# MTW Supplement to the Annual PHA Plan

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

### OMB No. 2577-0226 Expires: 03/31/

**Purpose.** The Moving to Work (MTW) Supplement to the Annual PHA Plan informs HUD, families served by the PHA, and members of the public, about the MTW Waivers and associated activities that the MTW agency seeks to implement in the coming Fiscal Year and updates the status of MTW activities that have been previously approved. It also provides information about Safe Harbor Waivers, Agency-Specific Waivers, compliance with MTW statutory requirements, and evaluations. The MTW Supplement does not replace the PHA Plan. MTW agencies must continue to submit the applicable PHA Plan. MTW agencies that are not required to submit annual PHA Plans under the Housing and Economic Recovery Act of 2008 (HERA) must submit the MTW Supplement annually, in addition to holding public hearings, obtaining board approval, and consulting with Resident Advisory Boards (RABs) and tenant associations, as applicable, on planned MTW activities.

**Applicability.** Form HUD-50075-MTW is to be completed annually by all MTW agencies brought onto the MTW Demonstration Program pursuant to Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute) or legacy MTW agencies<sup>2</sup> that chose to follow the requirements of the MTW Operations Notice.

**Definitions.** All terms used in this MTW Supplement are consistent with the definitions stated in the MTW Operations Notice, including:

(1)**Local, Non-Traditional Activities** (LNT) – Those MTW activities that use MTW funding flexibility outside of the Housing Choice Voucher (HCV) and public housing programs established in Sections 8 and 9 of the U.S. Housing Act of 1937.

(2)**Safe Harbors** – The additional parameters or requirements, beyond those specified in the MTW activity description itself found in the MTW Operations Notice, following each activity description, that the MTW agency must follow in implementing MTW activities.

(3)**Substantially the Same Requirement** – A statutory MTW requirement that MTW agencies must continue to assist substantially the same total number of eligible low-income families as would have been served absent the MTW demonstration.

А.	PHA Information.
A.1	PHA Name: Housing Catalyst PHA Code: CO041 MTW Supplement for PHA Fiscal Year Beginning: 01/01/2024 PHA Program Type: Housing Choice Voucher (HCV) only MTW Cohort Number: 4 MTW Supplement Submission Type: Annual Submission
В.	Narrative.
B.1	<ul> <li>MTW Supplement Narrative.</li> <li>The narrative provides the MTW agency with an opportunity to explain to the public, including the families that it serves, its MTW plans for the fiscal year and its short and long-term goals.</li> <li>The MTW agency should provide a description of how it seeks to further the three MTW statutory objectives during the coming Fiscal Year. Those three MTW statutory objectives are: (1) to reduce cost and achieve greater cost effectiveness in federal expenditures; (2) to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment.</li> </ul>

### **B.** Narrative

Housing Catalyst is the Public Housing Authority for the City of Fort Collins, Colorado. We are a mission-driven real estate developer and the largest property management company in northern Colorado. Housing Catalyst provides sustainable, long-term housing solutions, serving more than 1,500 families per year. Employing innovative programs and resident support systems, Housing Catalyst offers critical tools and resources that families need while creating vibrant, sustainable communities throughout Fort Collins.

Housing Catalyst's vision for its participation in the MTW program integrates our mission and objectives with the federal statutory objectives of the MTW program to increase cost-effectiveness, self-sufficiency, and housing choice.

Housing Catalyst is only applying MTW initiatives to its HCV program in this first supplemental. The Public Housing program is in process of disposition through the RAD and Section 18 tools. By focusing on the recruitment of new landlords who are currently not participating in the HCV program, Housing Catalyst will further its mission of increasing housing choices for families through policies which encourage landlord participation and increase units available to families in the local housing market.

During its first year as an MTW agency, Housing Catalyst will focus on two initiatives: 1) Incentive payments, and 2) damage claims.

These initiatives will address **cost effectiveness** by increasing utilization rates and decreasing the amount of time voucher holders are searching for housing; **self-sufficiency** by encouraging voucher holders to seek out neighborhoods with greater opportunity and providing incentives for new landlords in those areas who were not previously working with the voucher program; and **housing choice** by increasing the pool of landlords who welcome a housing choice voucher.

Activity: C.4 Landlord Leasing Incentives; 4.b. Damage Claims		
Narrative. Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.	Description:Housing Catalyst will reimburse landlords for the cost of tenantcaused damages (minus the security deposit). The amount ofcompensation will not exceed the lesser of the cost of damagesor two months contract rent. Damages must be documented andaccepted by Housing Catalyst. Housing Catalyst will requireproof that damages are beyond ordinary wear and tear anddocumentation of the charges to the tenant's security deposit as apart of the claim process. Documentation of actual damage costsare required; Housing Catalyst will not pay based on estimates.Housing Catalyst may charge these costs to the tenant as acondition for remaining in the program. The payment will bemade to a landlord when the next HAP contract is executedbetween the owner and Housing Catalyst. Housing Catalyst hasupdated our Administrative Plan to reflect the damage claimpolicy.Agency goals for MTW Activity:Increase the number of participating landlords and createincreased housing options for HCV families.	
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Housing choice	
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Increased expenditure	
<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	The MTW activity applies to all assisted households	
<b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	New admissions and currently assisted households	
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types	
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all tenant-based units*	
<b>For HCV activities:</b> Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?		

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No	
Does this MTW activity require a hardship policy?	No	
Does the MTW activity require an impact analysis?	No	
Custom Questions: Custom questions are tailored to each MTW activity.		
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?	What types of units does this policy apply to? Other: Tenant based	
What is the maximum payment that can be made to a landlord under this policy?	Up to two months contract rent under the HAP contract.	
How many payments were issued under this policy in the most recently completed PHA fiscal year?	0	
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	\$0	

## Activity: C.4 Landlord Leasing Incentives; 4.c. Other Landlord Incentives (HCV)

Narrative. Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.	<ul> <li>Description:</li> <li>Housing Catalyst will issue a one-time payment to new landlords who rent a unit to a family with a Housing Choice Voucher. This monetary incentive would be available to landlords who had not received a HAP payment in the prior three years. Offering a financial reward to landlords for joining the program would increase the number of participating landlords, expand housing options into new neighborhoods, and address specific landlord issues. Payments made to the landlord would not exceed more than one month of the contract rent. The payment will be made to the landlord when a HAP contract is executed between the owner and Housing Catalyst.</li> <li>Agency goals for MTW Activity: Increase participating landlords and create increased housing options for HCV families.</li> </ul>
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Housing choice
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Increased expenditure

<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	The MTW activity applies to all family types	
<b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	New admissions and currently assisted households	
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types	
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all tenant-based units*	
<b>For PH activities:</b> Does the MTW activity apply to all public housing developments?		
<b>For HCV activities:</b> Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?		
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	Νο	
Does this MTW activity require a hardship policy?	No	
Does the MTW activity require an impact analysis?	No	
Custom Questions: Custom questions are tailored to each MTW activity.		
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?	What types of units does this policy apply to? Units/landlords new to the HCV program	
What is the maximum payment that can be made to a landlord under this policy?	\$500	
How many payments were issued under this policy in the most recently completed PHA fiscal year?	0	
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	\$0	

Activity: C.3 Reexaminations; 3.d. Self-Certification of Assets		
<b>Narrative.</b> Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.	<i>Description:</i> At reexamination, Housing Catalyst may allow the self- certification of assets up to \$50,000. This would lower barriers to participants in obtaining asset verification.	
	Agency goals for MTW Activity: Decrease administrative time required to follow up and secure documents, allowing staff to focus on other priorities. This waiver supports Housing Catalyst's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.	
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Housing choice	
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Neutral (no cost implications)	
<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	The MTW activity applies to all assisted households	
<b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	Currently assisted households	
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types	
<ul> <li>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</li> <li>For HCV activities:</li> <li>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</li> </ul>	<b>For HCV activities:</b> The MTW activity applies to all tenant-based units*	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No	
Does this MTW activity require a hardship policy?	No	
Does the MTW activity require an impact analysis?	No	
Custom Questions: Custom questions are tailored to each MTW activity.		
Please state the dollar threshold for the self-certification of assets.	\$50,000	

# Activity: C.2 Payment Standards and Rent Reasonableness; 2.d. Rent Reasonableness – Third-Party Requirement (HCV)

<b>Narrative.</b> Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.	<ul> <li>Description: Housing Catalyst will use MTW flexibility to perform rent reasonable determinations on units that it owns, manages, and/or controls. Housing Catalyst will make reasonable rent determinations with the support of third-party software that taps into a national database. This process will ensure fair and valid determinations.</li> <li>Agency goals for MTW Activity: Increase rent reasonable turn window to support on-time reporting. This waiver supports Housing Catalyst's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.</li> </ul>
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Housing choice
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Neutral (no cost implications)
<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	The MTW activity applies to all assisted households
<b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	New admissions and currently assisted households
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	<b>For HCV activities:</b> The MTW activity applies to all tenant-based units*
For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

Custom Questions: Custom questions are tailored to each MTW activity.	
Please explain or upload a description of the quality assurance method.	Reasonable rent determinations will be made with the support of a third-party database that is updated annually based on market conditions.
Please explain or upload a description of the rent reasonableness determination method.	The agency will determine rent reasonableness with the support of third-party software. Housing Catalyst will enter demographic information for each type of unit, including location, quality, size, type, age of unit, amenities, maintenance, and utilities to be provided by the owner.

# Activity: C.5 Housing Quality Standards; 5.c. Third-Party Requirement (HCV)

Narrative. Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.	<ul> <li>Description:</li> <li>Housing Catalyst will perform Housing Quality Standards (HQS) inspections on project-based units that it owns, manages, and/or controls. Housing Catalyst will establish and make available a quality assurance method to ensure an objective analysis, and at the department's request, the agency will obtain the services of a third-party entity to determine if a Housing Catalyst owned unit passes HQS. HQS inspection standards will not be altered from the guidance found at 24 CFR 982.401. The participant will be able to request an interim inspection at any time.</li> <li>Agency goals for MTW Activity: Streamline the HQS inspection process to match non-PHA owned HQS inspections. This waiver supports Housing Catalyst's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.</li> </ul>
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Housing choice
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Decreased expenditures
<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	The MTW activity applies to all assisted households
<b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	New admissions and currently assisted households
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types

<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	<b>For HCV activities:</b> The MTW activity applies to all tenant-based units*	
<b>For HCV activities:</b> Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?		
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No	
Does this MTW activity require a hardship policy?	No	
Does the MTW activity require an impact analysis?	No	
Custom Questions: Custom questions are tailored to each MTW activity.		
Please explain or upload a description of the quality assurance method.	Housing Catalyst supervisor will re-inspect a sample of units (10% quarterly) for quality control of HQS inspections in accordance with 24 CFR 982.405(b) and 24 CFR 985.2.	

## Activity: C.9 Project Based Voucher Program Flexibilities (PBV); 9.a. Increase PBV Program Cap (HCV)

Narrative. Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.	<i>Description:</i> Housing Catalyst may eliminate the selection process in the award of Project Based Vouchers to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. A subsidy layering review will still be conducted and all site selection requirements will be followed. Housing Quality Standards (HQS) inspections will be performed by an independent entity according to 24 CFR 983.59 (b) and 983.103 (f) or by Housing Catalyst if the third party requirement waiver (5.C) is approved as a part of the MTW plan. The agency will follow the procedures outlined in Notice PIH 2013-27 where applicable, or its successor. The agency acknowledges the property must be owned by a single-asset entity of the agency per the guidance of PIH notice 2017-21.H. <i>Agency goals for MTW Activity:</i> Increase the number of participating landlords and create increased housing options; create family stability in an environment with support to encourage family self-sufficiency.
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Housing choice
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Neutral (no cost implications)

<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	The MTW activity applies to all assisted households	
Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	New admissions and currently assisted households	
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types	
<ul> <li>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</li> <li>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</li> </ul>	For HCV activities: The MTW activity applies to all tenant-based units*	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No	
Does this MTW activity require a hardship policy?	No	
Does the MTW activity require an impact analysis?	No	
Custom Questions: Custom questions are tailored to each MTW activity.		
What percentage of total authorized HCV units will be authorized for project-basing?	Not more than 50%	

## Activity: C.9 Project Based Voucher Program Flexibilities (PBV); 9.b. Increase PBV Project Cap (HCV)

<b>Narrative.</b> Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.	<ul> <li>Description: Housing Catalyst may raise the Project Based Voucher cap within a project up to 100%.</li> <li>Agency goals for MTW Activity: Create family stability in an environment with support to encourage family self-sufficiency.</li> </ul>
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Housing choice
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Neutral (no cost implications)

<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	The MTW activity applies to all assisted households
<b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	New admissions and currently assisted households
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all tenant-based units*
<b>For HCV activities:</b> Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

# Activity: C.9 Project Based Voucher Program Flexibilities (PBV); 9.c. Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement (HCV)

<b>Narrative.</b> Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.	<ul> <li>Description:</li> <li>Housing Catalyst may eliminate the selection process in the award of PBV to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site.</li> <li>Agency goals for MTW Activity:</li> <li>Streamline the selection process for PBV. This waiver supports Housing Catalyst's larger goal of using MTW flexibility to streamline administrative processes.</li> </ul>
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Housing choice
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Neutral (no cost implications)

<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	The MTW activity applies to all assisted households
<b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	New admissions and currently assisted households
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all tenant-based units*
<b>For HCV activities:</b> Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

\*Currently seeking HUD approval to extend these waivers to Veterans Affairs Supportive Housing (VASH) and Emergency Housing Vouchers (EHV).

D.	Safe Harbor Waivers		
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D. 1 S	Safe Harbor Waivers seeking HUD Approval:	No	

Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?

Е.	Agency-Specific Waivers.	

No

## E. 1 Agency-Specific Waivers for HUD Approval:

Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?

F. Public Housing Operating Subsidy Grant Reporting.

**F. 1** Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.

N/A

G.

MTW Statutory Requirements.

75% Very Low Income – Local, Non-Traditional.N/AHUD will verify compliance with the statutory requirement<br/>that at least 75% of the households assisted by the MTW<br/>agency are very low-income for MTW public housing units<br/>and MTW HCVs through HUD systems. The MTW PHA<br/>must provide data for the actual families housed upon<br/>admission during the PHA's most recently completed Fiscal<br/>Year for its Local, Non-Traditional program households.N/A

н.	Public Comments.

Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.	Pending Public Hearing on August 29, 2023 at 1 p.m.
Please attach a narrative describing the MTW agency's analysis of the comments and any decisions made based on these comments.	Pending Public Hearing on August 29, 2023 at 1 p.m.
If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	N/A

I.	Evaluations.
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Please list any ongoing and completed evaluations of the MTW agency's MTW policies, that the PHA is aware of, including the information requested in the table below. In the box "title and short description," please write the title of the evaluation and a brief description of the focus of the evaluation.	N/A
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MTW Certifications of Compliance.

The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD. Certification is provided below.	To be completed after public comment period