficiency through relocation, education and mobility counseling, employment opportunity, and connection with supportive services. Our agency has the expertise to participate in applied research/demonstration projects to contribute to national policy advancements and to meet the pressing needs of the families we serve.

*Mobility:* Research shows a key factor for families to break the cycle of poverty is location. HCV families tend to live in high-poverty, under-resourced areas, which are associated with significantly lower rates of upward mobility. We believe it is critical to develop deeper trust with clients and take an active role in assisting them with attaining self-sufficiency. In January 2020, DHA launched **Children First North Texas (CFNTX)** to educate HCV families living in Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs) on the impact of the location, and to support housing choice and relocation to higher-upward mobility areas.

*Creating Moves to Opportunity Expansion (CMTOx):* In 2020, DHA was selected to be one of three PHAs in the nation to collaborate with Harvard University's research group, Opportunity Insights (OI). Our research is exploring whether, and how, the coupling of mobility services with self-sufficiency focused model of administration impact the residential living patterns and long-term trajectories of HCV families.

*Unique Challenges and Opportunities:* The DFW region accounts for some of the country's most severe rates of neighborhood inequity, and HCV families tend to disproportionately reside

in highly segregated neighborhoods, likely to fuel intergenerational poverty and dependence on governmental assistance. DHA faces several challenges including: extensive poverty - 1 in 3 children in Dallas grow up in poverty; the expansive DFW area lacks adequate and equitable mass transit; a short supply of affordable housing; high rates of rental occupancy; concentration of HCV families living in R/ECAPs; and Small Area Fair Market Rents (SAFMR) - which may place financial pressure on HAP budget authority. Our proposed MTW policy is designed with these challenges in mind, and focuses on helping families relocate to high-upward mobility neighborhoods. Currently, HCV families face constraints, including lack of landlord participation, and limited access to information about high-opportunity neighborhoods. To help mitigate these challenges, our MTW model includes proactive, integrated case management services to remove barriers to housing choice, incentives for landlord participation and employment support.

Our unique attributes include program size and diversity; a seven-county, 5,300 square mile HCV jurisdiction; and extensive SAFMR experience as the first housing authority in the country to implement the SAFMR, which currently has 560 individual Fair Market Rents.

	Dallas	871.3	Collin	841.2
DHA Housing Choice Voucher Jurisdiction	Tarrant	863.6	Ellis	935.5
Square Miles	Rockwall	127.0	Kaufman	780.7
	Denton	878.4	DHA Jurisdiction	5,297.7

Figure 2

Within our seven-county jurisdiction there is a mix of urban, rural and suburban areas. These dynamics in our market can provide HUD and our peers with clear insights that have national relevance. Additional MTW program benefits our market provides:

1) Operational Shift: improved efficiency, increased accessibility and focus on self-sufficiency;

**2) Innovation & Technology:** Artificial Intelligence (AI) and Customer Relationship Management (CRM) systems; **3) Leadership:** 120+ years' experience in

affordable housing; **4) Deep Expertise:** in design, implementation, evaluation and reporting; **5) PD&R:** enables data-driven decision making; **6) Performance:** finding free Single Audit for seven years, HUD SEMAP High Performing PHA for five years; **7) Key Partners:** supporting efforts to expand housing choice; **8) Strong DFW Job Market:** favorable for self-sufficiency. *Why do we want to participate?* DHA has been on a path for several years to help improve equitable access to services, resources and opportunity for our families. We have established the right talent and operational capabilities to test new policies as part of the MTW program that engages families more effectively toward self-sufficiency, while making the overall HCV program more efficient and cost effective. We also have strong support from HCV clients for rent reform - 93% of respondents to our community survey reported to be in favor of our proposed MTW policy. Our team is invested in contributing to national policy innovations that will help advance PHAs across the nation and help the families we serve have greater opportunities to break the cycle of generational poverty.

#### *Experience/skills of personnel with responsibility for the administration of the MTW Plan:*

DHA has the capacity and talent to effectively administer the MTW program. We have 300 team members serving more than 55,000 people each day. Our HCV program assists 16,000+ families with annual HAP budget authority of \$186M. In the administration of the HCV program, DHA has earned HUD's SEMAP "High Performer" designation for five consecutive years. DHA has received finding-free Single Audits since FY-2013. We will bring this same level of professionalism to the MTW program. Here are the lead departments for MTW.



	Lead Departments				
Major Objective	Executive	PD&R	НСУ	Finance	Compliance
Community Engagement					
Research & Evaluation					
Program Design					
Policy & Procedure					
Staff Training					
Program Reporting					
Internal Reviews					
Program Implementation					
					Figure 3

We are a compassionate team of leaders with more than 120 years of industry experience. More in-depth biographies can be found in Appendix 4.

**Executive Team: Vision/Resource Allocation:** Troy Broussard, CEO: 27 years in the industry (all with DHA), will provide program vision and David Zappasodi, COO: 43 years of experience and NAHRO Fellow, will lead day-to-day MTW operations.

**PD&R Team: Research/Policy Design/Evaluation:** Leads our agency's research efforts and tech advancements in the development of innovative data-driven programs and policy, including design operations for departmental implementation, and associated analytics and reporting. The PD&R Department is led by Dr. Myriam Igoufe (Vice President), Dr. Maggie Deichert (Director), and Will Sanders (Assistant Director Advanced Analytics) who each bring expertise in housing policy, poverty research, machine learning and advanced statistical modeling. DHA's PD&R personnel collectively count over 20 years of experience in applied research and program operationalization, over \$6 million in funded research, and have received media coverage from the Wall Street Journal, the Texas Tribune, NPR, CBS, and the Dallas Business Journal, among others.

**HCV Team:** Brooke Etie, LCSW, VP of Voucher Programs:14 years of HCV & FSS experience, leads a team of 100 that will implement MTW Rent Reform operations.

Finance Team: Chetana Chaphekar, CPA, CFO: 30 years of experience, will lead finance and IT.
Compliance Team: Jeni Webb, Director of Compliance: 10 years of experience, a former HUD official; responsible for drafting policy, procedures, training, internal reviews and compliance.
Resident Services Team: LaShonne Watts, Esq., Resident Services Director – assembled 35 organizations that provide critical services to support DHA clients.

#### 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 our programs or proposed programs, identifying any impediments to fair housing choice within those programs and addressing them in a reasonable fashion. DHA will consider available resources 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 will maintain records reflecting these analyses and actions.

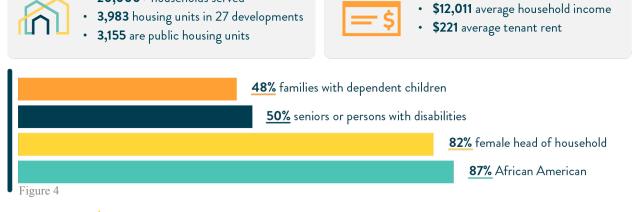
#### (II) Plan for Future Community/Resident Engagement

DHA will continue to actively engage and listen to our residents and community to further our understanding of their needs, challenges and benefits. DHA will solicit input through communication platforms including but not limited to in-person or virtual meetings, surveys, website postings, newsletters, email campaigns, etc. DHA will continue to utilize its highly

successful strategies (see Appendix 2) to ensure an inclusive and transparent planning and implementation process. In addition, DHA will leverage and grow its existing network of trusted partners in the fields of education, workforce, family services, health, sports, and business to support the success of our proposed MTW program. Additionally, DHA has assembled an MTW Advisory Committee made up of key private and public sector partners and clients. The committee will meet monthly to review proposed MTW policy, make recommendations and provide direct services to augment the MTW Plan. Please see the letter of support from our advisory committee in Appendix 4.

#### (III) PHA Operating and Inventory Information

DHA, formed in 1938, provides affordable housing solutions to over 20,000 households across seven North Texas counties, supporting 55,000 individuals. DHA owns and operates 3,983 rental housing units in 27 developments, 3,155 are public housing units. DHA's public housing and housing voucher programs combined consist of 50% seniors or persons with disabilities; 87% African-American, 82% female-headed households, and 48% families with dependent children. The average household income is \$12,011 and the average tenant rent is \$221. DHA offers a large sample size for the MTW program. We estimate 8,328 families are potentially eligible to participate in the Rent Reform study (6,758 HCV and 1,570 public housing).





20,000+ households served

*DHA's challenges occupying Public Housing units and leasing HCV units:* DHA effectively maintains its inventory of public housing units. Properties that are approaching the end of their useful lifespan are scheduled for re-development. DHA maintains an extensive waiting list and sustains a 98% occupancy rate in its public housing portfolio. DHA's HCV program has experienced extensive challenges as a result of economic conditions that created a short supply and increased demand for rental housing, driving rents to record highs. Landlords who previously enjoyed the assurances of receiving HCV rent payments are now more likely to decline HCV renters seeking to avoid government regulation and inefficiency, given the absence of source of income protection law in Texas.

# Examples of Innovation & Creativity within Current Program (include grants received, participation in other HUD Programs, etc.):

DHA received four of the highly competitive HUD HOPE VI Implementation Grants with the total award amount of \$103,507,186. These funds were leveraged with over \$101 million in multiple other financing sources including Low-Income Housing Tax Credits, Tax-Exempt Private Activity Bonds, Affordable Housing Program (AHP) grant funds from the Federal Home Loan Bank, private debt, and other sources for total program sources in excess of \$204 million. Along with support services, these funds were used to redevelop three of DHA's public housing sites with both affordable and market rate rental units and develop 344 units of public housing in non-minority, high opportunity areas of North Dallas. Additionally, partnering with Habitat for Humanity, DHA was able to assist 25 low-income families to purchase their own homes. DHA was also the first housing authority to implement SAFMR in 2011. Below are examples of innovative programs we have implemented including HUD Special Purposes Voucher Programs such as Homeownership and Project-Based Vouchers. 2,000+ Workforce Housing Units at 8 DHA Properties | Veterans Affairs Supportive Housing (VASH) | Family Self-sufficiency Program | Family Unification Program (FUP) | Single Room Occupancy (SRO) | 5-Year Mainstream | Non-Elderly Disabled (NED) Vouchers | Homeownership Programs | Project-Based Voucher Program | Mobility Counseling | Head Start Centers On-site at 4 DHA Properties | Healthcare Clinics Near/ On-site at 5 DHA Properties

**Artificial Intelligence (AI) Technology:** To better align DHA procedures with private sector rental practices, DHA employs AI technology. With the help of AI experts, DHA has created the Bob.Ai app, aka InspectionMate, that transforms the landlord and client experience. The app expedites the housing search and lease process, informing applicants about neighborhoods, housing unit availability and features.

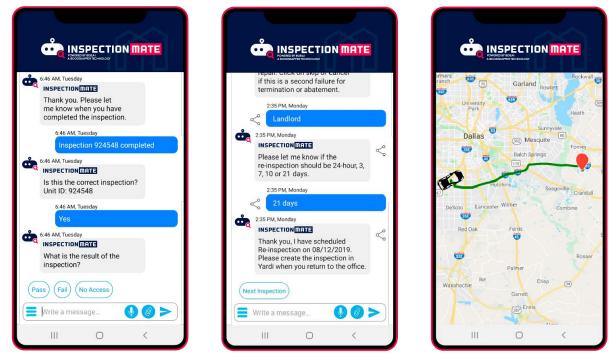


Figure 5: Screenshots of the application.

Through the app, landlords can schedule inspections, receive Uber-like updates on when the inspector will arrive, and real time inspection results. Previously, HQS inspections were



scheduled manually with communications primarily by mail. DHA's housing inspections have transformed into an efficient and user-friendly process. Our app features include live chats and digital submission of critical documents to expedite processing. DHA has significantly improved its landlord experience, enabling us to increase voucher acceptance.

*Brokering Employment Opportunities for DHA Families:* In 2019, a major employer, Chime Solutions, entered the market with 400 jobs to be filled in South Dallas. DHA proactively launched a series of analyses, surveys, and sessions with the employer to identify competitive candidates within DHA's HCV population near the workplace. Upon receiving DHA's report, the employer scheduled 80 interviews for DHA candidates in advance of public recruitment. DHA candidates interviewed in a 1:1 setting, with job offers made the same day. This innovation provided DHA families with a tangible fast-track for them to engage in the workforce.



Children First North Texas (CFNTX): In 2020, DHA launched CFNTX

focusing on families with children living in the most impoverished and segregated neighborhoods in our region. CFNTX is designed to

systemically assist families with relocating to high-upward mobility neighborhoods through personalized mobility counseling, matches with social service providers, and financial assistance. Recently in partnership with Harvard University's research group, Opportunity Insights, DHA has been selected as a Creating Moves To Opportunity expansion (CMTOx) site to expand testing of mobility counseling-focused administration models.

*COVID-19 Pandemic Response:* DHA launched a proactive wellness check to assess clients' immediate needs, provide resource referrals, and monitor ongoing needs. We prioritized at-risk families; assessed food/medicine insecurity and perceived exposure to COVID. As needs were identified, DHA brokered services and made referrals to help clients address these challenges.

#### (IV) Plan for Local MTW Program

DHA's MTW program would foster self-sufficiency by supporting Housing Choice and incentivizing employment to improve quality of life. DHA intends to meet community needs through: (1) operational shifts and (2) program enhancements.

1 - Operational Shifts: DHA efficiently handles large-scale operations. We will leverage MTW to further workforce optimization, and foster human capital growth. DHA will dedicate workforce resources to high-impact roles. Caseworkers are now primarily tasked with thousands of administrative/compliance transactions such as recertifications, interim changes, eligibility assessments and rent calculations. DHA will leverage the triennial reexamination of MTW to shift our team's primary focus to self-sufficiency. DHA will reposition our client facing team as partners to help families overcome obstacles to upward mobility. This shift will nurture human capital growth (empathy, problem-solving, communication skills) conducive to mobility and housing choice. We will track metrics tied to success of families in the MTW program.

2 - Program Enhancements: Anticipating job and housing barriers in high opportunity areas, DHA will deploy resources to assist families with work, financial literacy, and housing search/landlord brokering. DHA's CRM system enables us to streamline outreach and needs assessments, provide resources, and connect families with services. The automated CRM workflow will be conditioned on individuals' preferences, needs, barriers, and sociodemographics to meet client expectations, and to foster service utilization and engagement. This approach will address direct needs and other determinants of unemployment, and barriers to educational opportunities. This tracking tool allows us to evaluate client progress and plan effectiveness in real time. We will continue to broker employment and training partnerships to build pathways for families to increase earnings and achieve self-sufficiency. DHA will increase financial literacy counseling to guide families as they increase their earnings and move toward

economic independence. DHA will deploy resources for landlord recruitment and mobility counseling to increase Housing Choice.

#### (V) Proposed Use of MTW Funds

DHA will strategically invest MTW funds to create pathways to self-sufficiency, reduce administrative costs, streamline processes, and increase Housing Choice. DHA requests flexibility in the use of funds with the condition that the usage meets an identified need and does not jeopardize our financial integrity. We will establish stringent governance procedures to ensure program integrity and that internal controls are not compromised.

#### (VI) Key Partnerships

DHA has formal partnerships under MOUs with 35 strategic partners in education, workforce, family services, health, sports and business after identifying needs through regular resident/ client surveys. Partners contribute time, expertise, passion and resources as they understand our families' well-being lifts quality of life for the entire community.

*The Apartment Association of Greater Dallas (AAGD):* The largest trade association for the multifamily industry in our region representing 600,000+ units in North Texas. We are partnered with the AAGD for landlord and property manager education about the voucher program to increase participation and engagement.

Committed to the pursuit of research, innovation, and data-driven policy, DHA also partners with Research Universities to study the impact of housing assistance on health, fair housing challenges, and the impact of mobility counseling on long-term trajectories of HCV families.

*Harvard University/Opportunity Insights:* Opportunity Insights is a nonpartisan research team based at Harvard University led by renowned economist, Dr. Raj Chetty. DHA is one of only three public housing authorities (PHAs) across the country that will be part of this next phase

of the CMTOx research project, which focuses on research to see if a comprehensive suite of service strategies, such as search assistance and landlord engagement, is effective in increasing geographic choice among Housing Choice Voucher families with young children.

*Johns Hopkins University/University of Michigan:* DHA is participating in a HUD-sponsored initiative in partnership with these universities to better understand development and health markers for children between the ages of 3-10 years old whose families are facing housing challenges. The initiative compares the health implications and outcomes for those children whose families that secure vouchers and those who do not.

*University of Texas at Arlington:* In 2017, DHA partnered with the University of Texas at Arlington to investigate spatial and fair housing inequities in North Texas focused on Affirmatively Furthering Fair Housing, constituting the country's largest collaborative research effort of its kind.

#### (I) Alternative Rent Policy Selection and Rationale

DHA has chosen MTW Test Rent #3 – a modified stepped rent policy or "mixed stepped rent policy." Operating within an SAFMR landscape, DHA proposes a lower (3% step) in high-opportunity ZIP code FMRs than in lower opportunity ZIP code areas (5% step). DHA chooses this location-sensitive policy as it is most likely to foster self-sufficiency, increased Housing Choice/mobility and earnings. It is strongly supported by DHA's residents and is cost-effective.

#### (II) Describe Alternative Rent Policy to the Public

HUD anticipates projected MTW enrollment to begin in the Spring of 2022. Eligible participants will include currently assisted and new households admitted during alternative rent enrollment. Elderly and disabled clients, Walker settlement and special purpose voucher holders will be

excluded. DHA and HUD may consider other exclusions. Through a lottery, eligible households will be randomly assigned to two groups: a control group that pays rent based on the Brooke Amendment income-based rent, or the "treatment group" that pays rent based on DHA's proposed MTW rent reform. A primary benefit of the proposed MTW rent reform is that families who have an increase in income will not have an immediate increase in rent. Participants will also have enhanced case management, increased housing choice, and predictable rent payments. This will enhance quality of life by motivating families to pursue more opportunities and achieve long-term self-sufficiency. DHA hardship policies would ensure that a household will receive a hardship if the rent burden exceeds 40% of current/anticipated total annual gross income. If a household is unable to pay rent, hardship rent is reset to the step closest to 30% of the family's income or to a minimum rent.

For complete details about MTW Test Rent #3, as requested in PIH-2020-21, please see pages 16-60.

#### (III) Information Technology Plan

DHA will continue to leverage our AI and CRM systems to provide services to our clients participating in the MTW program. This will enable us to track our clients' participation and progress at both the individual and aggregate levels, communicate with them in real-time and provide them with access to supportive services virtually. Our team is also working on customizing Yardi Voyager to track treatment and control group households and determine appropriate step rate, payments, and hardship or relocation adjustments. Currently, DHA's PD&R team is drafting a list of algorithms and program guidelines to guide Yardi's system updates. (Please see the letter of support and commitment from Yardi for the MTW program in Appendix 4.)



#### (IV) MTW Test Rent #3

#### A. Description and justification of the PHA-proposed policy

**Background:** The development and adoption of the DHA's MTW proposed rent has been informed by critically exploring (1) scholarly research findings, (2) current sociodemographic profile of HUD population, (3) labor market projections, (4) evaluation policy costs, and (5) community feedback and preferences.

#### 1. Connecting Research Findings and Attitudinal Insight to Inform MTW Program Design

Means-tested subsidized programs continue to generate strong debate in policy and academic circles as budget pressures on public resources continue to grow and poverty persists. Critics argue that subsidized housing programs contribute to the "poverty trap" by creating disincentives to employment and inhibiting self-sufficiency. The idea is that such programs impose a taxation on earnings, which negatively impact labor supply behavior and foster single-adult household formation. Mixed research findings, likely attributable to research and design bias, leave practitioners and welfare program designers with important elements to consider.

#### a) Willingness To Work

DHA designed an outreach strategy intended to elicit preliminary preferences and attitudes regarding current marginal tax rate and its relationship to willingness to work. Outreach efforts sought to explore how the proposed rent policy would impact participants' willingness to work, their consumption of goods, and locational decisions. While it is important to note that attitudes could differ from behavior, the comparative picture drawn remains essential to policy development efforts. Three major surveys were administered to MTW-eligible voucher holders. 84% of the respondents expressed feeling "discouraged" and "stuck" when their rent increases as a result of a growth in earnings. Similarly, 64% of respondents reported that they would not



be more motivated to engage in the labor market because of the increased income-increased rent mechanism. Conversely, 88% of respondents reported that they would feel "encouraged" and "motivated" if their rent would not increase as a result of an increase in income; and 74% would be extremely/very motivated to actively engage in the labor market to earn more. HCV families also indicated that if their rent does not increase with income, they would use their additional income to (in order of response frequency) pay bills, pay debts, cover daily necessities such as groceries and gas, and finally, families would save that additional income. While results seem to favor the dominant discourse that income-based housing subsidies induce work disincentives, DHA remains sensible to the fact that marginal tax rate impacts, attitudes, and induced behaviors (i.e., labor supply responses), are likely to vary across household types. As such, DHA embraces the premise that variations are also likely to be tied to the "packaging" of housing assistance, which also involves the provision of supportive services to advance the proposed policy. Thus, DHA also assessed ways in which barriers to labor market engagement and neighborhood choice could be alleviated through MTW programming.

#### b) Labor Market Engagement

DHA is also sensible to the idea that labor market engagement is likely to be affected by educational attainment, access to information, professional experience, intrapersonal skills and the like. And similarly, upward mobility and access to social and economic opportunities is affected by barriers to housing choice. HCV survey respondents expressed needing assistance with education (19%), finding training and apprenticeships opportunities (17%) and connecting with employers and jobs directly (22%). DHA's assisted families disproportionately reside in low-upward mobility neighborhoods likely to fuel intergenerational poverty and dependence on governmental assistance.



#### c) Neighborhood Choice

The HCV program is not only designed to ensure affordability through direct subsidy but to also give recipients greater locational choices, opening the door to better neighborhoods and improved access to job and educational prospects. However, research shows that DHA's assisted families disproportionately reside in low-upward mobility neighborhoods. Abundant research shows that voucher holders would like to move to higher-opportunity neighborhoods but often are unable to do so. Our research corroborates the dominant literature where surveyed families living in the most impoverished and segregated neighborhoods. Voucher holders identified barriers to better opportunities as the lack of assistance with moving costs and deposits (31%), lack of connection with landlords (28%), and difficulty identifying opportunity areas (21%).

#### d) Sensitivity To Proposed Policy Incentives

A great majority of survey respondents were responsive to the proposed rent structure and associated incentives. 90% of respondents indicated a definite (72%) or probable (18%) likelihood of living in high-opportunity areas if their rent increases at a smaller rate than in a lower-opportunity area. 94% of families also reported that they would be definitely (56%) or probably (38%) more motivated to earn more/search for a better paying job knowing that their rent increases every year.

#### 2. Profile From MTW-Eligible Population

#### a) Family Structure, Unemployment Rate, and Earned Income Figures

DHA identified over 8,000 families potentially eligible to participate in the Rent Reform demonstration program, including 6,758 HCV clients and 1,570 public housing residents. To further inform its MTW program design, DHA first built a sociodemographic profile of the

MTW-eligible HCV population to assess current unemployment rate, income distribution, and family structure.

#### At a glance:

For the purpose of this analysis, a household is considered "eligible" if their head of household is under age 55 and does not have a disability. An individual is said to be eligible if their head of household is eligible. When evaluating unemployment trends, and the number of adults in the households, eligible individuals (non-head of household) who are over the age of 55 and/or with a disability are excluded. The analysis performed excludes all special vouchers, and represents a subset (+5,800) of all MTW-eligible HCV households (+6,700).

#### Individuals (Eligible Adults)

- Number of individuals: 8,314
- Unemployment rate: 60%
- Number of unemployed individuals: 4,978
- Average Income: \$8,500
- Median Income: \$0
- Average Nonzero Income: \$21,199
- Average Wage for Employed Adults: \$10/hr.
- Median Nonzero Income: \$20,020

#### **Eligible Households**

- Number of households: 5,831
- Average number of adults in household: 1.5
- Number of zero-income households: 2,741
- Unemployment rate: 47%
- Average Income: \$12,175
- Median Income: \$4,800
- Average Nonzero Income: \$22,976
- Median Nonzero Income: \$21,554

#### **Findings Summary:**

Because DHA proposes a rent formula decoupled from income and anticipates that the benefits are likely to vary across households, it is critical to explore trends at both the individual and household levels, and to account for household size and family structure (number of adults in household).

Our analysis reveals that a great share of MTW-eligible individuals are unemployed (60%). We found that unemployment rate seems to increase with household size, and with the number of adults in the households. In other terms, larger households and households with more adults tend



to have significantly greater unemployment rate. This suggests that the potential for gains exists for larger households /multiple adults-households. Average unemployment rates for individuals in multiple-adults households vary from 56% to 85%.

Overall, the average annual individual income is \$8,500. For employed individuals only, the average income is \$21,180. Wages for employed individuals vary from approximately \$7 to \$17, with a \$10/hour wage average (minimum wage in Texas is set at \$7.25). This suggests gains can also be realized for currently employed individuals, and employment growth strategies should focus on enhancing skills and competitiveness for higher-wage employment opportunities. To summarize, our analysis shows that a great share of DHA-assisted individuals are currently unemployed, and sizable gains could be realized for both unemployed and low-wage employed individuals for even greater cumulative gains at the household level.



Figure 6





Figure 8



# b) A comparative picture between HUD-assisted households and HUD-eligible households not receiving housing assistance

Housing assistance is intended to not only alleviate affordability pressures and housing insecurity but also to act as a vehicle to enhance quality of life and foster upward mobility long-term. In an attempt to shed light on this, we draw a comparative picture between HUD-assisted households and eligible households not receiving housing assistance.

Leveraging data from the American Housing Survey (2019), we performed a series of statistical analyses, including difference in means and regressions, to compare two groups in the DFW region: (1) HUD assisted households and (2) income-eligible households not receiving housing assistance. The comparisons are made across households and individuals.

We found that:

- HUD-assisted households tend to have a lower educational attainment than those eligible not receiving assistance.
  - There is a statistically significant difference between HUD-assisted households and non-assisted eligible households where non-assisted households tend to have a Bachelor degree (6% vs. 21%)

 HUD-assisted households tend to have a lower income than those eligible not receiving assistance.

> • There is a statistically significant difference between HUD-assisted households and non-assisted eligible households where non-assisted households tend to earn more (\$19,649 vs. \$29,794)



- HUD-assisted households tend to have a lower number of adults in the households
  - than those eligible not receiving assistance.
    - There is a statistical difference between HUD-assisted households and nonassisted eligible households where non-assisted households tend to a greater number of adults in the household (1.4 vs 1.7)

> Results suggest that HUD-assisted households tend to underperform non-assisted households in terms of educational attainment and earned income.

We found that:

- HUD-assisted individuals tend to have a lower educational attainment than those eligible not receiving assistance.
  - There is a statistically significant difference between HUD-assisted individuals and non-assisted eligible individuals where non-assisted individuals tend to have a High School degree (4% vs. 29%)
- HUD-assisted individuals tend to have a lower income than those eligible not receiving assistance.
  - There is a statistical difference between HUD-assisted individuals and non-assisted eligible individuals where non-assisted individuals tend to earn more (\$6,928 vs. \$22,670)
- > Results suggest that HUD-assisted individuals tend to underperform non-assisted individuals in terms of educational attainment and earned income.



Demographic Comparisons Among Households				
	HUD-assisted households	Income Eligible, not receiving HUD assistance	Household Income Ineligible	
Total Households Numbers	67	419	293	
Percentage with High School Diploma or Equivalent	70%	79%	94%**	
Average Household Income	\$19,649	\$29,794**	\$97,740**	
Number of People in Household	2.13	2.41	2.42	
Number of Adults in Household	1.4	1.7**	1.9**	
Total Rent	\$716.12	\$966.26**	\$1,327.6**	
Head of Household Age	50	43**	41**	
Method: Bonferroni ANOVA test **: statistically different from HUD-assisted households group				

Table 1: Comparisons between HUD-assisted and income eligible non-assisted households

Figure 9

#### Table 2: Comparisons between HUD-assisted and income eligible non-assisted households

Demographic Comparisons Among Individuals				
	HUD-assisted individuals	Income Eligible, not receiving HUD assistance		
Total Households Numbers	143	1,628		
Percentage with High School Diploma or Equivalent	66%	83%**		
Average Age	31	31		
Average Earned Income	\$6,928.08	\$22,670.38**		
Percent Non-White	83%	33%**		
Method: Bonferroni ANOVA test **: statistically different from HUD-assisted households group				

Figure 10

To further test the robustness of these results above, we ran three sets of regressions where we looked at the effect of having housing assistance on 1) attaining a high school diploma or equivalent, 2) attaining a bachelor's degree, and 3) personal earned income. The analysis is performed at individual level data, while controlling for a series of demographic variables in an attempt to isolate the effects of receiving housing assistance on these quality-of-life metrics. After controlling for various demographic and socioeconomic variables, we found that the effect of receiving housing assistance on educational attainment persists even after controlling for race, household income, and gender. The significant negative effect of receiving housing assistance on earned income also remains after controlling for demographic and socioeconomic variables. The size of this negative effect, however, while still statistically significant is almost halved once we control for educational attainment. This suggests that the earned income gap among individuals who receive housing assistance and individuals who are eligible for it but do not receive it can be partially attributed to the gap in educational attainment between these two groups.

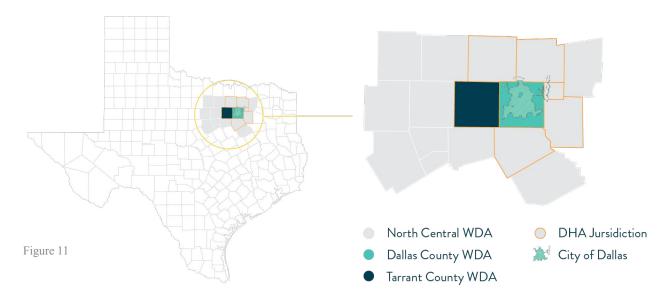
Our analysis points to the importance of the educational gap between these two groups and how this gap can affect differences in earned income as well. This evidence suggests that our agency should focus efforts to help reduce educational gaps by leveraging existing partnerships with educational providers and strengthening support systems for children and adults moving forward.

#### 3. Market Conditions and Projections 2026/2028

Because the MTW program aims at incentivizing and supporting self-sufficiency and housing choice, DHA gave critical considerations to not only current patterns of unemployment within its population, as explored in the previous section, but also considered labor market conditions and projections for the next decade.

DHA's seven-county jurisdiction overlaps with three Workforce Development Areas (WDAs) as

defined by The Texas Workforce Commission, namely: Dallas WDA, Tarrant WDA, and North Central WDA. The data presented in this section has been extracted from the Texas Workforce Commission (TWC) which offers labor market and career information for the State of Texas. This section looks at labor market projections within the context of the MTW program only. As TWC's tracking tool signals somewhat of a COVID-recovery trend in unemployment rate between 2020 Q3 and Q4 (13% to 6%), DHA will continue to monitor projections to refine and inform its employment-related strategies as data become available.



#### Overview

Data from the TWC suggest that the State of Texas will register an employment growth of approximately 16.6% from 2016 to 2026, adding a total of 2,136,000 jobs. The three WDAs within which DHA families reside are projected to register an even higher rate. It is important to note that the North Central Counties also expand beyond DHA's jurisdiction. Taking a closer look at the WDA-specific projection, Dallas County is projected to experience an employment growth of 16.7% by 2026, adding 298,000 jobs. Similarly, an additional 157,000 jobs are expected to be added in Tarrant County, representing 16.8% growth. Finally, North Central WDA

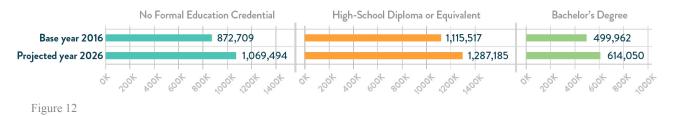


is expected to add 269,000 jobs – that is 27.1% growth from 2016. It is important to note that the North Texas region, and the State of Texas in general, continue to be attractive destinations for out-of-state, high-skilled workers, contributing to its growth in population and overall competitive market.

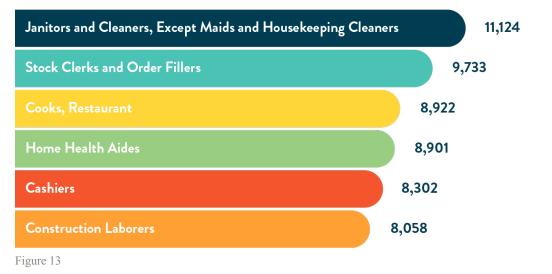
#### **Zoom Into Education-Specific Projections**

Leveraging TWC's projected and latest employment numbers, job openings and Help Wanted Online postings, DHA created a tailored labor market demand report by occupation and education level. The following figure focuses on 2016-2026 job projections requiring (1) no formal educational credential, (2) a high school diploma or equivalent, and (3) a bachelor's degree.

#### Education



Overall, 23% growth (+196,785 jobs) is expected for occupations with no formal educational credentials required. The occupations with the highest change in employment are the following: janitors and cleaners, stock clerks and order fillers, cooks, home health aides, and





cashiers. Overall, a 15% growth (+117,668 jobs) is expected for occupations requiring a High School degree of equivalent with the highest change in employment for customer service representatives, office, clerks, medical secretaries, sales representatives, and maintenance and repair workers (Figure 14).

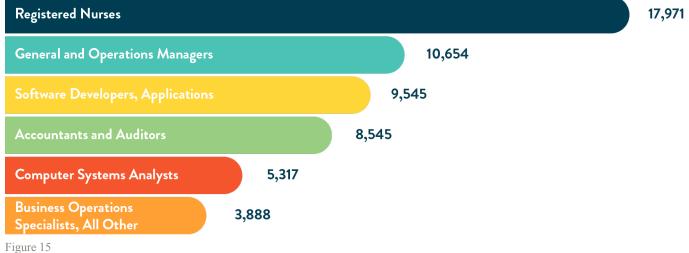


Figure 14

Finally, 23% growth (+114,088 jobs) is expected for occupations requiring a bachelor's degree.

The occupations with the highest change in employment are registered nurse, operations

managers, software developers, accountants, and computer system analysts. (Figure 15).





Here are the top three fastest growing industries in the WDA where voucher families reside. It is important to note the geographical variations and shared projected growth of support services related occupations.

- **Dallas WDA:** Support activities for mining (+110%), Special food services (+51%), and Freight transportation arrangements (+49%)
- Tarrant WDA: Religious organizations (+54%), Chemical manufacturing (+47%), Support activities for rail transportation (+43%),
- North Central WDA: Computer systems design (+79%), facilities support services (+79%), Medical and diagnostic laboratories (+77%)



**B. Explanation of how the policy will: incentivize assisted households to increase their** <u>income; protect those households that experience hardships; and reduce administrative</u> <u>burden on the PHA</u>

#### **Overview**

A stepped-rent policy is not based on income, but rather on Fair Market Rent (FMR) estimates.

Each year, households advance to the next step. Below is an illustration of a 5% stepped rent

policy, which means every year a household's rent portion increases by 5% of the FMR.



Figure 16

In 2011, DHA was the initial participant in the SAFMR Demonstration Program, which provides HCV families greater access to resource-rich areas often characterized by greater opportunities for employment, higher-performing schools, and additional public amenities.

To further encourage and support participants to move to opportunity-rich neighborhoods conducive of self-sufficiency, **DHA proposes a mixed stepped rent policy** with 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.





Figure 17

#### Purpose

DHA recognizes that the Brooke Amendment income-based rent formula may create a disincentive for program participants to work or to advance at work. When a participating tenant becomes employed, their rent portion increases commensurately with their increased income, making it harder for families to leverage their increase in income to enhance their quality of life. The primary benefit of the proposed MTW rent reform policy is that families who experience an increase in income will not experience an immediate increase in rent as a result of their employment achievements. DHA believes that the proposed rent policy will empower 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.

Along with the rent reform, DHA will provide participating families (both in the treatment and control groups) with robust self-sufficiency programs to support educational and employment growth while addressing impediments to economic growth, to create tangible pathways to self-sufficiency. DHA will also provide \$3 million in mobility counseling services to assist families with moving to high-opportunity areas.

#### Who Can Participate in the MTW Program?

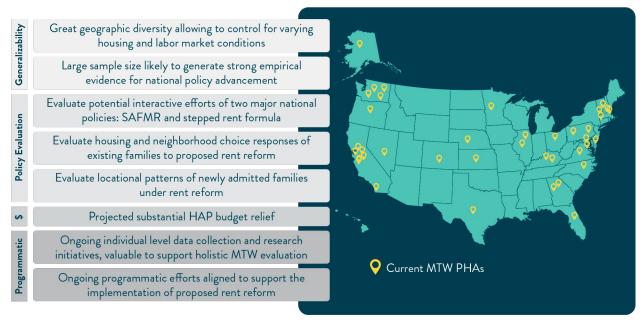
Eligible households include currently assisted households in DHA's Housing Choice Voucher Program and new households admitted into the voucher program during the alternative rent enrollment period. Elderly and disabled households, families in the Family Self-Sufficiency program, and Public Housing residents 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 (participant contribution is 30% of adjusted income) or the experimental group that pays rent based on DHA's proposed MTW rent reform (stepped rent, based on SAFMR as described in this section).



# <u>C. Demonstration that the policy: is feasible; might be of interest to other PHAs and the</u> housing policy community; and complies with the parameters set in Attachment 1

DHA is uniquely positioned to generate strong empirical evidence to foster public policy advancement. The seven-county jurisdiction 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.



### **RESEARCH MERITS OF PROPOSED POLICY**

Figure 18

DHA believes this process complies with the Cross-Cutting Provisions in Notice PIH 2019-04, but will work with HUD to revise it if necessary. As demonstrated in the preceding sections, DHA has conducted extensive research to evaluate the feasibility and fitness of the proposed MTW policy. Our proposed policy is a mixed-stepped rent, which fundamentally borrows its core features from HUD's MTW Test Rent #2. The distinctive trait of our proposed policy is that the step rate varies across ZIP codes, depending on their categorization as being either a high- or low-opportunity one. Because the ZIP code categorization is determined and set prior to implementation, the use of a mixed-step rate does not create unmanageable/volatile variability. Rather, the use of a mixed-step rate is actually predictable, and the use of deterministic algorithms in Yardi will automate the payment schedule determination because the ZIP code conditions are set up-front. In sum, because our proposed policy is fundamentally a modified version of a fixed step rate policy (MTW rent #2), it remains feasible.

Overall Objectives:	The policy must be designed to incentivise assisted households to increase their earnings and move towards self-sufficiency. PHAs are also encouraged to use the policy to achiece simplification and improved administrative efficiency, to the extent practicable.	$\checkmark$
Year 1	The rent that each household pays in the first year of the stepped rent schedule must have some relation to their ability to work towards self-sufficiency. Income at baseline is HUD's preferred proxy, but the PHA may propose an alternative method for determining year one rent. The PHA should not require all households to pay the same rent in year one.	$\checkmark$
Income-Rent Connection	After year one, rents must not increase based on a household's income. The PHA may use regular income reexaminations to reset rents and mitigate hardships, but only when a household's income is stagnant or decreasing.	$\checkmark$
Stepped Rents:	The PHA may decide what form the stepped rents take. The PHA could simply set an annual stepped rent increase (as under MTW Test Rent #2). The PHA could establish a stepped rent "schedule" as envisioned the two stepped rent policies HUD presented in Notice PIH-2019-04. Rents could increase less often than every year. However, the policy may not force a rent increase larger than 10% of the Fair Market Rent in any year.	$\checkmark$
Maximum Rent (Final Step):	The PHA may decide whether to set a maximum rent (the final step in the schedule), and at what level. The maximum rent should be appropriate for the PHA's housing market. In low-cost housing markets, it may be appropriate to have the maximum rent set at the FMR. In higher-cost housing markets, it may be more appropriate to have the stepped rent policy culminate in an ongoing shallow subsidy.	$\checkmark$
Hardship Policy:	The PHA must have a hardship policy that provides rent relief to households that experience an involuntary loss of employment or income. HUD strongly recommends that the PHA also have some hardship provision for households that cannot increase their earnings enough to keep pace with the scheduled stepped rent increases. The hardship policy must also attempt to prevent any household from being evicted as a result of the stepped rent policy. If a household cannot make their rent payments under the stepped rent policy, and other hardship provisions do not resolve their situation, the household should be returned to the Brooke rent for one year. After a year the PHA can reevaluate the household and may resume the stepped rent.	$\checkmark$

D. Explanation of how rents will be set initially; how rents will change over time; how the alternative rent can be beneficial for assisted households; and how the policy will help assisted households if they experience a hardship

#### How Does it Work?

DHA will submit 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. Below is the projected timeline for MTW participation; please note that dates are subject to change:



Figure 20

#### Transitioning from current policy to proposed MTW rent policy

Families selected to participate in the MTW program under the proposed MTW rent policy, which is in the "treatment group," will need to first be set up on a payment schedule. All payment schedules will be determined prior to launching the program, which means that for each and every ZIP code and bedroom size, there is a corresponding payment schedule. The first year, families will have their income certified and will be placed on their ZIP code payment schedule step the closest to, not to exceed, 30% of their income. For example, if year 1 recertification



shows that 30% of Tania's income is \$245, then Tania will start on step 2, which is the closest to that amount, without exceeding it.

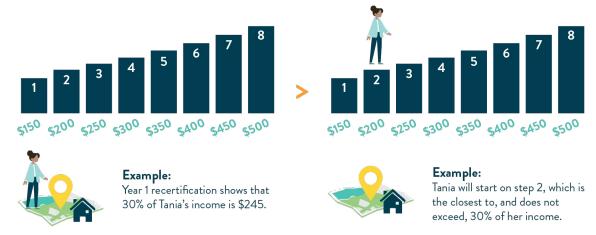


Figure 21

In sum, for the first year, families entering the program will have their income certified, and will be placed on the payment schedule step closest to, not to exceed, 30% of their income. The following year, the family will move to the next step on the schedule, unless granted hardship.

#### **Defining High-opportunity Neighborhoods**

DHA proposes a mixed stepped rent policy with a lower step in higher-opportunity ZIP code FMRs. Methodologically, FMRs are categorized into two groups: low- and high-opportunity FMRs and assigned a rate where high FMRs have a lower step rate (3%) than low FMRs (5%). When considering a suitable categorization methodology between low and high opportunity neighborhoods, DHA is considering (1) the robustness and validity of the metric, (2) the ease of implementation for PHAs across the country, and (3) ease of understanding for HCV families. DHA is currently focused on option 1 and continues to explore other options in meeting the three aforementioned goals.





Figure 22

**Option 1:** Because higher rent ZIP code FMRs have been associated with higher opportunity (using a series of opportunity metrics such as job proficiency), DHA is opting to use SAFMR to distinguish low-opportunity from highopportunity areas. Methodologically, SAFMR estimates are ranked from lowest to highest, and the midpoint of the ranking order is used to make the classification.

**Option 2:** In partnership with Harvard's research group, Opportunity Atlas, DHA is currently exploring transforming upward mobility metrics from the Opportunity Atlas to derive a ZIP code level metric, easy to use for PHAs across the country.

#### 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. **Onboarding hardship policy:** This hardship policy can be requested by zero-income households for whom the initial onboarding 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 onboarding hardship policy will allow qualified households to maintain their current rent payment (their rent payment before the institution of the MTW rent reform formula) for up to (3) three months. After (3) three months, they will be responsible for paying the rent portion 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. Example hardships based on comments received include national and/or state declared natural disaster, health-related issues, death, and circumstances out of the household's control resulting in extraordinary financial distress and the household's inability to pay rent according to their rent schedule. If granted, the rent payment will be reset to the step closest to 30% of the family's income.

**Zero-income hardship policy:** This policy can be requested by zero-income households who (1) have demonstrated good-faith efforts in securing employment, 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. **Rent burden policy:** A household will receive a hardship if their rent burden exceeds 40% of their current/anticipated total annual gross income.

**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 evidence-based criteria mentioned above. DHA anticipates refining hardship policies in partnership with HUD and the community to provide temporary rent relief to avoid eviction or other similar consequences.

#### What happens when there is...

#### An increase in income?

Under the proposed MTW rent reform policy, a tenant's rent portion is based on ZIP code FMR and not on his/her income. Therefore, if a tenant increases his/her income, this does not affect his/her rent. The tenant will continue to make payments according to his/her schedule, unless the

tenant requests and qualifies for hardship. The final step on the rent schedule will be at 100% of the SAFMR, however, in no case will the family pay more than the contract rent for the unit.

#### No income increase?

Under the proposed MTW rent reform policy, a tenant's rent portion is based on ZIP code FMR and not on his/her income. Therefore, if a tenant does not increase his/her income, this does not affect his/her rent. The tenant will continue to make payments according to their schedule, unless the tenant requests and qualifies for hardship. If granted, the tenant will be reset on step closest to 30% of his/her income.

#### Loss of income or zero income?

Under the proposed MTW rent reform policy, a tenant's rent portion is based on ZIP code FMR and not on his/her income. Therefore, if a tenant loses their income, this does not affect his/her rent. The tenant will continue to make payments according to their schedule, unless the tenant requests and qualifies for hardship. If granted, the tenant will be reset on step closest to 30% of his/her income or will be paying minimum rent if it is a zero-income household.

#### An increase in rent by the landlord?

Under the proposed MTW rent reform policy, a tenant's rent portion is based on ZIP code FMR and not on his/her income, nor rent. Therefore, if a landlord increases rent (and it does not exceed payment standard and passes reasonableness test), this does not affect the tenant's rent. The tenant will continue to make payments according to his/her schedule, unless the tenant requests and qualifies for hardship. The final step on the rent schedule will be at 100% of the SAFMR, however, in no case will the family pay more than the contract rent for the unit. ZIP code FMRs are set to remain the same for five years. If SAFMR estimates are updated, schedules will be updated accordingly.



#### A tenant who relocates?

If a tenant relocates to a different ZIP code, then she will be placed on the corresponding payment schedule for that ZIP code and bedroom size. The tenant will be placed on a step that is the closest to, and not to exceed, current payment. If Tania currently lives in ZIP code "A" and pays \$350 toward her rent; if she then relocates to ZIP code "B", she will be placed on step 5, and will pay \$340, which is the closest, not to exceed, to her current/past payment in her previous ZIP code.

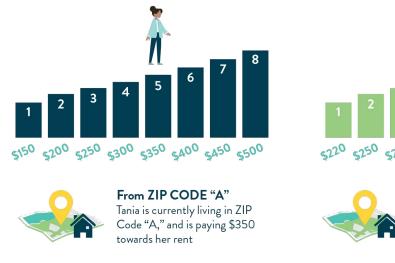




Figure 23

#### After Recertification

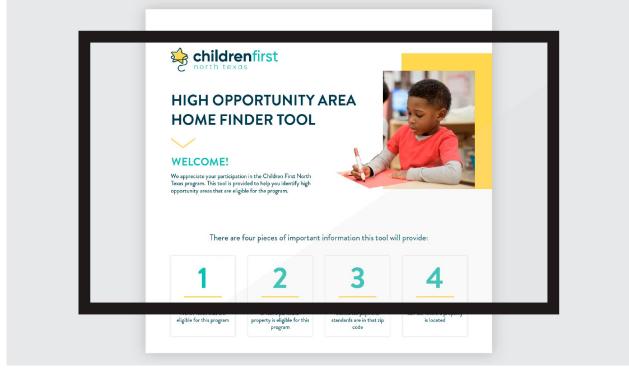
Income reexaminations would occur every three years. The purpose of these reexaminations would be to verify eligibility, not to calculate rents. If a household's income at reexamination is high enough to affordably rent a unit at the FMR, they will no longer be eligible for assistance. That is, if a household's monthly income times 30% is greater than the FMR for their household/ unit size, they would be required to exit assistance.

#### Navigating Rent Schedules

DHA will prepare a step rent schedule for each ZIP code based SAFMR (approximately 354 ZIP



code areas). Tables will be established for a five-year period and updated during the PHA/MTW Plan process. For lower-opportunity areas, tables will begin at 15% of the SAFMR by bedroom category and will increase annually by 5%. For higher-opportunity areas, tables will begin at 8% of the SAFMR by bedroom category and will increase annually by 3%. Families relocating from one SAFMR area to another will have their rent set at the step rent in the new SAFMR area closest (rounded down) to what they would be paying if they had remained in their original unit. DHA has designed a North Texas home-finder tool. In essence, the home finder allows a family to enter an address in the search bar, and the tool will return whether the address is within a highopportunity area, and its corresponding SAFMR for each bedroom size. DHA anticipates adding all payment schedules to the tool, so families can navigate the SAFMR landscape and make decisions understanding the implication for their payment schedule.





### Walk-through Example

For example, a family requiring a two-bedroom unit enters the MTW Rent Reform program in the treatment group. In Year 1, the tenant rent, calculated under the current income calculation method, is \$310. The family resides in West Dallas in ZIP code 75212, a Non-High Opportunity Area. Based on the example Rent Schedule Table below (showing only the first six steps), during Year 1 the family's Tenant Rent will be set at step 4 (\$282 per month) of the 75212 schedule as the rent is rounded down. Should the family remain in this unit, its rent will increase by 5% of the 75212 SAFMR annually.

Example SAFMR Table:

STEP	YEAR 1		YEAR 2		YEAR 3	
	West Dallas		Plano		Frisco	
	ZIP code: <b>75</b> 2	212	ZIP code: <b>750</b>	024	ZIP code: <b>75</b>	034
	Low Opportu	nity Area	High Opport	unity Area	High Opport	unity Area
	5% Incremen	ts	3% Increment	ts	3% Incremen	ts
		2 BR 2019 SAFMR		2 BR 2019 SAFMR		2 BR 2019 SAFMR
	% FMR	\$940	% FMR	\$1,800	% FMR	\$1,580
1	15%	\$141	8%	\$144	8%	\$126
2	20%	\$188	11%	\$198	11%	\$174
3	25%	\$235	14%	\$252	14%	\$221
4	30%	\$282	17%	\$306	17%	\$269
5	35%	\$329	20%	\$360	20%	\$316
6	40%	\$376	23%	\$414	23%	\$363



In Year 2, the family moves to Plano, ZIP code 75024, a High Opportunity Area. The family's Tenant Rent is set at step 4 of the 75024 Rent Schedule (\$306) as it is the nearest (rounded down) to what the family would have paid if it had remained in its Year 1 unit (\$329). If the family remains in this unit, its rent will increase by 3% of the 75024 SAFMR annually. To complete the example, in Year 3, the family moves to Frisco, ZIP code 75034, another High Opportunity Area. For Year 3, the family's tenant rent will be set at step 5 of the 75034 Step Rent Schedule (\$316) as this step is the nearest (rounded down) to what the family would have paid if it had remained in its Year 2 unit (\$360). Again, should the family remain in this unit, its rent will increase by 3% of the 75034 SAFMR annually.

Should the family downsize to a one-bedroom unit or increase to a three-bedroom unit, its rent will be recalculated based on the gross rent and SAFMR corresponding to the new size unit. It is important to note that families will undergo income examination as they enter the program and then triennially. After the first year, income reexamination will only be used to verify program eligibility, not to calculate rent. Further, unit inspections will occur biennially for families remaining in the same unit.

*Note: DHA believes this process complies with the Cross-Cutting Provisions in Notice PIH 2019-*04 but will work with HUD to revise it if necessary.

#### **Coupling self-sufficiency programming with Rent Reform**

The following section depicts past and current programmatic efforts to support self-sufficiency. DHA is committed to enhancing the welfare of the families it serves and to removing barriers to self-sufficiency. Over the last few years, DHA increased its focus and resources toward the development of data-driven strategies designed to support Housing Choice and to incentivize relocation to higher-opportunity neighborhoods for existing families. Thus, DHA established a



Policy Development and Research (PD&R) department responsible for developing evidencebased strategies to combat segregation and poverty, foster upward mobility, and enable systemwide 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.

#### i. Brokering Employment Opportunities for DHA Families:

*Background:* A major employer expanding into the Dallas marketplace created over 400 jobs to be filled in the Southern sector of Dallas. A public job fair was scheduled for candidates to attend for potential interviews. Over 600 candidates were expected to attend and apply.

*Methodology:* **Baseline Analytics:** In an effort to broker opportunities for the families we serve, DHA's PD&R department conducted a series of analyses to identify among its population working-age individuals (non-elderly, non-disabled) residing in proximity to the employment hub, unemployed or earning less than the offered wages. PD&R then assessed whether DHA-assisted individuals are located within acceptable distance to transit, critical to sustain access to employment and meet commuting needs for transit-dependent population.

**Outreach:** After consulting with the recruiting agency to determine employment requirements and preferences, DHA's PD&R team developed an outreach strategy designed to identify interested and qualified candidates, while assessing potential barriers to employment access and retention such as access to transportation, childcare, professional clothing, etc. Concurrently, DHA brokered memorandums of understanding (MOUs) with major support service providers in Dallas to assist families with these challenges. Survey respondents expressed interest in the



available positions, self-assessed their skills proficiency, and self-reported their job experiences and need for assistance. Finally, PD&R categorized and identified competitive candidates (+200) while linking all survey respondents with service providers for assistance where needed. *Outcomes:* Upon reviewing the report presented by PD&R, the recruiting agency set up 80 interviews one week prior to the public job fair event 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.

**MTW application:** DHA anticipates scaling up this successful pilot program to support MTW families as they compete in the job market place. DHA anticipates partnering with key partners such Workforce Solutions of Greater Dallas, Dallas College, and the City of Dallas to develop a robust system to support HCV labor force participation and economic growth.

#### ii. Fostering Housing Choice and Upward Mobility: Children First North Texas Program

*Background:* After two years of research and operations design, DHA launched in 2020 a program named "Children First North Texas" (CFNTX) focused on HCV families with children living in the most impoverished and segregated neighborhoods in our region. The CFNTX program is designed to systematically help these families relocate to high-upward mobility neighborhoods through personalized individual mobility counseling and connection to social services providers using tech-driven, human-centered, CRM automated workflows. *Overview:* The mission of the CFNTX program is to provide opportunities for HCV families and their children to live in higher-opportunity neighborhoods and empower them to break the cycle

of generational poverty. This initiative focuses on mobility counseling and support services with a wide array of social service providers based on the family's needs, eligibility and geographic coverage.

*Operations:* The program was designed by DHA's PD&R department and co-executed with the voucher program staff (Housing Navigators and Housing Brokers). Spatial analyses of residential living patterns with respect to segregation are conducted to identify HCV families living in segregated and impoverished neighborhoods to participate in the CFNTX program. The program starts with an outreach survey designed to gauge neighborhood and school preferences and to collect critical lease information to best strategize voucher issuance for families based on their lease end date, while accounting for the presence of children and school breaks. If a family is eligible and selected for the CFNTX program, they can elect to participate in DHA's Mobility Counseling Program, which starts with an info session, followed by an in-depth needs assessment interview, a voucher briefing, and assistance during the housing search process. Concurrently, a housing broker is actively recruiting landlords in high-opportunity areas to participate in the HCV program.

#### Tech and Process:

The CFNTX program uses the power of technology, Artificial Intelligence, and advanced analytics to pre-set workflows to sort, filter, prioritize and automate the majority of the processes involved with (1) contacting, (2) following up, (3) sorting, (4) assigning tasks, (5) tracking housing search activities, and (6) assessing progress for families and the overall program. In addition, DHA has acquired commercial real estate software to identify available units (in real time), to explore neighborhood amenities at a granular level, and to recruit landlords based on locational preferences and neighborhood quality.





#### Figure 26

*Moving Forward:* 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.

**MTW application:** DHA anticipates providing proactive case management, mobility counseling and to deploy both staff and financial resources to support MTW families' housing choice and search for housing opportunities in their areas of preferences.

#### iii. Assessing and Mitigating Food and Medicine Insecurities During the Pandemic

*Background:* Like many other communities in the country, Dallas has experienced the effects of the COVID-19 pandemic. DHA's concern for the safety of the community, co-workers, and the families we serve prompted a component of our business continuity plan that maintains an optimal level of productivity while following recommendations from local, state, and federal health professionals. Because the well-being and safety of our residents is a top priority, we launched a wellness check initiative for public housing residents to assess their immediate needs, provide resource referrals, and monitor the residents' needs on an ongoing basis. DHA's PD&R



team first identified our elderly population, individuals with disability, children under the age of 13, and individuals at-risk (over the age of 60 and/or with a disability). Second, PD&R looked at the distribution of vulnerable populations across DHA's public housing properties to identify potential clusters and correspondingly, areas of focus.

*Operations:* The first phase of the wellness check outreach prioritized at-risk families. Subsequent phases focused on at-risk individuals and families experiencing food and/or medicine insecurity, with the end goal of conducting the wellness check for all public housing residents and connecting residents with required services. In addition, in the event that a family is particularly vulnerable (due to food insecurity, or health conditions) DHA team members scheduled regular follow-ups with the family to monitor their situation. The continuous wellness check includes ad-hoc adjustments as the COVID-19 situation evolves.

In addition to resident wellness checks, DHA staff built and maintained an in-house database listing organizations providing emergency and/or COVID-related assistance in North Texas. DHA provides our families with the most-up-to date information. Another major database we reference is Aunt Bertha, a search engine for social services, allowing seekers to search based on their ZIP code and eligibility criteria (e.g., income, veteran status). Aunt Bertha offers an extensive directory of social service providers with concise information such as eligibility criteria, hours of service, contact information, and steps for accessing services.

*Outcomes:* DHA staff use these databases to advise public housing residents on how to access the available resources in their communities. During the wellness check initiative, over 1,200 referrals were made. A tracking system was established mid-April to capture the type of DHA family referrals. Please note that information below does include referrals made prior to mid-April (approximately 300).

Figure 27

## DHA COVID-19 RESPONSE

WELLNESS CHECK 📀 POWERED BY CRM PLATFORM



A great majority of public housing residents reported facing food insecurity, representing close to 45% of all inquiries received and triaged. Despite the closing of our offices to non-employees during the pandemic, DHA staff has continued to proactively identify and address technical issues as well as property-related challenges. Each wellness check seeks to capture whether families were able to access the recommended resources during the last check-in. On average, we found that about 40% of DHA public housing families received the help they needed during the pandemic through the wellness check system.

**MTW application:** This technology-based system will enable DHA to meaningfully elicit preferences, needs, and enable personalized assistance for MTW-population while tracking and storing dynamic and time-series data for long-term program evaluation.

#### iv. Self-Sufficiency Programs at DHA

Fostering self-sufficiency is at the 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 leverages



its technological capabilities to reach residents (based on the nature of the communication, eligibility, or location), to meaningfully assess needs and preferences to inform operational investments and design operations. Our technology-based strategies allow large-scale outreach and engagement and are traditionally coupled with on-site activities to build families' confidence and trust, and to meaningfully elicit preferences, needs, and enable personalized assistance. Recent ROSS outreach efforts revealed that health and wellness are a top priority for DHA residents, and accordingly DHA is pursuing programmatic/grant opportunities to address such needs. DHA strives to proactively and meaningfully engage its residents and its Resident Advisory Board and launches regular survey campaigns to capture the community's needs, insights, and feedback on current operations and upcoming initiatives.

**MTW application:** DHA will leverage its long-term experience and expertise in administering self-sufficiency-focused activities, as well as their developed network of trusted partners to assist MTW families in achieving economic independence and enhancing their quality of life altogether.

## v. Leveraging Tech and Advanced Analytics to Incorporate Mental Health into Housing Operations for HUD-assisted Families

Our internal research shows that despite receiving rental housing assistance, low-income families tend to disproportionately reside in low-opportunity neighborhoods, often associated with an increased risk of poor overall health, premature mortality, heart disease, obesity, and mental illness. The inequitable impact of the environmental and social conditions in which people live creates persistent and pervasive health disparities which plague under-resourced populations. 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. DHA is committed to the pursuit of innovative, data-driven policies and programs effectively bridging systemic inequities and enhancing the quality of life of low-income families in North Texas. Thus, DHA seeks to develop a 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 underresourced communities. DHA's working group, including North Texas Behavioral Health Authority (NTBHA) and the University of Texas at Arlington, seeks to leverage DHA's Customer Relationship Management (CRM) technology, automation, and artificial intelligence capabilities to bridge the realms of housing and health with timely assessment and intervention for behavioral health concerns for residents of public housing and low-income families at-large. DHA seeks to capitalize on its proximity to low-income families and at-risk population to maximize the benefits of housing assistance by coupling it with a robust, data-driven, integrated health and resource referral system. The plan is intended to build technological capacity to avoid bottleneck challenges, maximizing our collaborative impact by not only serving DHA individuals  $(\sim 55,000)$  but also vulnerable families who are seeking housing assistance by accessing DHA's website (waitlist:  $\sim >100,000$ ).

The projected workflow will be designed to not only assess behavioral health needs, but also 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). DHA intends to leverage its position as a major traffic hub for low-income families in North Texas to offer this web-based assessment and associated workflows to not only the families

it serves, but resource-challenged individuals accessing its website. DHA will couple these technological investments with targeted, human-centered programming at its properties by addressing behavioral health access and education, food and medicine insecurities, other social determinants of health, as well as challenges associated with distance learning. In addition, to fully integrate behavioral health into its organizational culture and competency, our collective will focus on agency-wide Mental Health First Aid training, seeking state Community Health Worker certification for staff dedicated to DHA's self-sufficiency program, and the hiring of licensed clinical social workers (LCSWs) to provide expertise and insight from within.

**MTW application:** DHA anticipates leveraging grant funding to unlock resources to tackle mental health challenges for families electing to participate in health-focused programs.



E. Explanation of why the PHA's policy is different from the HUD-proposed options in MTW Test Rents #1 and #2 and why it would be better suited for the applicant PHA. HUD expects any PHA-proposed policies under MTW Test Rent #3 to offer an interesting and important contrast with the HUD-proposed policies in MTW Test Rents #1 and #2

#### 4. Policy Formulation

**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, unemployment patterns in HUD population, 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 moving to opportunity-rich areas that are conducive to economic self-sufficiency. In fewer terms, location matters. DHA already operates under a place-based strategy: Small Area Fair Market Rents (SAFMRs), which call 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 increase in steps varies across ZIP code and FMRs, based on location.
- > **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 code FMR value, a fixed stepped rent structure (MTW Test #2) has the potential to incentivize families to stay or relocate to lower ZIP code FMR areas associated with lower opportunity.
- > **Outcome:** Step rate should vary across ZIP codes based on the opportunity level.

**Policy Structure:** Leveraging its SAFMR policy, and in an effort to incentivize moves to opportunity-rich neighborhoods to foster self-sufficiency, 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 an approach has the 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 mixed stepped rent policy structure.



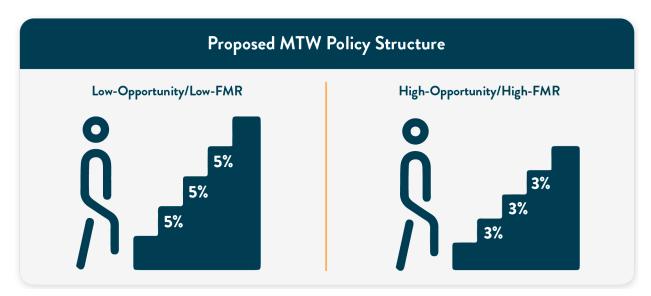


Figure 28

#### 5. Community Feedback on Proposed Policy

DHA is committed to the pursuit of an inclusive process and has designed and implemented a wide array of public engagement strategies to elicit meaningful insight and feedback to inform the development of the proposed MTW program.

Our outreach efforts included a series of electronic surveys and interactive webinars to gauge residents' views about current rent policy as it relates to their ability to move towards self-sufficiency. These efforts aimed to introduce the MTW program's intent and proposed rent policy in a non-technical way. Subsequent efforts sought to dive deeper into the mechanisms, rules, and parameters behind the rent policy. DHA registered unprecedentedly high engagement numbers with over +4,850 survey respondents, and an average of 225 attendees for its webinars<sup>2</sup>. Webinars included embedded interactive survey tools and live questions and answers allowing residents to seek clarification and to provide feedback and engage in real-time. Not only did DHA seek to understand the challenges and shortcomings of the current rent policy from a resident's perspective, but it also elicited direct feedback on the proposed MTW rent policy. To ensure meaningful engagement and to facilitate the audience's understanding of

the functioning of the rent, DHA created a series of scenarios covering key topics such as (1) increase in income, (2) decrease in income, (3) zero-income situation, (4) landlord increase in rent, and how these scenarios affect (A) tenant's change in rent portion, (B) hardship policies, and (C) DHA's role in supporting residents in achieving upward mobility.

Participants overwhelmingly support DHA's proposed policy: 93% in favor for MTW proposed policy, 7% in favor of current rent policy. They prefer the MTW proposed rent policy specifically because an increase in income does not result in an immediate increase in rent; because there is a hardship policy in place in case families are unable to pay rent; and overall, because it allows them to earn more over the years, save, and become more self-sufficient. Because of the strong support and preference of its residents, DHA is pursuing the mixed stepped rent policy.



The goal of this rent reform program is to help you become self sufficient and financially independent from housing assistance. Do you think this program will help you become financially independent and reach self-sufficiency?



Figure 29a

Figure 29b

<sup>2</sup> DHA leveraged its CRM system to automate notices and reminders via emails and texts.





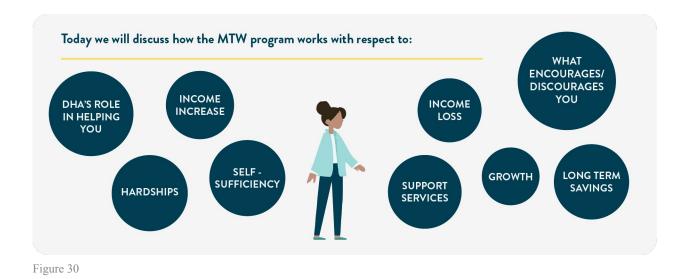
Figure 29c



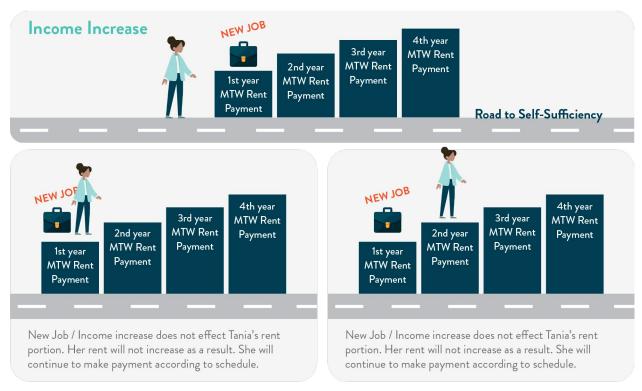
Figure 29d

#### Intro

The following section is an excerpt of DHA's community webinar where the MTW policy was presented in a non-technical way for residents to understand the functioning of the proposed rent policy through known processes such as a change in income or increase in rent.



#### 1. Income Increase:





#### 2. No Income Increase:

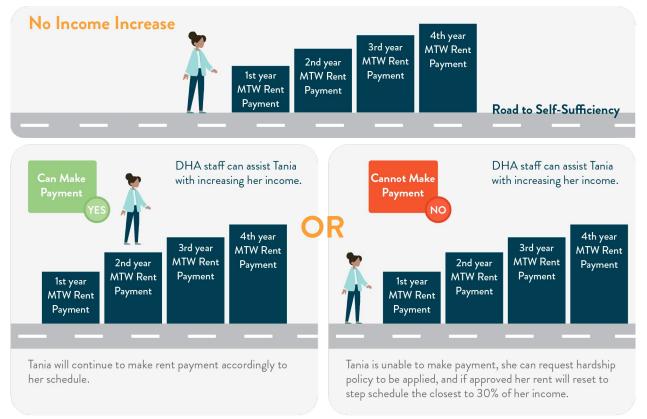
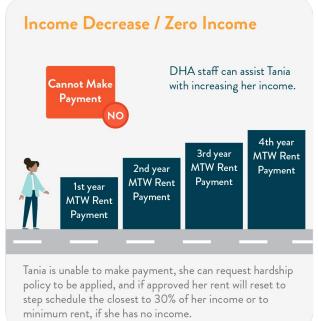


Figure 32

## 3. Income Decrease / Zero Income:



## 4. Landlord Increases Rent:



It does not impact Tania's rent. Indeed, her rent portion is based on ZIP Code Fair Market Rent. The ZIP Code FMR stays the same for 5 years.

Figure 34



#### How it works:

Every year, the rent increases by a small percentage (3% or 5%) of Zip code fair market rent

Example: FMR1BD is \$1,000, 5% increase is \$50

## What Happens When...



#### Tania's income increases?

Tania gets to save her extra income - her rent does not go up until the following year.



S I

#### Landlord increases rent?

It does not impact Tania's rent. Indeed, her rent portion is based on ZIP Code FMR. The ZIP Code FMR stays the same for 5 years.

First

Year

\$90

Third

Year

\$190

Second

Year

\$140

Fourth

Year

\$240

#### Tania's income decreases?

Tania's rent portion stays the same, unless she qualifies for hardship. If she qualifies, her rent will be reset at the step closest to 30% of her income.

We learned that:	<ul><li>93% Prefer Scenario 2 (Proposed MTW rul</li><li>7% Prefer Scenario 1 (Current rule)</li></ul>	e)
	SCENARIO 1: 1. Tania's rent increase the very next month, from \$90 to \$300 2. Next year: monthly rent is \$300 3. Following year: monthly rent is \$300 4. Following year: monthly rent is \$300	INCOME \$30,000
Tania has a DHA voucher. And she just got a new job!	SCENARIO 2: 1. Tania's rent portion does not increase, it stays at \$90. Instead, her portion increases on a yearly basis by a small, regular amount. 2. Next year: monthly rent is \$140 3. Following year: monthly rent is \$190 4. Following year: monthly rent is \$240	INCOME \$30,000

#### Which statement(s) do you agree with?

- 24% A. Scenario 2: Because Tania's rent does not increase as a result of an income increase.
- 27% B. Scenario 2: Because there is a hardship policy in place in case Tania cannot pay her rent.
- 32% C. Scenario 2: Because it allows Tania to earn more over the years, save money, and become more self sufficient.
- 8% D. Scenario 1: Because Tania's rent decreases when she loses income.
- 1% E. Scenario 1: Because Tania should pay more rent if she earns more income.
- 7% F. Scenario 1: Because it allows Tania to earn more over the years, save money, and become more self sufficient.
- 2% G. I do not agree with any of the statements above.



# Appendix 1: Moving to Work Certifications of Compliance

ATTACHMENT 2			
Moving to Wo	rk Certifications	s of Compliance	

<ul> <li>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.</li> <li>(5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program throughout the PHA's participation in the MTW Demonstration Program.</li> <li>(6) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.</li> <li>(7) The PHA published a notice that a hearing would be held, that the application and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the application by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the application and invited public comment.</li> <li>(8) The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards)</li> </ul>		CERTIFICATIONS OF COMPLIANCE			
<ul> <li>other authorized PHA official if there is no Board of Commissioners, I approve the submission of the application to the Moving to Work (MTW) Demonstration Program for the PHA and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the application and implementation thereof:</li> <li>(1) The PHA will adhere to the MTW Operations Notice or successor notice and all requirements therein.</li> <li>(2) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure at least 75% of families assisted are very low-income as defined in Section 3(b)(2) of the 1937 Act throughout the PHA's participation in the MTW Demonstration Program.</li> <li>(3) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in establishing a reasonable rent policy that is designed to encourage employment and self-sufficiency.</li> <li>(4) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to assist substantially the same total number of eligible low-income families as would have been served absent MTW throughout the PHA's participation in the MTW Demonstration Program.</li> <li>(5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program.</li> <li>(6) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.</li> <li>(6) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program.</li> <li>(7)</li></ul>	OFFICE OF PUBIC AND INDIAN HOUSING Certifications of Compliance with HUD and Federal Requirements and Regulations:				
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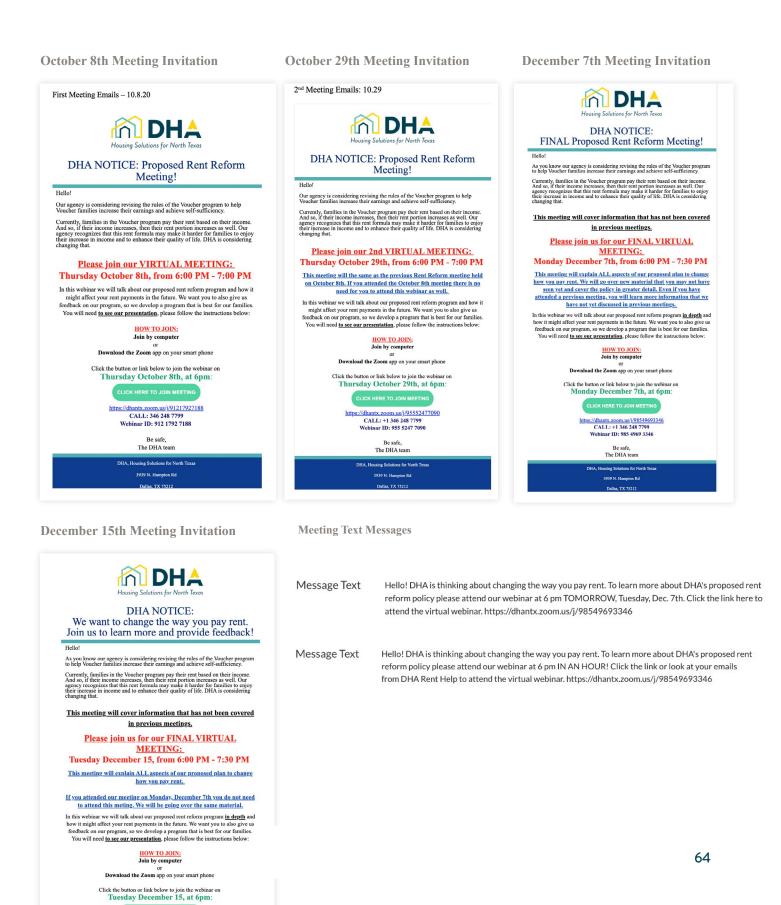
## Appendix 1: Moving to Work Certifications of Compliance

- (9) The PHA certifies that the Board of Commissioners has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (10) The PHA certifies that it will carry out its application in conformity with: Title VI of the Civil Rights Act of 1964 (42 USC 2000d-200d-4); the Fair Housing Act (42 USC 3601-19): Section 504 of the Rehabilitation Act of 1973 (29 USC 794); Title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.); all regulations implementing these authorities; other applicable Federal, State, and local civil rights laws; and that it will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will 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 any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (11) The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2).
- (12) The application is consistent with the applicable Comprehensive Plan (or any plan incorporating such provisions of the Comprehensive Plan) for the jurisdiction in which the PHA is located.
- (13) The application certifies that according to the appropriate State or local officials that the application is consistent with the applicable Consolidated Plan, which incorporates a fair housing strategy that reflects the jurisdiction's AFH or Analysis of Impediments to Fair Housing Choice (AI), as applicable, and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
- (14) The PHA complies with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (15) The PHA complies with the Violence Against Women Act and its implementing regulations at 24 C.F.R. Part 5, Subpart L and Parts 960 and 966.
- (16) The PHA complies with the Architectural Barriers Act of 1968 and its implementing regulations at 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (17) The PHA complies with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (18) The PHA complies with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (19) The PHA complies with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (20) The PHA complies with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (21) The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (22) The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (23) With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (24) The PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.

# Appendix 1: Moving to Work Certifications of Compliance

25) The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.			
(26) The PHA will comply with the requirements of the Uniform Adr Requirements for Federal Rewards at 2 CFR Part 200.	PHA will comply with the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit irements for Federal Rewards at 2 CFR Part 200.		
(27) The application and all attachments are available at the primar locations identified by the PHA in its Plan and will continue to b the PHA.	The application and all attachments are available at the primary business office of the PHA and at all other times and ocations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of he PHA.		
_DHA Housing Solutions for North Texas	<i>TX009</i>		
PHA NAME	PHA NUMBER/HA CODE		
provided in the accompaniment herewith, is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. § 3729, 3802).			
Jorge Baldor	Chairman		
NAME OF AUTHORIZED OFFICIAL*	TITLE		
John	1-6-21		
_ SIGNATURE	DATE		
<ul> <li>Must be signed by either the Chairman or Secretary of the Board signed by an employee unless authorized by the PHA Board to do</li> </ul>	of the PHA's legislative body. This certification cannot be		

# Evidence that public housing residents and HCV participants (as applicable to the PHA's inventory) were notified of the PHA's intention to participate in the MTW Demonstration program



#### Evidence that two resident meetings were held;

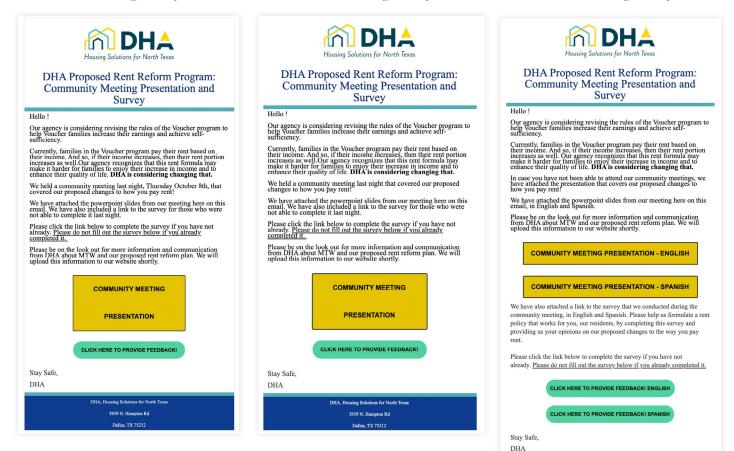
**October 8th Meeting Survey** 

**October 29th Meeting Survey** 

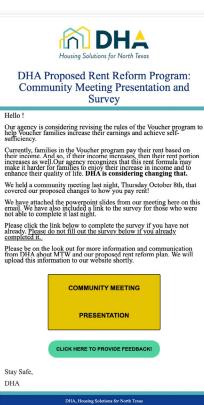
**December 7th Meeting Survey** 

DHA, Housing Solutions for North Texas 3939 N. Hampton Rd Dallas, TX 75212

65



#### **December 15th Meeting Survey**



939 N. Hampton Rd Dallas, TX 75212

#### Evidence that two resident meetings were held;





## Resident Advisory Board October 22, 2020 Agenda

Welcome

Debbie Quitugua, Director of Capital Technical Programs

- Discussion of Mobility Demonstration Grant and Moving to Work Applications Myriam Igoufe, Vice President of Policy Development and Research Maggie Deichert, Director of Policy Development and Research
- Status of The Oaks and Other Development Projects Tim Lott, Vice President of Capital Programs Debbie Quitugua

Discussion of PHA and CFP Plan Documents Debbie Quitugua

- Discussion of Changes in Admissions and Operating Procedures Since the 2020 PHA Plan Brooke Etie, Vice President of Housing Choice Voucher Program Shannon Bramlet, Director of Housing Operations Keytha Nettingham, Director of Housing Operations Jeni Webb, Director of Compliance
- Safety and Crime Prevention Programs in Public Housing Shannon Bramlet, Director of Housing Operations Keytha Nettingham, Director of Housing Operations
- Deconcentration of Poverty Policy Shannon Bramlet, Director of Housing Operations Keytha Nettingham, Director of Housing Operations Jeni Webb, Director of Compliance

#### Adjourn

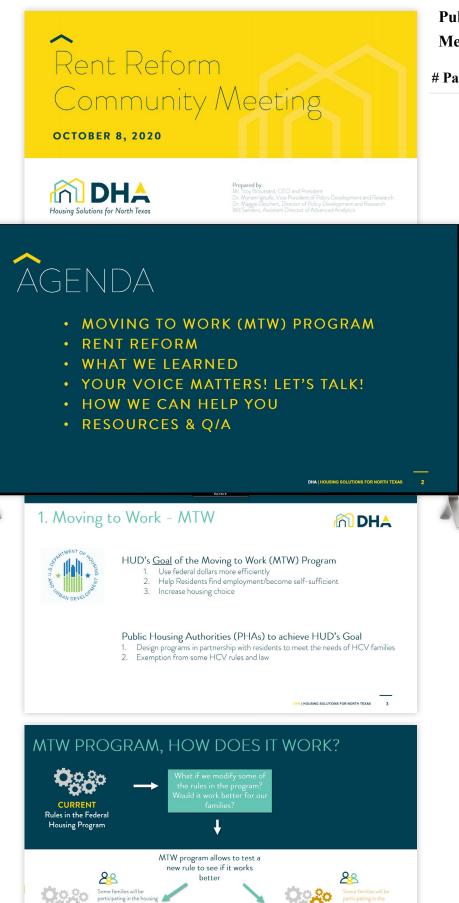
3939 North Hampton Rd Dallas, TX 75212 214 951 8300 7-1-1 for Relay Texas Assistance

DHA is a Fair Housing and Equal Opportunity Agency





Evidence that two resident meetings were held;



NEW RULE

## Public Hearing and Board Meeting Participation

rticipants	Date	Meeting	
221	Oct 8	MTW Rent Reform Community Meeting #1	
19	Oct 22	MTW Resident Advisory Board Meeting	
41	Oct 29	MTW Rent Reform Community Meeting #2	
192	Dec 7	MTW Rent Reform Community Meeting #3	
260	Dec 15	MTW Rent Reform Community Meeting #4	

#### 733 total participants

# a. DHA's engagement with public housing residents and HCV participants in the MTW Plan and application process

DHA acknowledges that in the affordable housing industry, significant barriers to meaningful resident engagement exist which greatly undermine program implementation, outcomes, and authenticity. Mindful of these challenges, which are further exacerbated by the COVID-19 pandemic, DHA has designed and implemented thoughtful public engagement strategies to meaningfully engage its residents and community partners.

### I. WEBINARS

DHA leveraged both traditional and non-traditional tools to increase access and opportunities to engage. We conducted five virtual community meetings to introduce the MTW program and to gather feedback from residents. DHA is sensible to the idea that the MTW program may present a certain level of complexity, especially for residents long accustomed to participating under the Brooke amendment rule. Thus, the MTW program and proposed policy were introduced incrementally, and in a non-technical way, over the course of four community meeting webinars to avoid overwhelming and alienating residents from meaningful engagement. Similarly, we purposefully departed from the conventional one-way presentation approach where the presenter monopolizes the virtual stage. Instead, all of our webinars were coupled with live, interactive polling/surveys throughout the presentation, building a shared space for meaningful exchange, dialogues, and participation.

To expand engagement opportunities, and moving beyond the two-meeting statutory requirement, DHA was mindful to schedule several community meeting webinars (5) after work hours, on different days of the week, to accommodate residents' varying availability. We also leveraged our CRM technology to disseminate webinar notices using targeted email campaigns and SMS messaging with multiple automatic reminders set for days before, the day of, an hour prior, and at time of the virtual meeting. Because of these efforts over 700 residents attended our 4 webinars and close to 5,000 people responded to our policy feedback surveys.

First, our team designed a short introductory survey to inform residents about DHA's intention to participate in the MTW program and to gauge attitudes with respect to the current rent formula; then followed our first MTW webinar. Our approach for our webinars was to (i) present the MTW program, (ii) share previous survey results, and (iii) launch a live polling. Intentionally, and to demonstrate to our residents that their voice matters and to encourage further engagement, we consistently offered a glance at past survey results, and how what we have learned ties to our proposed MTW plan.

#### WEBINAR 1 and 2 (October 8, 2020 and October 29, 2020):

**i. "MTW Program: How it works":** First, we presented the three statutory goals of the MTW program. We then explained that the MTW program allows testing a new rule to see if it allows achieving these goals. To do so, we explained that DHA families are randomly assigned to a first group where families continue to participate in the housing program under the current rules, and another group participating under the MTW rule, and that we then

assess how these groups differ (non-technical way to introduce the experimental research design).

**ii. "What We Learned":** We then shared early survey results with our residents, identifying dominant trends, and discussing how the MTW program could enable DHA to address residents' concerns. This section allows residents to feel their voice heard, and to understand how the MTW program relates to them.

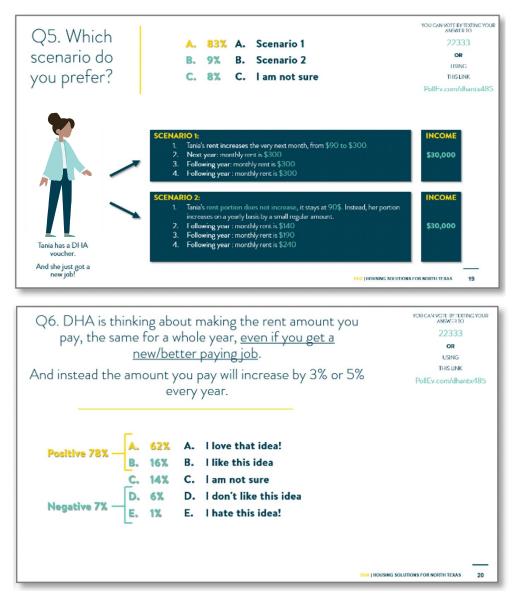
**iii. "Your Voice Matters!"** Based on the first survey results, our team then sought to better understand how DHA families define self-sufficiency, how they envision DHA's role in assisting them achieving it, and how our proposed rent reform policy addresses these concerns. DHA launched a live polling session to gather input. To facilitate participation, DHA used a polling service that is both mobile friendly, where attendees can text their answer, and that can be accessed using a short web link, with no registration required (pollev. com/dhantx485).

a. To break the ice, and on a lighter note, our team was mindful to first introduce trial questions to allow attendees to get set up, and to rehearse answering fun poll questions! We were happy to find that, despite a difficult season, North Texas remains the land of the Cowboys!





b. To facilitate our families' understanding of the MTW proposed policy, our team first introduced it in a non-technical way (illustratively, Q.5), using comparative scenarios, and using one consistent character (Tania) throughout all public engagement exercises. The presenter walked through the scenarios, and provided clarification based on questions received from the audience. In addition, to gauge consistency in responses (as a proxy for understanding, and to inform subsequent presentation material), our team also asked the same question but in a different way (descriptively, Q6).



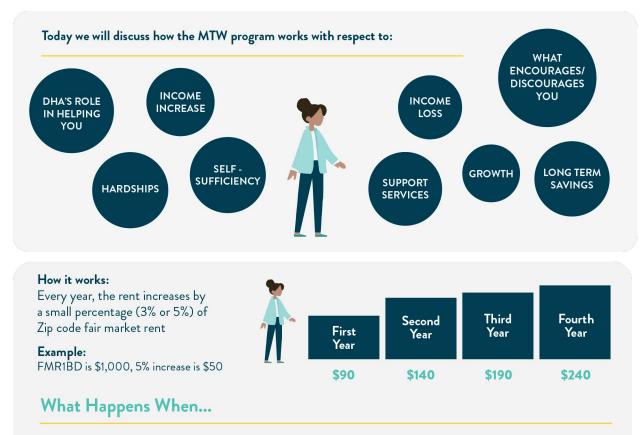
**iv. "Resources & Q/A":** Finally, our closing sections for our webinars aimed at sharing MTW resource links (i.e. our MTW webpage and HUD website) as well as opening the floor for additional comments and/or questions that families may want to ask. It is important to note that questions were answered throughout the presentation, and all questions have been also transcribed and answered in writing, posted on our website, and shared via email campaign as well.

MOVING TO WORK NORTH TEXAS

#### WEBINAR 3 and 4 (December 7, 2020 and December 15, 2020):

Our third and fourth webinar similarly included section (i) MTW Program: How it works, and section (ii) What We Learned, which provided a summary of residents' feedback on the previous poll exercises and surveys.

Distinctively, webinars 3 and 4 sought to gauge whether work (dis)incentives comparatively exist under current rent formula and proposed MTW rent policy. These webinars also sought to dive into key scenarios/mechanisms under the proposed rent reform to both further inform our families about the specificities of the program and to get feedback about it. The intent was to ensure that families were fully informed, beyond the mere knowledge that the MTW policy is a steppedrent policy. Rather, families were able to reflect and engage about critical processes and rules that apply when a tenant's income increases, decreases, is stagnant, or what kind of hardship policies will be in place.





#### Tania's income increases?

Tania gets to save her extra income - her rent does not go up until the following year.



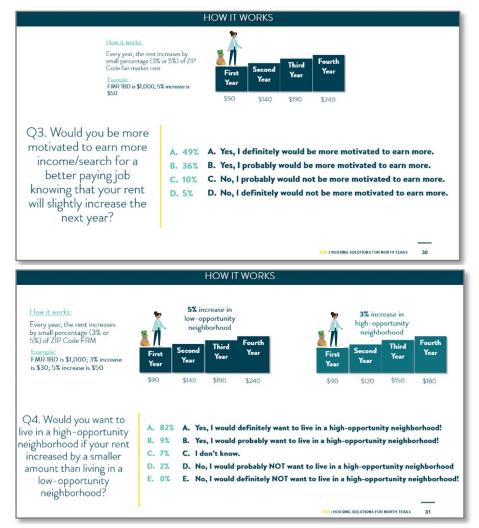
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#### Landlord increases rent?

It does not impact Tania's rent. Indeed, her rent portion is based on ZIP Code FMR. The ZIP Code FMR stays the same for 5 years.

#### Tania's income decreases?

Tania's rent portion stays the same, unless she qualifies for hardship. If she qualifies, her rent will be reset at the step closest to 30% of her income.



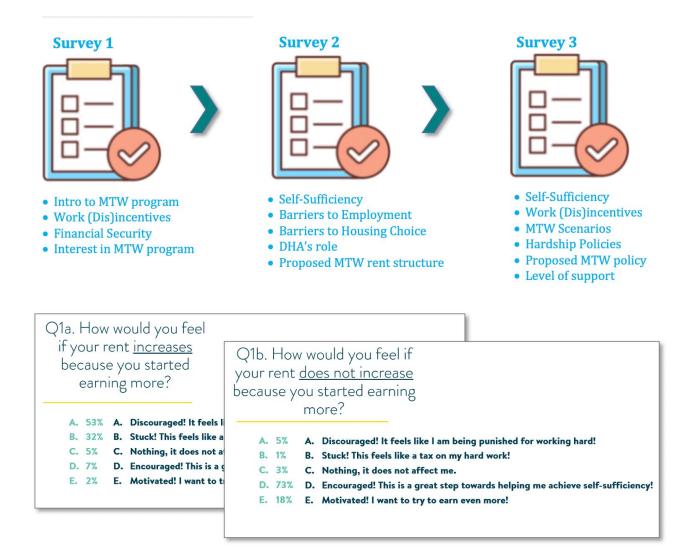
WEBINAR 5 – DHA Resident Advisory Board Meeting (October 22, 2020):

DHA also engaged and consulted its RAB about its proposed MTW policy. Similarly, RAB board members were introduced to the statutory objectives of the program, the use of control/treatment groups, the proposed MTW rent policy, its structure and incentives, hardship policies as well as the early community feedback results received at that time.

#### II. SURVEY TOOLS

As mentioned earlier, our research team designed a series of surveys to elicit meaningful feedback from residents regarding key elements of the MTW program. Survey 1 was sent out via email and posted online. Surveys 2 and 3 were originally conducted as live, interactive surveys during our webinars and then emailed, along with the webinar presentation materials, to all families after the webinars. The surveys explored important thematics to assess the fitness of the proposed policy structure and associated incentives. Surveys sought to capture residents' attitudes and preferences regarding the current rent formula and its relation to their willingness to work and ability to achieve self-sufficiency. Similarly, respondents were asked the same questions regarding the proposed MTW policy. DHA's research team was mindful to keep the questions simple, and to frame comparative questions in a non-bias way, offering the same set of answers for both the current and MTW proposed policies.



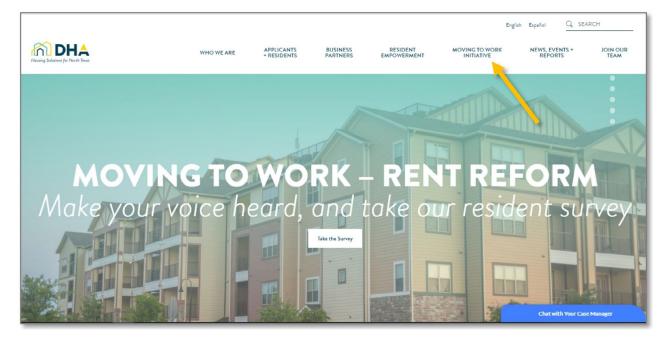


#### III. FOSTERING ACCESSIBILITY

DHA also ensured that all residents and the community at-large were given opportunities to meaningfully participate. To facilitate and encourage participation, we used a wide variety of engagement tools and platforms to gather feedback on a continuous basis.

- 1. First, DHA leveraged its CRM system to launch email and SMS campaigns to disseminate MTW information and webinar opportunities during which families voted/completed live surveys. Flyers were also distributed at DHA properties and Headquarters.
- 2. To foster access, DHA ensured that survey instruments were mobile-friendly, easy to use, and did not require registration.
- 3. MTW webinars were scheduled at various times of the day and week to accommodate as many residents as possible and provide multiple opportunities for residents to participate.
- 4. Links to the surveys, presentations, and MTW material were also sent via email after all webinars to allow DHA families unable to attend virtual meetings to access presentation material and provide feedback by completing the surveys on their own time.

- 5. To further expand opportunities for participation, our team translated key presentations and surveys into Spanish to enable individuals with Limited English Proficiency (LEP) to also access information and voice their opinion.
- 6. DHA conducted four MTW webinars, a RAB webinar, one public hearing, a webinar for its MTW Advisory Committee, and a DHA Board meeting.
- 7. DHA created a webpage dedicated to the MTW program (https://dhantx.com/moving-to-work/) where MTW material, presentations, surveys, and comments are made available. To ensure great visibility and facilitate access, an MTW menu item was added to DHA's main webpage, as well as a direct link to our survey. This enabled us to collect feedback from not only DHA-assisted families, but also the community at-large.
- 8. DHA received over 170 comments via its polling/Q/A sessions throughout its webinars and via email.
- 9. DHA assembled a MTW Advisory Board made up of key private and public sector partners and clients to review and support DHA's MTW program implementation.



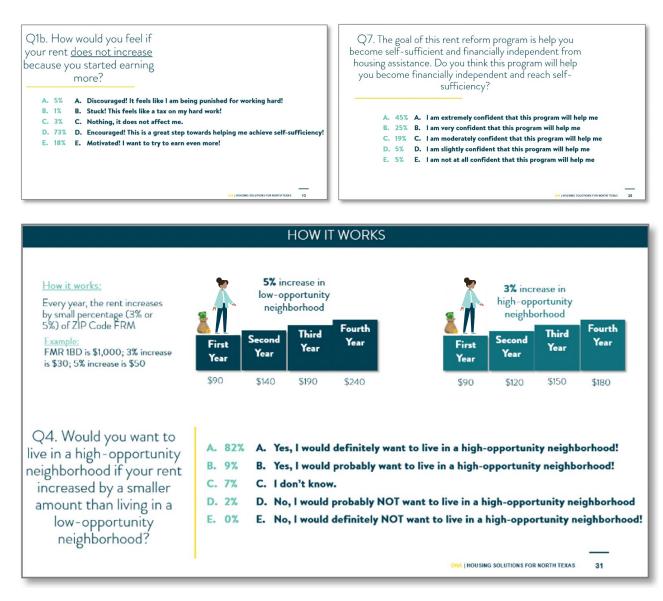
#### IV. TRANSPARENCY

DHA is committed to the pursuit of an inclusive and transparent public engagement process. All public engagement opportunities were affirmatively marketed to DHA-assisted families and the overall community. DHA's research team carefully drafted a series of engagement tools and presentations to ensure that all critical aspects of the proposed policy and MTW program were effectively and objectively presented to residents and the public. All comments and questions received have been answered individually, and have been aggregated, summarized by topic, and shared with the residents and the public (via email and website).

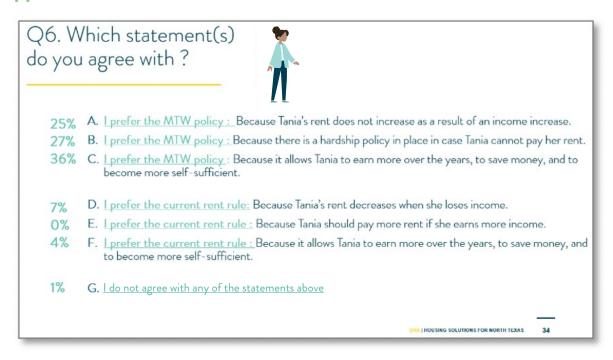


#### V. OVERVIEW OF SURVEY FINDINGS

Our extensive outreach efforts have been incredibly successful, with close to 5,000 total survey responses and over 700 webinar attendees. Results show that 91% of DHA families expressed that they would feel "motivated" and "encouraged" to continue of their path towards self-sufficiency if their rent did not increase as a results of employment gain/growth. They also shared that they would definitely (89%) and probably (9%) want to live in the higher-opportunity areas if their rent increases at a smaller rate compared to a lower-opportunity neighborhood. Similarly, 88% of respondents expressed that they prefer the MTW proposed rent because rent does not increase because of an income increase, because there are hardship policies in place, and because overall they believe that the MTW policy would enable them to earn more over time, to save money, and to become more self-sufficient. In sum, 70% of respondents stated being extremely/ very confident that DHA's proposed MTW program would help them become self-sufficient and financially independent.

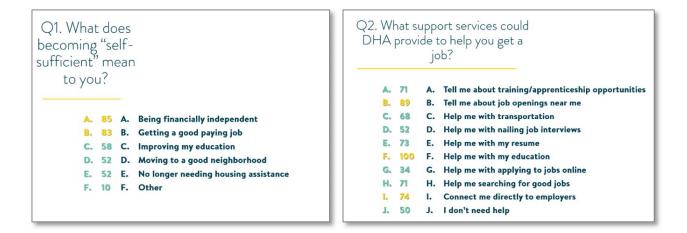






# b. DHA considered feedback received from the public in the MTW Plan and application process. The PHA communicated the goals of rent reform and responded effectively to any concerns; and

DHA intentionally designed step by step engagement tools to inform the development of the plan. First, via our multiple survey tools, the public was able to voice how they feel about the current rent structure and how they envision DHA's role in assisting families in them achieving self-sufficiency going forward. More specifically, respondents have shared how they would like DHA to a) assist them with securing employment opportunities, b) the kind of support services they would need to increase their housing choice and access to opportunities, and c) how DHA policies can help them achieve financial independence from housing assistance. The feedback received will directly inform DHA's proposed programmatic and operational strategies for rent reform and supportive case management to meet all the expressed needs of its families to help them achieve self-sufficiency under the MTW program.

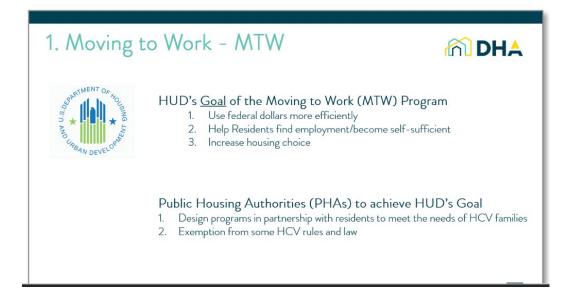




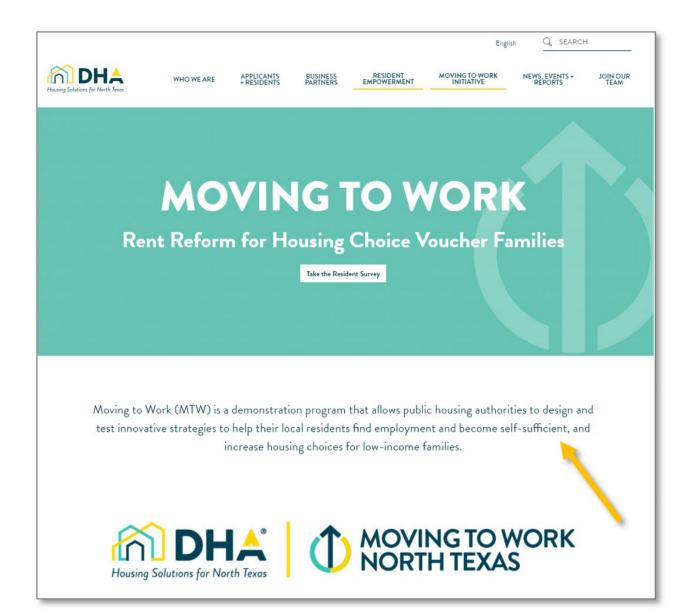
Second, throughout our community engagement process, DHA also received comments that informed the development of the proposed hardship policies. Families and the general public inquired about whether the transition from the current policy to the MTW proposed policy could result in an increase in rent portion. To mitigate this, DHA created an onboarding hardship policy for households for whom the initial onboarding into the MTW program results in a sizeable increase in rent portion. The on-boarding hardship policy will allow qualified households to temporarily maintain their current rent payment, which is their rent payment before the institution of the MTW rent reform formula. Thus, DHA created four hardship policies to protect residents and provide them with temporary rent relief. Similarly, based on comments received, DHA is working on developing operational processes and policies to protect clients against eviction during hardship review/evaluation. In addition, based on comments received from the Plaintiff's Attorneys involved in the Walker Consent Decree, DHA is considering excluding HCV families with a Walker litigation voucher.

Finally, DHA gave full consideration to all comments received. Indeed, we transcribed all comments received throughout the public engagement process and provided an answer for each of them individually (+170). In addition, and to facilitate the public's understanding, DHA then built an FAQ-like document by compiling all comments by theme, and accordingly offered a summary response. These documents have been shared via email campaigns and posted on DHA's MTW webpage.

DHA effectively communicated the goals of rent reform to its residents and the public at-large. As mentioned in the preceding section, all virtual meetings started with a section providing an overview of the MTW program that explicitly covers the three statutory goals of the MTW program. Similarly, our MTW website's main page starts by setting forth the goals of the rent reform.









#### **Community Questions and Answers**

#### **STAFF/CASEWORKERS – 3 QUESTIONS**

**Q:** How will the role and assignments of caseworkers change under the MTW program? **A:** Implementing the proposed MTW program will streamline operations and provide the opportunity for staff to engage the client in discussion, planning and counseling regarding economic self-sufficiency instead of performing administrative tasks.

#### **SUPPORT SERVICES -18 QUESTIONS**

**Q:** How will DHA assist me throughout the program? What kind of support services will be provided to assist with self-sufficiency?

A: DHA will leverage its longstanding diverse community partners in the fields of education, workforce, family services, health and wellness, sports, and business to support DHA families' journey toward self-sufficiency. Resources include, but are not limited to, (i) employment, training, and education-related services, (ii) financial literacy counseling, (iii) resources for landlord recruiting and mobility counseling services to increase housing choice

**Q:** Is the MTW program different from the FSS program?

A: Yes, the MTW program is different from the FSS program. Please note that the FSS is also intended to assist families towards self-sufficiency. Please visit our webpage here to learn more about the FSS program.

#### **INCOME / PAYMENT – 48 QUESTIONS**

Q: How does an increase/decrease in income impact rent payment?

A: A tenant's rent portion is based on ZIP code FMR and not on his/her income. Therefore, if a tenant increases or decreases his/her income, this does not affect his/her rent portion. The tenant will continue to make payments according to his/her schedule, unless the tenant requests and qualifies for hardship. DHA staff will work on assisting families to overcome hardships and barriers to under-/unemployment.

Q: Are clients required to report a change in income? Is there an income cap to the program? A: Income reexaminations would occur every three years. If a household's income at reexamination is high enough to affordably rent a unit at the FMR, they will no longer be eligible for assistance. That is, if a household's monthly income times 30% is greater than the FMR for their household/unit size, they would be required to exit assistance.

**Q:** What would be the starting rent when the program starts?

A: The first year, families will have their income certified and will be placed on their ZIP code payment schedule step the closest to, not to exceed, 30% of their income.



#### LANDLOLRD INCREASE RENT- 2 QUESTIONS

**Q:** What if the landlord raises rent?

A: A tenant's rent portion is based on ZIP code FMR and not on his/her income, nor rent. Therefore, if a landlord increases rent (and it does not exceed payment standard, and passes reasonableness test), this does not affect the tenant's rent.

#### **INTENT / ADDITIONAL FUNDING? -1 QUESTION**

Q: Does the MTW program provide more federal dollars for DHA?A: No additional federal dollars will come to DHA with the MTW program.

#### **HOMEOWNERSHIP -9 QUESTIONS**

Q: Can a tenant still pursue homeownership?

A: One of key goals of the MTW program is for participants to achieve economic selfsufficiency. Working towards self-sufficiency can ultimately assist families to become ready for homeownership.

**Q:** Does DHA have a program/class to help or assist in buying a first home? **A:** Yes. DHA administers the HCV Homeownership program, and provides classes to assist families reach ownerships.

#### **ELIGIBILITY – 26 QUESTIONS**

**Q:** Who is eligible for this program? How does one qualify?

A: Eligible households include currently assisted and newly admitted HCV households. Elderly and disabled households, families in the Family Self-Sufficiency program, and Public Housing residents, Walker Settlement Vouchers will be excluded.

**Q:** Are there any credit and/or employment requirements to qualify for the MTW program? **A:** No. Households are not required to meet credit or employment requirements to participate in the MTW program.

#### WALKER PROGRAM -12 QUESTIONS

**Q:** Will Walker voucher holders be able to participate in the MTW program? **A:** No, these households are excluded from the program.

#### **PROGRAM PARAMETERS (PARTICIPATION) -20 QUESTIONS**

**Q:** When is the program scheduled to start and how are individuals selected? **A:** If selected, DHA is scheduled to start the implementation by spring 2022. Individuals will be randomly selected to participate in the program under either the proposed MTW rent policy, or the current one.



Q: How many families will be selected? Is opting out an option?A: HUD, in collaboration with DHA will determine a suitable number of families to participate. DHA anticipates at least 4,000 families to participate. Opting out is not an option for this program.

#### LOCATION/RELOCATION/HOAs -12 QUESTIONS

**Q:** Are families able to relocate?

A: Yes, families are able to relocate within DHA's seven-county jurisdiction. However, families are not required to move.

**Q:** What is a high-opportunity neighborhood?

A: While it varies, in general, higher-opportunity neighborhoods have a relatively low poverty rate, access to good schools, affordable transportation options, and close to employment opportunities.

#### **HARDSHIP -9 QUESTIONS**

**Q:** Can hardship be denied?

A: It is anticipated that clients who do not meet the criteria under the hardship policies will be denied. While subject to refinement, it is anticipated that the hardship policy can be requested by households experiencing a loss of income due to extraordinary circumstances (such as national and/or state declared natural disaster, health related, death, out of the household's control resulting in extraordinary financial distress and the household's inability to pay rent accordingly to their rent schedule.

#### **OTHERS" -14**

#### COMMENTS FROM THE PUBLIC.

- POSITIVE: -20 COMMENTS i.e. If this rule [rent formula] was changed 15 years ago I would be self-sufficient.
- NEUTRAL 6 COMMENTS

i.e. Please consider individuals currently in college as we too are working to increase income and obtain self-sufficiency. I'd love to see MTW offered to those us that are Walker recipients as we are already in inclusive communities.

• NEGATIVE: - 4 COMMENTS + 1 LETTER

i.e. I don't like the idea of my rent being raised every year now that my rent is more than \$1,000 a month. That means my rent would go up but my income will be staying the same. It makes sense for some but not for others.



#### The public notice advertising the public hearing



#### NOTICE OF VIRTUAL/TELEPHONIC PUBLIC HEARING

A public hearing regarding DHA *Housing Solutions for North Texas' ("DHA")* 2021 Moving To Work (MTW) Cohort #2 Rent Reform grant application to the U.S. Department Housing and Urban Development (HUD) is scheduled for Monday, **November 23, 2020 at 12:00 noon.** Due to social distancing practices currently in effect, the Public Hearing will be **virtual, telephonic, and accessible online or by phone.** The DHA Board will vote on the final MTW Cohort #2 Rent Reform grant application submittal to HUD at DHA's Board of Commissioners Meeting on December 16, 2020.

To Join the MTW Cohort #2 Rent Reform Public Hearing schedule for noon on November 23, 2020 follow the steps below:

- Online click on the following link https://dhantx.zoom.us/j/95221096047 Meeting ID: 952 2109 6047; (use the "raise hand" feature for permission to speak)
- by Phone (346) 248-7799, or toll free (888) 788-0099 and then enter Meeting ID: 952 2109 6047# (use \*9 for permission to speak)

The purpose of the MTW Cohort #2 Rent Reform public hearing is to provide an opportunity for DHA residents and the public to express their comments regarding the draft MTW Plan prior to submission of the Grant Application to HUD.

A draft copy of the MTW Grant Application is available for the public to review on DHA's website, <u>https://dhantx.com/moving-to-work/</u> or may be requested via email to Dr.Myriam.lgoufe@dhantx.com. Due to the current pandemic, DHA's offices are closed to the public, however, once the offices are reopened, the MTW Plan will be available for review at DHA Services HQ, located at 3939 N. Hampton Road, Dallas, Texas 75212 during office hours.

DHA also seeks written comments regarding the MTW Cohort #2 Rent Reform grant application. Written comments must be received by December 10, 2020 and may be sent to the following address:

DHA Housing Solutions for North Texas Research Development and Policy Department 3939 N. Hampton Road Dallas, Texas 75212

#### Or by Email to Dr.Myriam.lgoufe@dhantx.com

DHA Housing Solutions for North Texas will provide services or devices that allow persons with sensory, manual, and speaking disabilities to have an equal opportunity to participate in its programs or activities. If such services or devices are needed, DHA must be notified within 5 working days prior to the particular meeting, program or activity, so that provisions can be made. For assistance please call (214) 951-8348, TTY 1-800-735-2989 or 504ADA@dhadal.com.

DHA *Housing Solutions for North Texas* will not discriminate on the basis of race, color, national origin, religion, sex, disability, familial status, age, sexual orientation, gender identity, or marital status. Equal Housing Opportunity.



#### The public notice advertising the public hearing

AFFIDAVIT OF PUBLICATION

STATE OF TEXAS

COUNTY OF DALLAS

Before me, a Notary Public in and for Dallas County, this day personally appeared Mert Tezkol, advertising Representative for The Dallas Morning News, being duly sworn by oath, states the attached advertisement of

DALLAS HOUSING AUTHORITY AD# 1779051 was published in The Dallas Morning News

DATE PUBLISHED November 1, 2020 November 8, 2020 November 15, 2020 November 22, 2020

# Marketplace



MOVING TO WORK NORTH TEXAS

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Mert Tezkol

Wert Tezkor

November 23, 2020 Coulene Mathie (Notary Public)



# **Market**place



D9 11-01-2020 Set: 17:48:43 Sent by: ocoronado@dallasnews.com BusineBLAGK D9 11-08-2020 Set: 17:24:55 Sent by: ocoronado@dallasnews.com BusineBLACK

83

The public notice advertising the public hearing



MOVING TO WORK NORTH TEXAS

D9 11-22-2020 Set: 17:54:18 Sent by: ocoronado@dallasnews.com BusineBLACK

#### The public notice advertising the public hearing

AFFIDAVIT OF PUBLICATION

THE STATE OF TEXAS

COUNTY OF DALLAS

Before ME, the undersigned authority, on this day personally appeared the person whose name is subscribed below, who being by me first duly sworn, upon oath deposed and said:

That this affiant is a duly authorized officer or employee of The DALLAS EXAMINER which is a newspaper of general circulation in Dallas, Texas and published in DALLAS COUNTY, Texas.

The attached states that the advertisement (Notice of Virtual / Telephonic Public Hearing) placed by Dallas Housing Authority 11-5-20 in The Dallas Examiner newspaper.

Authorized Officer or Employee

SWORN TO AND SUBSRIBED BEFORE ME, this the 5th day of Nov ember, 2021.

Tebastina Plomas

Notary Public, State of Texas

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and	****	2





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#### The public notice advertising the public hearing

El Hispano News 2102 Empire Central, Dallas, TX 75235 (214) 357-2186 FAX (214) 357-2195

#### STATE OF TEXAS COUNTY OF DALLAS

Maria Gallegos am authorized by the publisher as agent to make this affidavit of publication. Under oath, I state that the following is true and correct.

The notice will be/has been published in <u>www.elhispanonews.com</u> according to the requirements by Dallas Housing Authority.

DATE OF PUBLICATION:

November 5th, 2020

TYPE OF CORPORATION:

**Dallas Housing Authority** 

TYPE/ REFERENCE OF DOCUMENT:

"Notice of Virtual/Telephonic public hearing" Spanish version

AUTHORIZED SIGNITURE:

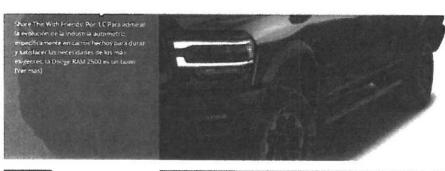
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NOTARY SIGNATURE AND SEAL:





#### The public notice advertising the public hearing



LO MAS DESTACADO

¡La RAM 2500, le da todo lo

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que usted quiere en una camioneta, y más!

MI MORIAS

Memorias de un cubano

sin importancia

**CUBANO** 

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La RAM 2500, le da todo lo que usted quiere en una camioneta, y más

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Cherry Bolt EV Premier i ha llegado para quedarse ¿estamos preparados para recibirlo?

2021 Nia Seltos SX Turbo, Tiene 3 B (Bueno, Bomito y Barato)

ALFA Romeo Steivio TI, 2020, Sinónimo de lujo y celidad

El Hispano News publica el libro "Historia de un Cupano Sin Importancia "

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Memorias de un cubano sin importancia

Granada en milmemoría: un episodio de crueídad



¡La RAM 2500, le da todo lo que ustad quiere en una camioneta. y más!



DODGE Charger R/T SCAT Pack Plus, 2020. Un Auto Súper Atrevido



Cadillac X16 2020 empeñado en ser un auto de lujo



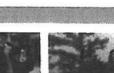
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Cadillac XT6 2020

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Trasiadan a Texas a niños

migrantes por la noche

# Octubre, mes de la Salud

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**DODGE Charger R/T SCAT** 

Pack Plus, 2020. Un Auto Súper Atrevido

Danza moderna en el ATT

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#### The public notice advertising the public hearing



#### NOTICE OF VIRTUAL/TELEPHONIC PUBLIC HEARING

A public hearing regarding DHA *Housing Solutions for North Texas' ("DHA")* 2021 Public Housing Agency (PHA) Plan and 2021-2025 Capital Fund Program (CFP) Five-Year Plan, is scheduled for Wednesday, **December 16, 2020 at 12:00 noon.** Due to social distancing practices currently in effect, the Public Hearing will be **virtual, telephonic, and accessible online or by phone.** The Public Hearing will be held at the beginning of the DHA's Board of Commissioners Meeting on December 16, 2020.

#### To Join the Meeting:

- Online click on the following link <u>https://dhantx.zoom.us/j/92458131911</u> Meeting ID: 924 5813 1911; <u>(use the "raise hand" feature for permission to speak)</u>
- by Phone (346) 248-7799, or toll free (888) 788-0099 and then enter Meeting ID: 924 5813 1911# (use \*9 for permission to speak)

The purpose of the public hearing to provide an opportunity for DHA residents and the public to express their comments regarding the draft Plans prior to submission of the Plans to the U.S. Department of Housing and Urban Development (HUD).

Draft copies of the Plans are available for review on DHA's website, <u>www.dhantx.com</u> or may be requested via email to <u>debbie.quitugua@dhantx.com</u>. Due to the current pandemic, DHA's offices are closed to the public, however, once the offices are reopened, copies of the Plans will be available for review at DHA Services HQ, located at 3939 N. Hampton Road, Dallas, Texas 75212 during office hours.

DHA also seeks written comments regarding the Draft Plans. Written comments must be received by December 10, 2020 and may be sent to the following address:

DHA Housing Solutions for North Texas Capital Programs Department 3939 N. Hampton Road Dallas, Texas 75212

#### Or by Email to debbie.quitugua@dhantx.com

DHA Housing Solutions for North Texas will provide services or devices that allow persons with sensory, manual, and speaking disabilities to have an equal opportunity to participate in its programs or activities. If such services or devices are needed, DHA must be notified within 5 working days prior to the particular meeting, program or activity, so that provisions can be made. For assistance please call (214) 951-8348, TTY 1-800-735-2989 or 504ADA@dhadal.com.

DHA Housing Solutions for North Texas will not discriminate on the basis of race, color, national origin, religion, sex, disability, familial status, age, sexual orientation, gender identity, or marital status. Equal Housing Opportunity.



#### The public notice advertising the public hearing

AFFIDAVIT OF PUBLICATION

STATE OF TEXAS

COUNTY OF DALLAS

Before me, a Notary Public in and for Dallas County, this day personally appeared Mert Tezkol, advertising Representative for The Dallas Morning News, being duly sworn by oath, states the attached advertisement of

**DALLAS HOUSING AUTHORITY AD# 1778366** was published in The Dallas Morning News

DATE PUBLISHED October 25, 2020 November 1, 2020

Sell the Toff your back. cals. 214.745.8123

Buy and

Mert Tezkol

November 2, 2020

Carlene Mathie

(Notary Public)



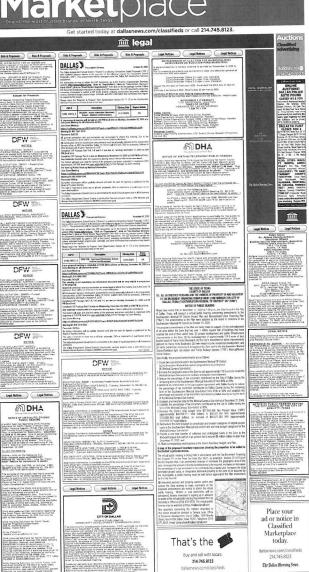
The Dallas Morning News dallaspews.com			Sunday, October 25, 2020 91	2	
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D9 10-25-2020 Set: 18:02:49 Sent by: ocoronado@dallasne



D9 11-01-2020 Set: 17:48:43 Sent by: ocoronado@d-llar

#### The public notice advertising the public hearing



D9 11-01-2020 Set: 17:48:43 Sent by: ocoronado@dallasnews.com BusineBLACK



#### The public notice advertising the public hearing

AFFIDAVIT OF PUBLICATION

THE STATE OF TEXAS

COUNTY OF DALLAS

Before ME, the undersigned authority, on this day personally appeared the person whose name is subscribed below, who being by me first duly sworn, upon oath deposed and said:

That this affiant is a duly authorized officer or employee of The DALLAS EXAMINER which is a newspaper of general circulation in Dallas, Texas and published in DALLAS COUNTY, Texas.

The attached states that the advertisement ( Notice of Public Hearing ) placed by Dallas Housing Authority 10-29-20 in The Dallas Examiner newspaper.



J. BE

Authorized Officer or Employee

SWORN TO AND SUBSRIBED BEFORE ME, this the 28th day of October, 2020. y personally appeared the person duly sworn, upon oath deposed and

Notary Public, State of Texas



#### The public notice advertising the public hearing

El Hispano News 2102 Empire Central, Dallas, TX 75235 (214) 357-2186 FAX (214) 357-2195

#### STATE OF TEXAS COUNTY OF DALLAS

I Maria Gallegos am authorized by the publisher as agent to make this affidavit of publication. Under oath, I state that the following is true and correct.

The notice will be/has been published in <u>www.elhispanonews.com</u> according to the requirements by Dallas Housing Authority.

DATE OF PUBLICATION:

October 29th, 2020

TYPE OF CORPORATION:

**Dallas Housing Authority** 

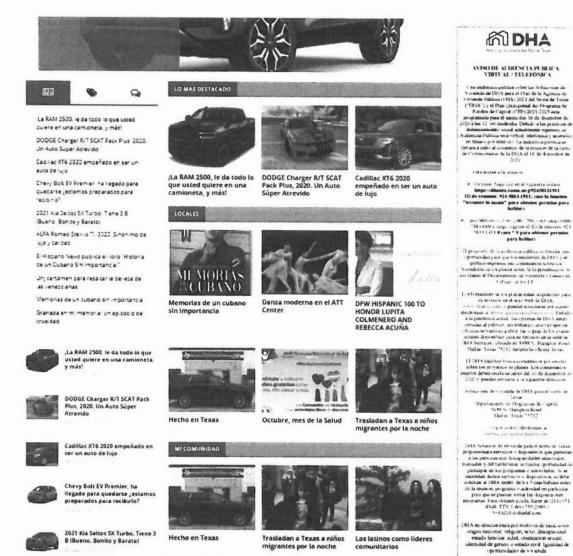
TYPE/ REFERENCE OF DOCUMENT:

"Notice of Virtual/Telephonic public hearing" Spanish version

AUTHORIZED SIGNITURE:

Jana hallys Account executive: SUBSCRIBED AND SWORN TO BEFORE ME ON THE 29 DAY OF October , 2020. NOTARY SIGNATURE AND SEAL:

#### The public notice advertising the public hearing





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#### Evidence that the public hearing was held (items could include minutes, sign-in sheet, etc.)

Exhibit A



#### Subject: Moving To Work Public Hearing Meeting Minutes

#### Date: November 23, 2020

DHA, Housing Solutions for North Texas conducted a public hearing on November 23, 2020. The subject of the public hearing was the Moving To Work Demonstration program, DHA's MTW program plan and Application. The public hearing was conducted virtually using Zoom and was widely advertised in advance of the public hearing. MTW Public Hearing notices were directed to DHA public housing residents and Housing Voucher program participants and to the general public. Notices were sent to DHA clients by email, notices were posted at DHA public housing property management offices, and paid advertisements were placed in the public notice section of the Dallas Morning News. Additionally, DHA posted notices on its Web site identified herein as Exhibit A.

The public hearing began promptly at 12:00 noon on November 23, 2020. David Zappasodi, Senior VP and COO opened the meeting by welcoming all visitors to the public hearing and provided an overview of the Moving to Work program and DHA's interest in becoming a MTW agency. Dr. Myriam Igoufe was introduced who provided a presentation including the following agenda items:

- DHA Operational Shift
- MTW overview
- Proposed MTW policy structure
- DHA's role in the MTW program
- Moving Forward next steps

A copy of the public hearing presentation is included as Exhibit B. Following the presentation Mr. Zappasodi opened the floor to receiving public comments and questions.

Questions and comments received during the public hearing are included as Exhibit C.

Following the receipt of questions from guests, Mr. Zappasodi called for any visitors who may wish to provide additional comments or questions. Hearing none, the meeting was adjourned at 12:43 pm



#### Evidence that the public hearing was held (items could include minutes, sign-in sheet, etc.)

Exhibit A



#### NOTICE OF VIRTUAL/TELEPHONIC PUBLIC HEARING

A public hearing regarding DHA *Housing Solutions for North Texas' ("DHA")* 2021 Moving To Work (MTW) Cohort #2 Rent Reform grant application to the U.S. Department Housing and Urban Development (HUD) is scheduled for Monday, **November 23, 2020 at 12:00 noon.** Due to social distancing practices currently in effect, the Public Hearing will be **virtual, telephonic, and accessible online or by phone.** The DHA Board will vote on the final MTW Cohort #2 Rent Reform grant application submittal to HUD at DHA's Board of Commissioners Meeting on December 16, 2020.

To Join the MTW Cohort #2 Rent Reform Public Hearing schedule for noon on November 23, 2020 follow the steps below:

- Online click on the following link https://dhantx.zoom.us/j/95221096047 Meeting ID: 952 2109 6047; (use the "raise hand" feature for permission to speak)
- by Phone (346) 248-7799, or toll free (888) 788-0099 and then enter Meeting ID: 952 2109 6047# (use \*9 for permission to speak)

The purpose of the MTW Cohort #2 Rent Reform public hearing is to provide an opportunity for DHA residents and the public to express their comments regarding the draft MTW Plan prior to submission of the Grant Application to HUD.

A draft copy of the MTW Grant Application is available for the public to review on DHA's website, <u>https://dhantx.com/moving-to-work/</u> or may be requested via email to Dr.Myriam.lgoufe@dhantx.com. Due to the current pandemic, DHA's offices are closed to the public, however, once the offices are reopened, the MTW Plan will be available for review at DHA Services HQ, located at 3939 N. Hampton Road, Dallas, Texas 75212 during office hours.



#### Evidence that the public hearing was held (items could include minutes, sign-in sheet, etc.)

Exhibit B



#### Evidence that the public hearing was held (items could include minutes, sign-in sheet, etc.)

Exhibit C

#### MOVING TO WORK DEMONSTRATION PROGRAM - Public Hearing

#### Questions & Comments

- 1. The 2017 ad hoc report of MTW centers around the budget policy priority referenced and reported about. It said that there really wasn't much extra choice in housing options found in the MTW jurisdictions that participate in this program. I am not seeing how your plan helps people expand housing options and choices. Particularly since the housing crisis [rents in] opportunity areas grossly outpace income. With the STEP program I am not seeing the expectation that income will increase as the same rate as market actually increases, that 3% or what have you. Also, I am not quite sure that I can catch a hold of these hardship descriptions that you mentioned without knowing how your defining extraordinary circumstances. And my other thing is, with the zero income hardship and the onboarding hardship, what happens after three months? Can the hardship be renewed for an additional three months?
- 2. Are you able to speak more on how this will benefit residents in high opportunity areas when their rents go up faster?
- 3. Will individuals with disability or elderly individuals be eligible for MTW Program?
- 4. If we look at the financial assistance through COVID for renters who have been experiencing hardship and problems, they exempt voucher holders out of that. I believe the voucher holders are exempt out of that because the expectation is, when their income decreases that their tenant portion decreases. This is a total departure from what the normal process is within the voucher program. Even with other agency believe what is going on with the voucher program. Voucher holders really have been saved during COVID because of the current traditional structure and I am just super concern about rents going up when income may be going down. The details on the hardship, those are extremely important to understand because I think the devils are in the details.
- 5. Are you considering changes to HCV on your MTW? Will you consider perhaps allowing longer search time for families that are looking for housing? Right now it's pretty rigid with 90 days and will you also considering exercising the option for higher payment standards? I think both of these options may already be available to you on the regular program but I just thought I throw it out there to you anyways.

END



#### A resolution signed by the Board of Commissioners

#### **RESOLUTION NO. 5063**

#### RESOLUTION TO APPROVE DHA'S MOVING TO WORK PLAN AND TO SUBMIT AN APPLICATION PACKAGE TO HUD

- WHEREAS, it is the mission of DHA, Housing Solutions for North Texas, to provide affordable quality housing and access to supportive resources across North Texas; and
- WHEREAS, the U.S. Department of Housing and Urban Development (HUD) issued a public notice regarding the expansion of its Moving To Work Program; and
- WHEREAS, the Moving To Work program offers public housing agencies the opportunity to design and test innovative, locally-designed housing and self-sufficiency strategies; and
- WHEREAS, through this public notice, HUD invited public housing agencies to declare their interest in participating in the Moving To Work Program Expansion by submitting a letter of interest; and
- WHEREAS, with the full support and encouragement of the Board of Commissioners, DHA submitted an letter of interest to HUD declaring DHA's enthusiastic interest in participating in the HUD Moving To Work Program Expansion, Cohort #2, Rent Reform; and
- WHEREAS, following a review of many letters of interest from public housing agencies, HUD notified DHA that it favorably reviewed the DHA submission and identified DHA as a public housing authority qualified to submit a formal application to participate in the Moving To Work Program Expansion; and
- WHEREAS, in collaboration with DHA's public housing residents and housing voucher participants as well as representatives from community organizations and from the academic community, DHA developed its Moving To Work Plan; and
- WHEREAS, DHA has met the public process requirements described in Section 4(C)(i)(c) of Notice PIH-2020-21 including notifying both public housing and HCV participants of its intention to participate in the MTW Demonstration Program; holding at least two resident/participant meetings (separate from and before the required public hearing);





#### A resolution signed by the Board of Commissioners

publishing a notice that a public hearing will be held on the MTW Plan and application package; posting the draft MTW Plan and application package (in the format described in the notice) and all relevant information for public inspection at least 30 days before submission of the MTW Plan and application package to HUD; and holding a public hearing to discuss the MTW Plan and application package and inviting public comment.

DHA has conducted briefings, polled DHA client opinions through various surveys, and engaged DHA clients, members of community organizations and members of the academic community in meaningful discussions, and DHA has refined and modified its Moving To Work Plan accordingly. DHA has accumulated broad support from DHA clients and the community to move forward to submit its Moving To Work Application package and the public process requirements described in Section 4©(i)© have been met; and

- WHEREAS, DHA operates one of largest Housing Choice Voucher programs in the country with an annual Housing Assistance Payment budget authority of more than \$182M serving approximately 39,200 individuals 44% of whom are under the age of 18; and
- WHEREAS, DHA operates one of most complex HCV programs successfully implementing HUD's demonstration program known as Small Area Fair Market Rents since the inception of this HUD initiative in 2010, with more than 570 zip code based payment standards; and
- WHEREAS, DHA has a 50 square mile regional jurisdictional operational area that spreads across seven (7) counties, including: Collin, Dallas, Denton, Ellis, Kaufman, Rockwall, and Tarrant; and
- WHEREAS, with this extensive experience and talent rich staff, we believe DHA is uniquely qualified to participate in the Moving To Work Rent Reform Cohort #2, in the alternative rent policy.

#### NOW THEREFORE BE IT RESOLVED,

That the DHA Board of Commissioners hereby approves DHA's desire to obtain the U.S. Department of Housing and Urban Development's MTW designation under the second cohort of the MTW expansion, and authorizes the DHA President and CEO to take all necessary and appropriate action to submit a competitive application to accomplish this purpose.





#### A resolution signed by the Board of Commissioners

#### FURTHER be it resolved that,

The DHA Board of Commissioners hereby adopts the application, including the MTW Plan and the Certifications contained therein, and confirms that DHA has selected alternative MTW Test Rent #3 as described in DHA's application and in Notice PIH-2020-21.

FURTHER be it resolved that,

The Chairman of the DHA Board of Commissioners is authorized to execute the "Certifications of Compliance with HUD and Federal Requirements and Regulations: Board Resolution to Accompany Application to the Moving to Work Demonstration Program" attached hereto and made a part of this Resolution, as required for submission of an MTW application.

PASSED UNANIMOUSLY, 5\_ IN FAVOR AND D AGAINST, this 16th day of December, 2020.

Jorge Baldor, Board Chair

ATTEST:

Troy Broussard, President, CEO & Secretary





#### A resolution signed by the Board of Commissioners

#### **CERTIFICATE OF RECORDING OFFICER**

The undersigned, being the recorder and custodian of the Minutes of the governing body of DHA Housing Solutions for North Texas, certifies that on Wednesday, December 16, 2020 at a validly convened Special meeting of the Board of Commissioners of said Authority at which a quorum was present and voting, the attached Resolution No. 5063 entitled "A Resolution Approve DHA's Moving to Work Plan and to Submit an Application Package to HUD" was introduced, read and duly adopted.

IN WITNESS WHEREOF my hand and seal of the Authority, this 16<sup>th</sup> day December 2020.

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Troy Broussard, Secretary The Housing Authority of the City of Dallas, Texas – DHA Housing Solutions for North Texas



## Appendix 3: Required Standard Forms

#### Certification of Consistency with the Consolidated Plan

OMB Approval No. 2506-0112 (Exp. 6/30/2017)

## Certification of Consistency with the Consolidated Plan

U.S. Department of Housing and Urban Development

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

Applicant Name:	DHA Housing Solutions for North Texas			
Project Name:	Moving to Work North Texas			
Location of the Project:	DHA's 7 County Housing Choice Voucher Operations Area - Dallas,			
	Tarrant, Collin, Denton, Rockwall, Ellis, and Rockwall Counties			
Name of the Federal Program to which the applicant is applying:	Moving to Work Program			
Name of Certifying Jurisdiction:	City of Dallas			
Certifying Official of the Jurisdiction Name:	Dr. Eric Johnson			
Title:	Chief of Economic Development & Neighborhood Services			
Signature:	Cani A. Johner			
Date:	12/22/20			

Page 1 of 1

#### **Certification of Payments**

## Certification of Payments to Influence Federal Transactions

OMB Approval No. 2577-0157 (Exp. 03/31/2020)

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

Applicant Name

DHA, Housing Solutions for North Texas

Program/Activity Receiving Federal Grant Funding

Moving to Work Expansion Program - Cohort #2

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

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

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions. (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

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

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

Name of Authorized Official	Title
Troy Broussard	President & CEO
Signature	Date (mm/dd/yyyy)
	01/05/2021
40	

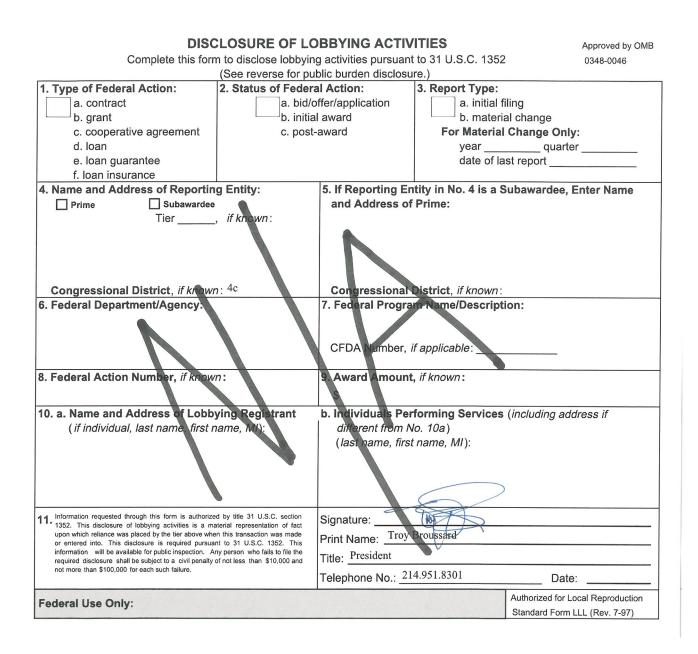
Previous edition is obsolete

form HUD 50071 (01/14) ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3



## Appendix 3: Required Standard Forms

#### **Disclosure of Lobbying Activities**





#### **LEADERSHIP TEAM BIOs**

#### Troy Broussard

President and Chief Executive Officer

Mr. Broussard started his career in affordable housing at DHA in 1993 in the Intake Department and has served the community through DHA ever since. He is passionate about the agency's work to provide affordable housing solutions and cultivating economic advancement opportunities for its clients.

Prior to becoming CEO in 2015, Troy was the senior vice president and chief operating officer. In this role, he led the agency's initiative to secure major capital investments for the redevelopment of the agency's aging public housing inventory. Through this campaign, DHA was awarded four U.S. Department of Housing and Urban Development – HOPE VI grants totaling \$100 million producing 3,300 new rental and homeownership affordable units in North Texas. These investments have been a catalyst for change, transforming entire neighborhoods.

Troy also directs the agency's education programs. He is a firm believer in education as a catalyst in helping people break the cycle of poverty. He was part of the leadership team when DHA formed the Opportunity Rising Foundation, an education-focused non-profit created by DHA to provide scholarships to graduating high school seniors and DHA adult residents. The foundation has provided scholarships to more than 1,000 students totaling more than \$1.4 million in non-federal funds.

Troy serves as a member of the Opportunity Dallas Policy Task Force, the Child Poverty Action Lab CEO group, and is also a board member for the American Cancer Society's CEOs Against Cancer group.

#### **David Zappasodi**

Senior Vice President and Chief Operating Officer

David joined DHA in 2016 as senior vice president and chief operating officer. Prior to that, he has served at six Public Housing Agencies (PHAs) over the past 40 years. Most recently, David was the executive director of the Arlington Housing Authority while concurrently serving as the executive director of the Arlington Finance Corporation and the assistant director of the City of Arlington's Community Development and Planning Department from 2005 to 2016. Mr. Zappasodi has served in leadership roles at housing agencies in Houston, Texas and Baltimore, Maryland.

His current responsibilities include the delivery of safe, decent affordable housing and related services to eligible families across North Texas. David is committed to aiding the CEO to comprehensively transform DHA into a sustainably great organization. He is proud of the momentum DHA has gained in streamlining its operations, training and equipping its workforce, improving accessibility, creating opportunities for clients to attain economic self-sufficiency, and improving the agency's overall efficiency and effectiveness.

Throughout his career, Mr. Zappasodi has actively participated in the National Association of Housing and Redevelopment Officials (NAHRO) and was inducted as a Fellow in 2010 in recognition of his contributions to the industry and is the recipient of the Southwest Regions prestigious Charles L. Farris award in 2012 and was inducted into the Texas Hall of Fame in 2013.

#### **Dr. Myriam Igoufe**

Vice President of Policy Development & Research

Dr. Myriam Igoufe is the vice president of Policy Development & Research for DHA. Dr. Igoufe leads DHA's research initiatives, and the development and implementation of operational strategies to remove barriers to self-sufficiency and foster upward- mobility for communities chronically under-resourced in North Texas. She is responsible to perform research related to patterns of segregation, poverty, access to transportation and opportunities, and to operationalize responses to address these issues. Dr. Igoufe leads the design and development of innovative technological infrastructure to support policy and operational advancement for DHA.

Dr. Igoufe led the country's largest collaborative group to develop the North Texas Fair Housing Assessment (22 local governments, PHAs, and County), which was part a new planning process established by the U.S. Department of Housing and Urban Development (HUD) requiring federal grantees to identify, evaluate, and address fair housing issues and factors contributing to discriminatory issues. In 2020, Dr. Igoufe and her team secured a multi-year applied research partnership with Harvard University's research group 'Opportunity Insights' led by renowned economist Dr. Chetty. Recently, Dr. Igoufe and her team also were selected to participate in a nationwide initiative to advance diversity, equity & inclusion in education ('The Bridges Collaborative'), led by The Century Foundation. Her work has received coverage from the Texas Tribune, NPR, CBS, the Wall Street Journal, the Dallas Business Journal, and others.

Dr. Igoufe also serves on the City of Dallas Undesign the Redline Advisory Board, the MDHA Racial Equity Committee, Commit's Strategic Planning External Steering Committee, and has been named to the Advisory Council of the Dallas Economic Opportunity Leadership Academy.

After attending the Sorbonne Law School in Paris, she received her bachelor's degree in political science, government and international law as well as her master's degree in public administration from Lamar University. Igoufe earned a PhD in urban planning and public policy from the University of Texas at Arlington.

#### Dr. Maggie Deichert

Director of Policy Development & Research

Dr. Maggie Deichert is the director of Policy Development & Research for DHA. In her position, Dr. Deichert creates clear and concise reports that assess the contributing factors and effects of poverty and inequality in North Texas. Dr. Deichert also contributes towards DHA's goal



to provide affordable quality housing and promote self-sufficiency through researching and analyzing current conditions of communities in poverty and developing strategies to combat these conditions through innovative, targeted support and technological efficiency.

Dr. Deichert is a Vanderbilt University doctoral graduate in political science with a focus in American political behavior and statistical methodology. Dr. Deichert brings expertise in research design, survey design and implementation, and advanced statistical analysis using both quantitative and qualitative methods as a means of implementing change in communities. Her research has been published in Journal of Politics and Flaunt Magazine. Her past experiences researching and analyzing the attitudes, behaviors, and characteristics of different populations enables DHA to gather original data from residents and evaluate data to help all North Texas communities.

Dr. Deichert has been helped PD&R acquire a multi-year research partnership with Harvard University's research group, Opportunity Insights, as well as be selected as a participant for the Century Foundation's "Bridges Collaborative." She also co-led the development and implementation of innovative model of COVID funding distribution recently featured in the Wall Street Journal."

After graduating from the Hofstra University Honors College with a degree in political science, Dr. Deichert attended the Pennsylvania State University School of International Affairs and received an M.I.A. in international affairs. Dr. Deichert then attended Vanderbilt University where she obtained a Ph.D. in political science.

#### Will Sanders

Assistant Director of Advanced Analytics

Mr. Sanders is responsible for providing technical and analytical support, expertise and insights that help inform data and AI-driven operational enhancements and strategic solutions for DHA. He assists in researching and analyzing patterns of poverty, segregation, spatial disparities, transportation accessibility and neighborhood quality in North Texas communities.

His work for DHA includes development of strategic technological solutions to support innovative policies and programs to address identified inequities. Will assists in the design and development of software and AI-based initiatives and has in-depth experience developing data science workflows and building scalable machine learning systems.

Will sees his work as bridging the gap for those who are systemically disadvantaged. He uses data and technology to bridge this gap in three ways: by improving operational efficiency and capacity so that DHA can better serve residents, by improving data accessibility so that DHA can make better decisions, and by developing publicly available, web and app-based resources so that DHA directly increases opportunity for those living in North Texas.

Will is working toward his doctorate in Civil Engineering from the University of Texas at Arlington, with a specialization in Artificial Intelligence and Predictive Modeling.



His past professional experiences include lead graduate engineer analyst for the North Texas Regional Housing Assessment (NTRHA), where he implemented technical solutions that saved the organization tens of thousands of hours in labor.

#### **Brooke Etie, LCSW**

Vice President of the Housing Choice Voucher Program

Brooke has served as vice president of the Housing Choice Voucher Program for DHA since 2014. Her responsibilities include guidance to department directors for their implementation of departmental plans, programs, and operations. In addition to her position with DHA, she concurrently serves on the Board of Directors for Metro Dallas Homeless Alliance. She is a licensed clinical social worker who specializes in mental health.

Prior to her role as the vice president of Voucher Programs, Brooke succeeded as DHA's policy analyst-trainer from 2009 to 2014. In this position, she monitored department policies and procedures and made recommendations for improving operations and processes for the agency and for individual departments. Brooke successfully assured that all activities followed DHA policies and applicable federal, state and local regulations.

Brooke's public housing experience extends beyond DHA. She was the occupancy technician and Information Center supervisor for the Houston Housing Authority from 2007 to 2009 before moving to Dallas. Throughout her career, Brooke has been committed to worthy causes. She served as a therapist at Millwood Hospital in Arlington, TX since 2010, has actively participated in the Dallas County Behavioral Health Housing Work Group since 2014, and is a member of the Children's Hospital Physical Environments Working Group.

Brooke's passion for giving back to the community compelled her to volunteer at The Bridge, an organization that assists homeless individuals in obtaining permanent supportive housing. Her years at The Bridge began in 2012, where she was moved by the amount of work accomplished by volunteers, and she wanted to devote her personal time to an organization that impacts so many individuals.

Brooke has a Bachelor of Arts degree in social work from Northwestern State University, a Master of Science in social work from the University of Texas at Arlington, followed by 2 years of clinical practice/supervision.

**Chetana Chaphekar, C.P.A.** *Chief Financial Officer* 

Ms. Chaphekar is the chief financial officer for DHA, a role she assumed in 2010. She is responsible for the supervision of DHA's finance, purchasing, and information technology departments. Ms. Chaphekar and her team have successfully managed the rigorous auditing process the agency is required to adhere to year after year without deficiencies or audit findings.



During her time with DHA, Ms. Chaphekar has upgraded new accounting and programmatic software, revised personnel policies, completed tax credit cost certifications, and implemented cash management processes to improve cash flow and controls. Prior to Ms. Chaphekar's tenure with DHA as the chief financial officer, she started as a controller for the Houston Housing Authority, supervising the department from 1990 to 2005. Between 2005 and 2006, Ms. Chaphekar had the opportunity to serve as the chief financial officer for the Association of the Advancement for Mexican Americans (AAMA). With AAMA, she achieved financial self-sufficiency for the agency with a turnaround of \$1 million in the financial bottom line in less than 14 months. In 2006, she returned to the Houston Housing Authority as vice president of the Office of Fiscal & Business Administration—a position in which she was responsible for the supervision of Finance, Information Technology, and Purchasing and Regulatory Compliance departments.

#### Jeni Webb

#### Director of Compliance

Jeni has served as the director of compliance for DHA since 2017. Her responsibilities include managing and directing compliance reviews, preventing fraud, and training staff.

Jeni ensures agency-wide compliance through expert supervision of operations and management. She performs audits to guarantee compliance with administrative policies, court orders, and HUD directives. In addition, Jeni conducts extensive research and analysis of federal regulations, legislation, and HUD guidelines, confirming the effectiveness of reporting systems and internal controls.

Prior to joining DHA, Jeni worked as a program analyst for the US Department of Housing and Urban Development (HUD). From 2004 until 2009, Jeni was a commissioned officer for the United States Army, before launching her career in public housing. She is an Operation Iraqi Freedom Veteran and served two combat tours—one in 2006 and another in 2008.

Jeni holds a Bachelor of Science Degree from the United States Military Academy at West Point, and she earned a Master of Science Degree from the University of Texas at Austin in 2011.

#### LaShonne Watts

#### Director of Resident Services

As the director of Resident Services for DHA, Ms. Watts is primarily responsible for planning, coordinating and implementing resident services activities to help the families attain economic self-sufficiency. Part of that role is also helping to run the agency's educational non-profit, Opportunity Rising Foundation.

Before joining DHA, she was the general manager for the Red Bird area collective impact nonprofit Neighbor Up, part of the Dallas GrowSouth initiative. In this position, she worked on community revitalization and economic development initiatives in her assigned area.



Prior to that she was an Assistant City Attorney and Southeast Community Prosecutor for the City of Dallas for almost five years where she focused on improving the quality of life for residents through strategic code enforcement. Ms. Watts also worked as a Staff Attorney for the Children's Law Center in New York City for five years, where she represented children in custody, visitation, guardianship, paternity and abuse and neglect cases in Bronx Family Court. Ms. Watts started her legal career at the law firm of Pillsbury Winthrop as a litigation associate. She received her Bachelor of Science degree from Cornell University and her Juris Doctor degree from the University of California, Berkeley.

#### PARTNERS







Oct 29, 2020

RE: Moving to Work (MTW) Cohort 2

To whom it may concern:

As a leading provider of software solutions to the PHA and Multi-Family industries, Yardi Systems is proud to contribute to HUD's MTW Expansion Project efforts. Yardi has been successfully providing MTW agencies with alternative rent and hardship solutions for several years. Our MTW clients include many of the nation's leading PHA's including Alaska Housing Partners, Boulder Housing Partners, Home Forward, San Bernardino Housing Authority, San Diego Housing Commission and San Mateo Housing Authority.

Yardi is committed to the MTW Expansion project and have begun work to implement solutions for the Cohort 2 phase including Stepped Rents and Tiered Rents. We are working closely with Dallas Housing Authority, a Cohort 2 PHA applicant, to develop an efficient and effective tool for their team and community.

As HUD has not yet clarified specifications for Cohort 2, we are unable to provide a definitive timeline for delivery of a Cohort 2 solution, but we have begun work on those pieces where clarity exists.

If you have questions about our MTW Cohort 2 development project, please contact our Director of Client Services, Gabrielle Van Horn <u>Gabrielle.VanHorn@yardi.com</u>.

Thank you

David G. Kessler VP, Affordable and Public Housing Yardi Systems, Inc.

Yardi Systems, Inc. | 430 South Fairview Avenue | Santa Barbara CA 93117 | tel 800.866.1124 | fax 805.699.2041 | www.yardi.com

United States • Canada • Europe • Asia • Australia • Middle East



MTW Advisory Committee Partners

## Support for DHA's MTW Application and Participation on the MTW Advisory Commitee

Dallas Independent School District - DISD To who

**Dallas Regional Chamber** 

United Way Metropolitan Dallas

Child Poverty Action Lab CPAL

Apartment Association Of Greater Dallas - AAGD

City of Dallas

**Dallas County** 

University of North Texas UNT

The Real Estate Council TREC

**Dallas** College

Legal of Aide of North

Southern Methodist University - SMU

**City Square** 

Federal Reserve

North Council of Government - COG

**Big Thought** 

Paul Quin College

**Behind Every Door** 

Commit

Workforce Solutions Greater Dallas Advisory Commitee To whom it may concern, We wholeheartedly support DHA in its quest to become a Moving <u>To</u> Work (MTW) agency and a participant in HUD's MTW Rent Reform demonstration. Under the leadership of Troy Broussard, DHA has emerged as an innovative, compassionate, thought leader in our community and is doing great work not only providing affordable housing solutions, but is equally active in providing opportunities for low income persons receiving housing assistance to embark on a personal journey to attain financial independence. We believe their MTW plan approach of linking rent reform to

We applaud HUD for initiative to explore and research rent reform-in the federal housing assistance programs and we know that DHA is the best public housing agency in the nation to work with HUD to test rent reform.

housing choice is a unique opportunity to test and evaluate the impact of promoting

self-sufficiency for families participating in their programs.

We support their MTW plan and are eager to serve on the MTW Advisory Committee to help inform, frame as well as deliver direct services to DHA families.

#### Míchael Hínojosa

Michael Hinojosa President Dallas Independent School District

#### Drexell Owusu

Drexell Owusu Senior Vice President Dallas Regional

#### Alan Cohen

Chamber

Alan Cohen CEO Child Poverty Action Lab *Theresa Daniels* Dr. Theresa Daniels County Commissioner Dallas County District 1

loe May

Dr. Joe May

Chancellor

**Dallas College** 

lan Mattingly

of Greater Dallas

President

lan Mattingly

Apartment Association

#### TC Broadnax

T.C. Broadnax City Manager City of Dallas

#### Laurie Larrea

Luarie Larrea President Workforce Solutions of Greater Dallas

#### Ashley Brundage

Ashley Brundage Executive Director of Housing Stability