

**FIVE  
YEAR  
PLAN  
2021**

**Tallahassee Housing  
Authority**



**Significant Amendment  
Modification** (Attachment B.2.A.)

## **ATTACHMENT B.2**

Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

### **The Tallahassee Housing Authority's Goals and Objectives are:**

#### **A. Expand the current public housing and housing choice vouchers supply of assisted housing:**

- Leverage Replacement Housing Factor program funds with private and other public funds to create additional housing opportunities;
- Continue developing our repositioning plan for revitalizing our Public Housing stock and exploring opportunities for adding additional units to the THA's portfolio;
- Explore expanding our service area for the Housing Choice Voucher program to the greater Tallahassee area (Jefferson, Wakulla, Gadsden counties);
- Apply for funding opportunities that may become available to revitalize the current housing stock and/or create new housing;
- Seek partnerships with public and private service providers to support the development of affordable workforce housing, housing for the elderly, the homeless and permanent supportive housing for persons with special needs;
- Consider the feasibility of an application to HUD for the Rental Assistance Demonstration (RAD) program;
- Finalize and submit our demolition/disposition application for the redevelopment of Orange Avenue Apartments;
- Continue applying for funding for the redevelopment of Orange Avenue Apartments;
- Apply for a planning grant for the revitalization of Springfield Apartments;
- Work with State, County, City, and housing finance agencies to target resources towards specific housing needs;
- Participate in local community groups that focus on affordable housing and homelessness; and
- Continue to provide outreach to owners to assure diverse housing options for the HCV clients.
- THA, in discussions with our residents and our consultant, THA will continue researching the feasibility of converting public housing units to project-based vouchers; primarily our single family homes;
- THA will consider purchasing additional housing units and utilizing PBV in an effort to expand the availability of affordable units

- THA will issue a Request for Proposals (RFP) to identify suitable projects for which Project-Based Vouchers (PBV) would be awarded; as a way of expanding the supply of assisted housing units for very-low and low-income households in Tallahassee. The RFP would award proposals for new construction and/or newly rehabilitated affordable units. The RFP would be open-ended with quarterly reviews of applications received. THA plans to award approximately 200 PBVs. Lastly, the award of PBVs would leverage federal, state and local resources as a cost-effective approach to producing affordable units.

**B. Improve the quality of housing:**

- Continue to perform timely and thorough inspections of units under the Housing Choice Voucher and public housing programs;
- Continue to make repairs and improvements to Public Housing units to increase marketability and customer satisfaction;
- Complete a physical needs assessment (PNA) for all public housing units upon final guidance from HUD;
- Consider additional physical improvements that are designed to enhance security (i.e., lighting, video surveillance, resident identification cards, utilizing after hours quiet time, fencing and neighborhood involvement);
- Adopt rules to provide greater security for tenants and staff, including no trespassing 24 hours a day at some or all of THA properties;
- Review REAC Inspection indicators quarterly and focus improvements based on findings and deficiencies.

**C. Ensure equal opportunity and affirmative and further fair housing:**

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sexual orientation, age, gender identification, marital status, familiar status, and disability;
- Undertake affirmative measures to provide a suitable living environment for families living in assisted housing regardless of race, color, religion, national origin, age, sex, sexual orientation, gender identity, marital status, familial status, HIV/AIDS infection status and disability;
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities;
- Continue on-going efforts to educate and provide information to the general population and landlords;
- Conduct on-going training to educate staff; and
- Review polices to ensure compliance with HUD's equal access rules

**D. Improve the performance of the Public Housing program through PHAS scoring:**

- Improve rent collection;
- Maintain a 98% occupancy rate;
- Offer and enforce resident repayment agreements; and
- Improve on timely evictions where necessary

**E. Provide programs and activities:**

- Continue to partner with area supportive service providers, employers, educational institutions and other groups to increase economic opportunity for residents;
- Target and apply for available grants for the continued development of innovative approaches that aid residents in achieving family self-sufficiency;
- Open program waitlists as needed; and
- Identify family self-sufficiency needs and coordinate programs and activities to aid program participants in achieving self-sufficiency;

**F. Promote self-sufficiency of assisted household:**

- Increase the number and percentage of employed persons in assisted families by promoting activities such as job fairs and job training events;
- Engage supportive service providers to increase independence for the elderly or families with disabilities where needed;
- Improve Section 3 plan to expand resident employment opportunities; and
- Pursue grant opportunities to fund self-sufficiency coordinator positions through HUD grant or other available and appropriate sources.

**G. Increase Customer Satisfaction**

- Automate more functions to provide increase quality of service such as web-based applications, increase web capabilities, and interactive voice response systems; and
- Reduce face to face meetings but increase automation to improve customer satisfaction.

**H. Identify resident and staff training for overall professional development:**

- Continue to collaborate with the THA community wide partners, i.e. Workforce Plus, City of Tallahassee, Leon County Public Schools as well as area colleges and universities to provide resident and staff training for professional development;
- Continue to hire Section 3 residents and provide opportunities for local hiring for THA contractors;
- Identify resources to support resident job training programs; and
- Review the HCV administrative plan and the Admissions and Continued Occupancy Plan annually to make necessary revisions;

**I. Revise the Personnel Policy and Employee Performance Evaluation system:**

- Develop a sick leave donation policy;

- Revise THA Personnel Policies and Procedures to ensure continuous compliance with local, state, federal and HUD regulations;
- Provide supervisor and employee training on performance management policies and procedures; and
- Identify training opportunities to improve employee performance.

**J. Improve the housing delivery system through cost-effective management of federal government programs and resources:**

- Update rent collection policies and procedures;
- Develop a database system to inventory all properties and train staff in its use;
- Continue to upgrade the computer network infrastructure with faster, more reliable, connections to increase overall productivity;
- Upgrade computer servers for increased data storage and response time for users;
- Standardize all versions of software;
- Utilize video conferencing equipment to further better communications between all THA properties; and

**K. Continue to reduce resident/client file error rate among both programs:**

- Continue to enhance quality control systems for public housing and housing choice voucher programs;
- Continue using the EIV (Employment Income Verification) system -Investigate cases where suspicion of fraud exists by the participant, family members, landlords, owners, and staff;
- Continue prosecuting fraud cases when necessary and demand repayment when appropriate; and
- Continue staff training of rules and regulations and use of software and webinars.

**L. Provide a safer community for residents:**

- Continue to work with local law enforcement Security Liaison officer;
- Continue to meet with residents to obtain input on security and crime concerns;
- Work with residents to develop a neighborhood watch/report process that assures their safety and
- Install additional speed bumps in the public housing communities.

Expand the current 543 public housing and 2300+ housing choice vouchers supply of assisted housing:

- THA has applied for and received additional Mainstream and VASH vouchers.
- THA will also be requesting Tenant Protection Vouchers for Orange Avenue residents in addition to our application for demolition, disposition and will always do so as part of any redevelopment of our public housing stock;
- In consultation with residents and community stakeholders, THA completed a master plan for the redevelopment of Orange Avenue Apartments; which (when completed) will increase the number of affordable housing units on the property;
- Applied for and received funding from the state, city and county for Phase 1 of the redevelopment of Orange Avenue. We applied for additional funding from the state but did not get a lottery number within funding range. THA will reapply this each year as funding is made available so that we can complete all of the redevelopment phases;
- Continued to seek partnerships with public and private service providers to support the development of low-income housing for the elderly and homeless populations; as well as permanent supportive housing for those individuals with special needs;
- Considering the feasibility of an application to HUD for the Rental Assistance Demonstration (RAD) program for a phase of the Orange Avenue redevelopment or that of another site;
- Continued to work with State and County housing finance agencies, and the City, to target resources towards specific housing needs; and
- Continued to participate in local community groups that focus on affordable housing and homelessness.

Improve the quality of housing:

- Continued to perform timely and thorough inspection of units under the Housing Choice Voucher program;
- Conducted assessment of unit conditions and upgraded kitchens and flooring where appropriate;
- Upgraded the electrical grid at Springfield apartments in partnership with the City of Tallahassee;
- Continued to improve Public Housing unit's marketability and customer satisfaction;

- Reviewed REAC Inspection indicators quarterly;
- In partnership with the City, to replace the (THA-owned) electrical grid at Springfield Apartments. The improvements include replacement and increase in the number light poles (with multiple LED lights per pole) and moving the primary power lines underground;
- Improve the performance of the Public Housing program through PHAS scoring;
- Continued maintaining a 98% occupancy rate;
- Adopted rules to provide greater security for tenants and staff, including the posting of “No Trespassing” 24 hours a day signs at all of THA properties;
- Consider additional physical improvements that are designed to enhance security (i.e., video surveillance, residence identification cards, utilizing after hours quiet time, fencing and neighborhood involvement)

Provide programs and activities:

- Targeted and applied for available grants for development of innovative approaches that aid residents in achieving family self-sufficiency;
- Resident program coordinators assisted with locating community service opportunities and partnerships with service providers; and
- Identified family self-sufficiency needs and subsequently coordinating programs and activities to aid residents in achieving self-sufficiency.

Identify resident and staff training for overall professional development:

- Continued collaborating with the THA community wide partners, i.e., Workforce Plus, Tallahassee Community College, Star Metro and Leon County Schools to provide resident and staff training for professional development; and
- Continued to hire Section 3 residents and provide opportunities for local hiring for THA contracts.

Continue to reduce resident/client file error rate among both programs:

- Continued quality control system for public housing and housing choice voucher program
- Continued using the EIV (Employment Income Verification) system  
-Investigate cases where suspicion of fraud exists by the participant, family members, landlords, owners, and staff
- It is anticipated that the elimination of permissive deductions will also reduce income calculation errors in public housing files

- THA conduct utility allowance reviews to assure that all our program participants are receiving the accurate amount toward their monthly rent calculation.

Provide a safer community for residents:

- Partnered with the Tallahassee Police Department (TPD) to identify locations where TPD will install security cameras at the Orange Avenue and Springfield sites;
- Continued to work with local law enforcement Security Liaison officer;
- Implemented an anonymous tip box for residents to submit information concerning illegal activity;
- Installed additional lighting at Orange Avenue and Springfield apartments.
- Fencing will continue to be replaced and installed at the public housing sites to secure the perimeter of our property.
- THA will also continue working to mitigate soil erosion issues at all of our properties.



## **ATTACHMENT B.4**

All THA program participants are provided with information advising them of their tenancy rights, responsibilities and protections under the Violence Against Women Act (VAWA). The policy is incorporated in THA's Admissions and Continued Occupancy Plan and the HCV Administrative Plan as well.

## **ATTACHMENT B.5**

**Substantial Deviation.** Pursuant to the Agency Plan Rule requirement in 24CFR 903.7 that agency plans contain a locally derived definition of “substantial deviation” and “significant amendment or Modification.” The Tallahassee Housing Authority’s locally derived definition is as follows: “Substantial deviations or significant amendments or modifications are defined as discretionary changes that affect the mission statement, which will modify the goals and objectives of the housing authority and which require formal approval of the Board of Commissioners.”

**Significant Amendment/Modification.** Pursuant to the Agency Plan Rule requirement in 24CFR 903.7 that agency plans contain a locally derived definition of “substantial deviation” and “significant amendment or Modification.” The Tallahassee Housing Authority’s locally derived definition is as follows: “Substantial deviations or significant amendments or modifications are defined as discretionary changes that affect the mission statement, which will modify the goals and objectives of the housing authority and which require formal approval of the Board of Commissioners.”

## **ATTACHMENT B.6**

### **Resident Advisory Board (RAB) and Public Comments**

*The following were questions (and comments) were made at the public meetings:*

**Question:** How often does the inspector come to inspect my unit (HCV Homeownership)?

**Response:** The units are inspected no later than every two years. The inspector will conduct a special inspection if you request it.

**Question:** Are there enough units in Leon County to accommodate residents being relocated from Orange Avenue?

**Response:** With the construction of all the new student housing and with the increase in online classes, a lot of the units in residential neighborhoods that students used to rent are available again for families to rent. Even student-oriented housing is now available. We've received a number of calls from landlords asking how they can get tenants for their units. We've had an increase in GoSection8 listings.

**Question:** So are they limited to looking on GoSection8?

**Response:** No, participants, can use a number of real estate sites, the local newspaper, or call numbers on 'for rent' yard signs. Where they find a landlord is up to them. Go Section 8 is just a resource link on our website.

**Question:** Are there places they can afford to rent?

**Response:** There are affordable places to rent in the area. The voucher provides rental assistance above what the household can afford to pay up to the payment standard for their voucher size. The subsidy is provided to assure that families aren't cost-burdened when paying for their housing.

**Question:** For those people looking, are there landlords who say no to Section 8 (vouchers)?

**Response:** I have heard from participants that a landlord didn't want to accept the voucher toward their rent. Then again, I've had to explain the program to some landlords so they understand how it works and that the housing authority would make them whole, in the sense that they would receive their rent each month as long as the participant occupied the unit and remained eligible for the program.

**Question:** What's the public housing wait list? How long does it take for people to get housed once they're on the list?

**Response:** The housing authority provides housing assistance from our program wait lists. We don't accept walk in applications at our sites. The public housing waitlist is by bedroom size, because that's how people are housed – by the bedroom sized unit that they need for their family. Right now it takes 3-5 years for someone to get housed from the waitlist; because our occupancy rate is high and people seldom move out. It's been especially slow since COVID. What's moved the list is that we give applicants two opportunities to respond before purging them from our waitlist.

**Question:** What about the Section 8 waitlist?

**Response:** The Section 8 waitlist was opened in December 2020 for the entire month. Applications were accepted online by our software provider, duplicates were eliminated, and then they randomly selected 3,000 applications to make up our waitlist. We are still working with the last few applicants from the 2017 waitlist, so the new list is 3,000 additional applicants.

**Question:** So if there are 3,000 people on the new waitlist, does that mean you need 3,000 units to house them?

**Response:** Not necessarily. Because the applications are accepted online, they come from people all over the country. Most of them provide an address where they currently live, so it's safe to assume that all applicants are not necessarily homeless. They just want rental assistance through the program.

**Question:** As long as a tenant has a repayment agreement for unpaid rent (public housing) can they renegotiate that if they go to Section 8?

**Response:** Once a repayment plan is agreed upon, if they leave public housing, they cannot receive a voucher unless they are paying as agreed. The time to renegotiate would be before they leave public housing. As part of their admission to the housing voucher program, they sign a certification regarding any debts owed to public housing. If they default on the agreement and the debt gets entered into the HUD system not only will they not be able to participate in the voucher program, but they will have to resolve the debt before being allowed to receive assistance at another public housing authority or with HUD financed privately owned properties.

**Question:** If residents who are relocated and want to move back to the new property, will you pay moving expenses for them to come back?

**Response:** No we will only pay moving expenses for them to relocate from the property being redeveloped.

**Question:** If they still have a repayment agreement for back rent, can they return to the new property?

**Response:** As long as they are paying as agreed and are not in default.

## Additional Comments /Recommendations from Legal Services:

**Comment:** Legal Services suggests that amendments be made to the Five-Year Plan for 2021 to include detailed plans for the Orange Avenue Apartments Redevelopment as well as tenant protections that have been promised. This should include specific details on relocation plans, budget, demolition timelines, what resources will be available to tenants, what rights tenants have, what protections have been promised and any other pertinent information. Tenants must also be informed of changes in plans, such as the change from demolition in phases to all tenants needing to be relocated at once, eliminating the phases. A copy of this plan should also be provided to each tenant. This is to ensure that each tenant is fully informed about the situation at hand, plans for the future, and what their rights are.

**Response:** The housing authority agrees that our tenants should be well informed as to the redevelopment plans, how they are affected, given an updated timeline, informed of their rights and all resources the housing authority will make available to them. The housing authority has had a number of small group meetings were held with residents at the sight to provide them with a status report on the authority's progress of our application to HUD for demolition/disposition of the property, our funding applications to the Florida Housing Finance Agency, closing on the existing funding for Phase 1 (130 units), what resources the authority would provide to them and to answer any questions that they might have. While a lot of the information is posted on our website, they received an informational handout and we provided them with an email address, as well as the executive director's and property manager's contact information, should they have additional questions at any time after the meetings. We agree that residents should be kept informed and we will update our website to reflect our updated timeline. The capital fund budget for Orange Avenue is included in the Five-Year Plan. We do not believe that these details should be included in the Five-Year Plan, but rather should be incorporated as part of the Relocation Plan.

**Comment:** Rental Payments and Repayment Plans – The main resource projected to be provided to tenants for relocation is vouchers. Ending a tenant's participation in the public housing program may require that tenants either be up to date on their rental payments or current on a repayment plan (although it is important to note that for the Rental Assistance Demonstration program, HUD prohibits PHAs from entering debt into the Earned Income Verification System (EIV) "Debts Owed" module purely as a result of the 50058 End of Participation that is required to be submitted PIC as part of the conversion. See RAD Notice REV-4 Section 1.13.B.3). Legal Services requests that before providing tenants who are allegedly behind on their rent with a repayment plan so that they can be relocated, a list be provided with proof that they are behind in what amount. Tenants should have an opportunity

to contest the rent that is due and the burden is on the housing authority to provide evidence of debts owed. Steps should also be taken to provide any available emergency funding to these tenants to bring them current on their rent.

**Response:** All tenants are provided with a statement of their account each month that rent is unpaid. Repayment agreements are voluntary on the part of our tenants. If the tenant does not agree with the amount of the repayment agreement and cannot satisfactorily rectify any discrepancies with their manager, they have the right to request a hearing. HUD doesn't provide 'emergency funding' to provide monies for tenants to bring their rent to the housing authority current. The housing authority has been working with our residents to get them to apply and to provide the documentation they need to be eligible to receive monies through the Leon Cares program; to catch up any unpaid rent. Additionally, if a tenant has a loss of income, they need only complete a request for an interim certification to have their rent reduced. [Note: The redevelopment will not be completed as part of the Rental Assistance Demonstration (RAD) program.]

**Comment:** Second, Legal Services highly suggests that tenants be given a promise in writing, such as a provision in the repayment plan, that they will not be defaulted during the COVID-19 pandemic so long as they are making a good faith effort to make payments on their repayment plans. A large percentage of current tenants are claimed to be behind on their rent, which creates an obstacle to successful relocation, should they need to switch into Section 8 housing. THA maintains roughly a two-percent vacancy rate in public housing, so most will be required to relocate into Section 8 housing because there will not be enough public housing available. If they fall behind on payments, they risk losing their voucher assistance.

**Response:** In according with the current HUD COVID-19 directives, the housing authority has not defaulted any tenant on their repayment agreement and sought eviction as a remedy to the default. Section 8 program participants also may have repayment agreements with the housing authority for various reasons. Consequently, public housing residents with repayment agreements will carryover those agreements to the housing voucher program. Residents who fall behind on their payments can still remain on the program. The housing authority will review their current repayment agreement to assure that it addresses issues of their ability to repay; so that the residents are not permanently displaced.

**Comment: Relocation** – Under 42 U.S.C. §1437p (4) and 24 C.F.R. §970.21(a), the housing authority has a statutory obligation to find comparable housing that meets housing standards and has similar accommodations for tenants when displacing them due to demolition or disposition. The housing authority claims that there is sufficient Section 8 housing for tenants to be relocated to and that many tenants wish to leave Tallahassee. Legal Services requests that documentation be provided with the current needs of each tenant. This should include

family size and respective unit size needs and any tenants that need accessibility features and what those are. Legal Services also requests that documentation be provided of where each tenant will go. This should include a survey of where tenants desire to be relocated to, whether inside or outside of Tallahassee, and what specific housing the housing authority intends for residents to be relocated to. This should also be mindful of the size and accessibility requirements of each tenant. This is necessary because there is less Section 8 housing than tenants being displaced currently advertised online and even fewer that are comparable to their current home. It is also important that size and accessibility requirements are met. To comply with statutory obligations, replacement housing must be comparable, so it is necessary to have documentation that such housing is available.

**Response:** The housing authority is not seeking demolition of the units unnecessarily. The units were built about 50 years ago and the cost of renovation to meet today's standards are estimated to be about 76% of the cost of new construction. The goal is to provide residents with an opportunity to choose housing that meets their current needs in unit size, accommodation(s), amenities, school zones, neighborhoods and housing types that are better than their current units. The housing authority plans to hire relocation staff to assist tenants in finding units that meet their needs. Tenants are not limited to their source for rental housing. They can locate suitable properties using Realtor.com, Trulia, the local newspaper, GoSection8.com, floridahousingsearch.org, or finding a 'For Rent' sign in a neighborhood. Realtor.com listed over 500 properties for rent.

The relocation staff will be responsible for meeting with individual households to access their housing plan and provide them with assistance – searching for units, making appointments to see units, providing transportation to see units, negotiating with landlords and compiling household data (preferences, household members, unit size, etc.). When the requested information is compiled, we will provide it to Legal Services.

**Comment:** If there is not enough Section 8 housing currently available to standard, the housing authority should reach out to landlords with comparable housing vacancies in areas of opportunity to secure housing for current tenants. This may require providing incentives to landlords with housing vacancies that are comparable to the current Orange Avenue Apartments, such as ensuring they have fair access to insurance. It should also be ensured that landlords are aware of the benefits of providing Section 8 housing.

**Response:** The housing authority believes there is sufficient available rental housing in the Tallahassee market. However, we will conduct landlord outreach to encourage more landlord participation and explain the benefit of their participation in the Section 8 program. The housing authority cannot provide landlords with fair access to insurance.

**Comment:** Tenant Communication and Education – For RAD conversions, under Section 6.6 of HUD Notice PIH 2016-17, housing authorities are required to provide notices to tenants regarding relocation. HUD encourages housing authorities to maintain frequent communication with tenants, including ensuring that tenants know their rights and what resources are available to them. In accordance with Section 6.7, information must also be communicated regarding any changes in relocation plans. Whether the conversion is Section 18, RAD, or a blend our requests are as follows.

**Response:** As previously mentioned, the housing authority has had numerous small group meetings with the Orange Avenue residents. We have also had meetings with them via Zoom. Information is posted on our website and informational brochures regarding the redevelopment were hand-delivered to each household and at the small group meetings. Once the Relocation Plan is finalized, it will also be posted on our website and will be provided to each household.

**Comment:** The U.S. Department of Housing and Urban Development has a statutory obligation under 42 U.S.C. §3608(e)(5) to administer the programs and activities relating to HUD in a manner affirmatively to further the policies of fair housing. The Tallahassee Housing Authority is subject to the policies of HUD. As is, many residents are at risk of termination of rental assistance and permanent displacement because of the redevelopment and required relocation. This means that they will be left with either no place to go or end up in a lower-income area with worse conditions. Pushing these residents into lower income areas goes against the obligations of the housing authority to further fair housing and enables segregation. Even if the relocation is only technically temporary because they have the right to return, it will in effect be permanent because they will be unable to afford to return as is.

**Response:** No resident will have their rental assistance terminated and permanently displaced because of redevelopment and the required relocation. If residents can transfer to other public housing units, the assistance is with the unit. Should they receive a housing voucher, the assistance is provided where they choose to live. Should they decide to return, the first two phases of redeveloped units (are all affordable housing units (per Florida Housing Finance Corporation (FHFC) requirements) and will not include market rate units. The units in the first (130) and second phase (110) will have project-based vouchers tied to the units to insure affordability for extremely-low to low-income households.

**Comment:** It has long been established that segregation is unequal and constitutes a violation of the Equal Protection Clause of the Fourteenth Amendment of the Constitution. See *Brown v. Board of Education*, 347 U.S. 483 (1954). The redevelopment intends to replace the current public housing with mixed-income housing. It reduces the amount of public housing available and tries to compensate for it by providing vouchers to current tenants, but these vouchers are



illusory if there are no protections in place to ensure that they are able to and continue to be able to use them. Without protections, the redevelopment effectively forces these tenants out of their home and into lower income areas to make room for those with higher income, which is a violation of their civil rights.

**Response:** The first two phases of the redevelopment will include a mix of affordable units of extremely-low and low-income households as required by the FHFC, which provides the primary funding source for the redevelopment. Residents who receive housing vouchers will no longer have THA as their landlord. The requirement for keeping their rental assistance with the voucher is much the same as it is for public housing. To assert that our residents would lose their rental assistance simply because the housing authority is no longer the landlord, is without merit. We have a number of former public housing residents that moved to the Section 8 program that are still receiving their rental assistance through the housing voucher. The housing authority would welcome the opportunity to work with Legal Services in conducting workshops with our residents and our housing voucher participants on landlord tenant rights. We could host both in-person and online informative sessions. The housing authority looks forward to a continued working relationship through this process.

**Attachment B.7**

**Certification by State or Local Officials**