HOUSING CATALYST

HOUSING CATALYST &
LARIMER COUNTY HOUSING AUTHORITY

PHA Annual Plan 2026

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Streamlined Annual PHA Plan *(HCV Only PHAs)*	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 9/30/2027

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services. They also inform HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-, very low-, and extremely low- income families.

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

(1) ***High-Performer PHA*** - A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers (HCVs) and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, SEMAP for PHAs that only administer tenant-based assistance and/or project-based assistance, or PHAS if only administering public housing.
(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
(3) ***Housing Choice Voucher (HCV) Only PHA*** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
(4) ***Standard PHA*** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
(5) ***Troubled PHA*** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
(6) ***Qualified PHA*** - A PHA with 550 or fewer public housing dwelling units and/or HCVs combined and is not PHAS or SEMAP troubled.

A. PHA Information.

A.1

PHA Name: Housing Catalyst **PHA Code:** CO041
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2026
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Housing Choice Vouchers (HCVs) 1621
PHA Plan Submission Type: ☑ Annual Submission ☐ Revised Annual Submission

Public Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans.

How the public can access this PHA Plan: The plan is available for public review on our website and in our office during regular business hours

☐ **PHA Consortia:** (Check box if submitting a joint Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program

B. Plan Elements.

B.1 Revision of Existing PHA Plan Elements.

a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?

Y	N	
☐	☑	Statement of Housing Needs and Strategy for Addressing Housing Needs.
☐	☑	Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
☐	☑	Financial Resources.
☐	☑	Rent Determination.
☐	☑	Operation and Management.
☐	☑	Informal Review and Hearing Procedures.
☐	☑	Homeownership Programs.
☐	☑	Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.
☐	☑	Substantial Deviation.
☐	☑	Significant Amendment/Modification.

	(b) If the PHA answered yes for any element, describe the revisions for each element(s):
B.2	**New Activities.** (a) Does the PHA intend to undertake any new activities related to the following in the PHA's applicable Fiscal Year? Y N ☐ ☑ Project-Based Vouchers (b) If Project-Based Voucher (PBV) activities are planned for the applicable Fiscal Year, provide the projected number of PBV units and general locations, and describe how project-basing would be consistent with the PHA Plan.
B.3	**Progress Report.** Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan. Seeattachment
B.4	**B.4 Capital Improvements.** - Not Applicable
B.5	**Most Recent Fiscal Year Audit.** (a) Were there any findings in the most recent FY Audit? Y ☐ N ☑ N/A ☐ (b) If yes, please describe:
C.	**Other Document and/or Certification Requirements.**
C.1	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) have comments to the PHA Plan? Y ☐ N ☑ (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.2	**Certification by State or Local Officials.** Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	**Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed,* must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.4	**Challenged Elements.** If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y ☐ N ☑ (b) If yes, include Challenged Elements.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 4.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

Form identification: *CO041-Housing Catalyst Form HUD-50075-HCV (Form ID - 5903) printed by Traci McGraw in HUD Secure Systems/Public Housing Portal at 08/26/2025 11:30AM EST*

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan
(All PHAs)

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 09/30/2027

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, **Beth Rosen** (*Official's Name*), the **Policy & Compliance Mgr.** (*Official's Title*) certify that the 5-Year PHA Plan for fiscal years **2026-2030** and/or Annual PHA Plan for fiscal year **2026** of the **CO041 - Housing Catalyst** (*PHA Name*) is consistent with the Consolidated Plan or State Consolidated Plan including any applicable fair housing goals or strategies to:

City of Fort Collins
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR Part 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

Section will be completed by Beth Rosen -upon review of plan and Resident Advisory Board Comments or Public Comments

I/We, the undersigned, certify under penalty of perjury that the information provided above 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, 1014; 31 U.S.C. §3729, 3802).

Name of Authorized Official: **Beth Rosen**	Title: **Policy & Compliance Mgr.**
Signature:	Date:

This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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Form identification: CO041 - Housing Catalyst form HUD-50077-SL (Form ID - 5375) printed by Traci McGraw in HUD Secure Systems/Public Housing Portal at 08/26/2025 11:25AM EST

Certifications of Compliance with PHA Plan and Related Regulations *(Standard, Troubled, HCV-Only, and High Performer PHAs)*	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **OMB No. 2577-0226** **Expires 09/30/2027**

PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan," of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 01/2026, in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies, for the PHA's jurisdiction and a description of the way the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the Resident Advisory Board (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the way the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
    i. The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
    ii. The changes were duly approved by the PHA Board of Directors (or similar governing body); and
    iii. The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours. Where possible, PHAs should make documents available electronically, for public inspection upon request.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment. The PHA ensured all notices and meetings provided effective communication with persons with disabilities and further provided meaningful language access for persons with Limited English Proficiency (LEP).
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), Title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of all HUD programs. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the 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, Title II of the Americans with Disabilities Act, the Violence Against Women Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of all HUD programs.
7. The PHA will affirmatively further fair housing, in compliance with the Fair Housing Act, 24 CFR § 5.150 et seq., 24 CFR § 903.7(o), and 24 CFR § 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR § 5.151). Pursuant to 24 CFR § 903.15(c)(2), a PHA's policies should be designed to reduce the concentration of tenants and other assisted persons by race, national origin, and disability. PHA policies should include affirmative steps stated in 24 CFR § 903.15(c)(2)(i) and 24 CFR § 903.15(c)(2)(ii). Furthermore, under 24 CFR § 903.7(o), a PHA must submit a civil rights certification with its Annual and 5-year PHA Plans, except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document. The PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.
8. For PHA Plans that include a policy for site-based waiting lists:
    - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module and/or its successor system: the Housing Information Portal (HIP) in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).

9. The PHA will comply with the prohibitions against discrimination based on age pursuant to the Age Discrimination Act of 1975.
10. In accordance with the Fair Housing Act, the PHA will not base a determination of eligibility for housing on marital status and will not otherwise discriminate because of sex.
11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, 'Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped' for people with physical disabilities.
12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
13. The PHA will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implement the regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. 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.
17. The PHA will keep records in accordance with 2 CFR 200.302 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act**,** the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
21. All attachments to the Plan have been and will continue to always be available at all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA and, where possible, should be made available for public inspection in an electronic format.
22. The PHA certifies that it is following all applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Catalyst — PHA Name

CO041 — PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 20**26**

_ 5-Year PHA Plan for Fiscal Years 20-20

I/We, the undersigned, certify under penalty of perjury that the information provided above 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, 1014; 31 U.S.C. §3729, 3802)

Name of Executive Director: **Julie Brewen**		Name of Board Chairman: **Lizette Mill**	
Signature:	Date:	Signature:	Date:

This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

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Form identification: *CO041-Housing Catalyst form HUD-50077-ST-HCV-HP (Form ID -1644) for CY 2026 printed by Traci McGraw in HUD Secure Systems/Public Housing Portal at 08/26/2025 11:28AM EST*

B.3 Progress Report (Attachment-A)

Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

Goal 1: Provide affordable housing of the highest quality through effective property operations and asset management

- Housing Catalyst completed a Section 18 disposition of its remaining Public Housing in early 2024. Repositioned units are being renovated or redeveloped as affordable rentals or affordable home ownership opportunities.
- In fall 2024, Housing Catalyst completed a $3.4 million renovation of 2155 W Plum, a two-story, elevator-served apartment building now referred to as Plum Place. Repositioning the property from public housing to the Villages, Ltd. portfolio through HUD's Section 18 disposition process created an opportunity to design a healthy, sustainable community where residents could thrive.
- In spring 2025, Housing Catalyst completed a major redevelopment project at the Village on Impala, which included the renovation of 24 affordable duplex units. The updated community features large living spaces, improved accessibility and efficiency, and indoor and outdoor community spaces.

Goal 2: Increase supply of affordable housing

- In 2024, Housing Catalyst was among the first 16 recipients of voter-approved Proposition 123 Land Banking funds. This funding is intended to support Colorado communities as they acquire and preserve land for affordable housing. Housing Catalyst was awarded $1.3 million for the Village on Eastbrook, a three-story apartment complex that will bring 73 new apartments to southeast Fort Collins. The project is envisioned as a "Community for All Ages," incorporating senior- and family-friendly amenities.
- In 2025, Housing Catalyst completed a major renovation and redevelopment project at the Village on Impala. The updated and expanded Village on Impala is a thoughtfully designed development in northwest Fort Collins that provides 86 homes with affordable rents. The community features four newly constructed apartment buildings, twelve renovated duplexes, a new clubhouse and leasing office, active greenspace with a playground, and pedestrian/bicycle connectivity paths.
- Housing Catalyst's real estate development department has two major affordable housing projects in the pipeline. Combined, these projects will add ~150 homes with affordable rents to the community. Housing Catalyst is also serving as a Special Limited Partner on four affordable housing developments in Northern Colorado.

Goal 3: Increase housing opportunities for residents of Fort Collins and Larimer County

- Housing Catalyst administered more than $20 million in Housing Assistance Payments to local landlords in 2024.
- Housing Catalyst was selected to join the Landlord Incentives cohort of HUD's MTW demonstration program. The agency is implementing landlord incentives that aim to expand housing choice by increasing the number of local landlords participating in the Housing Choice Voucher program.
    - In 2024, Housing Catalyst implemented two landlord incentives – a $500 leasing bonus to landlords new to the Housing Choice Voucher program and a damage mitigation fund for any tenant-caused damages not covered by the security deposit.
- In 2024, the U.S. Department of Housing and Urban Development (HUD) and the U.S. Department of Veterans Affairs (VA) awarded Housing Catalyst $272,829 to fund 25 additional Veterans Affairs Supportive Housing (VASH) vouchers.

Goal 4: Enhance social and economic wellbeing for residents

- Housing Catalyst has supported hundreds of voucher holders in achieving their health, financial, career, and educational goals through the JumpStart Family Self-Sufficiency program. In 2024, 156 voucher holders participated in the program with 18 participants graduating. More than 50 participants are actively contributing to escrow accounts established through the JumpStart program.
- 136 Permanent Supportive Housing residents lived in stable homes with wraparound services for people with disabilities who experienced chronic homelessness. Housing Catalyst manages two Permanent Supportive Housing communities in Fort Collins – Redtail Ponds and Mason Place.
- The Campaign for Grade-Level Reading added Housing Catalyst to its Public Housing Communities Honor Roll. Honor Roll members demonstrate their leadership and depth and breadth of contributions in supporting children through a variety of programs and partnerships.
    - Housing Catalyst intentionally works to create place-based partnerships with local schools and service providers to support its educational programming. Educational offerings in 2024 included Camp Catalyst, a free summer camp for residents entering grade 3-5, and Back to School Nights at three properties where residents could meet teachers and connect with local resources.
- Resident Services Coordinators supported more than 250 residents referred for one-on-one support in 2024.

Goal 5: Achieve excellence in business operations

- Housing Catalyst continues to make efforts to more fully utilize Yardi software to improve internal and external processes. Voucher program applicants can complete their applications via an online portal and HCV landlords can review their HAP history online.
- Housing Catalyst has reviewed and refined many of its policies, processes, and standard operating procedures to promote more effective operations.
- Housing Catalyst has received the Certificate of Achievement for Excellence in Financial Reporting from the Government Finance Officers Association for eleven consecutive years. The achievement recognizes the transparency of the organization and demonstrates that financial reporting is robust and comprehensive.

Goal 6: Build community support for affordable housing

- Housing Catalyst staff represent the agency on more than 30 boards, committees and professional organizations, including the Fort Collins Chamber of commerce, the Fort Collins Affordable Housing Board, the Northern Colorado Continuum of Care, the Larimer County Interagency Oversight Group, and the Northern Colorado Rental Housing Association.
- Housing Catalyst leads and collaborates with a broad coalition of partners to coordinate services and engage the community. Partners include the Larimer County Office of Housing Stability, Homeward Alliance, Family Housing Network, and One Voice for Housing.
- Housing Catalyst CEO Julie Brewen was inducted as a National Association of Housing and Redevelopment Officials (NAHRO) Fellow in September 2024.
- Housing Catalyst received six NAHRO Awards of Merit in 2024. These awards recognized achievements in administrative innovation, resident and client services, and affordable housing development.

Goal 7: Advance Housing Catalyst as an employer of choice

- Housing Catalyst implemented a data-driven pay plan, working with an external consultant to set fair and attractive total compensation, including wages and benefits. All job openings and their pay ranges are disclosed to Housing Catalyst employees.
- The agency has successfully pioneered innovative work models including hybrid work agreements and a reduced work schedule pilot. Alternative work models are regularly reviewed and evaluated to ensure all employee and agency goals are being met.
- In addition to training in affordable housing and rental assistance programs, Housing Catalyst offers professional development for all employees in cultivating mutual respect and belonging, establishing psychological safety, and creating a mindful workplace culture.

Civil Rights Certification
(Qualified PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 09/30/2027

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as "the Plan," of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning 01/2026, in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the submission of the Plan and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), Title II of the Americans with Disabilities Act (42 U.S.C. 12101 *et seq*.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of all HUD programs. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the 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, Title II of the Americans with Disabilities Act, the Violence Against Women Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of all HUD programs. The PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR § 5.150 et seq., 24 CFR § 903.7(o), and 24 CFR § 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR § 5.151). Pursuant to 24 CFR § 903.15(c)(2), a PHA's policies are designed to reduce the concentration of tenants and other assisted persons by race, national origin, and disability. PHA policies include affirmative steps stated in 24 CFR § 903.15(c)(2)(i) and 24 CFR § 903.15(c)(2)(ii). Furthermore, under 24 CFR § 903.7(o), a PHA must submit a civil rights certification with its Annual and 5-year PHA Plans, except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document. The PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.

Larimer County Housing Authority
PHA Name

CO103
PHA Number/HA Code

I/We, the undersigned, certify under penalty of perjury that the information provided above 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, 1014; 31 U.S.C. §3729, 3802)

Name of Executive Director: **MS Julie Brewen**		Name of Board Chairman: **Lizette Mill**	
Signature:	Date:	Signature:	Date:

This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

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Form identification: *CO103 form HUD-50077-CR (Form ID - 4498) printed by Traci McGraw in HUD Secure Systems/Public Housing Portal at 08/26/2025 11:32AM EST*

HOUSING CATALYST
Building Community. Inspiring Change.

Resident Advisory Board Meetings

Meetings to review and discuss the 2026 PHA Annual Plan and MTW Supplement

DATES, TIMES & ATTENDANCE

Tuesday, September 2, 2025; 1:00-2:00 p.m. (online) – 9 participants

Wednesday, September 3, 2025; 3:00-4:00 p.m. (in-person) – 8 participants

QUESTIONS/COMMENTS

- **Utility Reimbursement**
  - How will the utility reimbursement waiver work?
    - Response: This waiver would only affect households whose tenant portion of rent is lower than the utility allowance. For those households, Housing Catalyst would no longer be issuing reimbursement checks for the utility allowance beyond the tenant portion of rent. (Staff provided an example scenario to illustrate how this works.)
  - When would the new system go into effect?
    - Response: These changes would be implemented at the biennial recertification following the 2026 MTW Supplement's approval.

- **Tenant Payment as a Modified Percentage of Income**
  - When would the new rent percentage go into effect?
    - Response: These changes would be implemented at the biennial recertification following the MTW Supplement's approval. This change would not affect households who were elderly, had a disability, or were determined to have a hardship.

- **Homeownership**
  - I want to have something to pass on to my kids. Are there options for homeownership through the voucher program?
    - Response: Housing Catalyst has paused its HCV homeownership program given current federal funding. We can refer participants to alternative programs that may offer homeownership opportunities like Habitat for Humanity.

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- **JumpStart Incentives**
    - How do JumpStart incentives work?
        - Response: Currently, for JumpStart participants who increase their earned income, the difference in the tenant portion of rent is saved in an escrow account that becomes available to them upon graduation. With the waivers requested in the 2026 MTW Supplement, the program would have more flexibility to offer incentives for achieving goals during the program, e.g. an incentive for completing a GED or maintaining a savings account balance.
    - Is the program only open to the head of household?
        - Response: The program is open to any adult in a participating household.

- **Federal Funding**
    - What's happening with the budget? Is my voucher in jeopardy?
        - Response: Housing Catalyst is closely monitoring progress on the federal budget and has been proactively taking steps to use every dollar effectively and minimize the impact of any cuts. We will keep participants informed as we know more, but at this point we don't know exactly what the impacts to voucher programs will be.

- **Payment Standards**
    - Does the maximum voucher payment go up as cost of living goes up?
        - Response: Housing Catalyst adjusts its payment standards based on the Fair Market Rent (FMR) study published by HUD. Payment standards must fall within 90-110% of fair market rent. Housing Catalyst has not requested an MTW waiver for an exception on payment standards.

INCORPORATION OF FEEDBACK

- No revisions were suggested to the 2026 PHA Annual Plan or MTW Supplement during the Resident Advisory Board meetings.
- If approved and implemented, Housing Catalyst will clearly communicate program changes and timelines to voucher program participants, especially relating to *the Tenant Payment as a Modified Percentage of Income* and *Utility Reimbursement* waiver.



QUESTIONS UNRELATED TO 2026 PHA ANNUAL PLAN

Participants referred to other departments or Rental Assistance Coordinators for individual follow-up.

- Has Housing Catalyst considered building modular homes to increase the supply of affordable housing?
- Does Housing Catalyst need a referral for the installation of energy-efficient HVAC systems? (resident of Mercy Housing)
- How do I enroll in the JumpStart Family Self-Sufficiency program?
- If my adult child gets a job, how will that impact my voucher?
- Why did a HUD inspector come to my house? Is HUD different than Housing Catalyst?
- How many people does Housing Catalyst have on staff? Why does my assigned Rental Assistance Coordinator sometimes change?

HOUSING CATALYST
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Public Hearings

Public hearings to review and discuss the 2026 PHA Annual Plan and MTW Supplement

DATES, TIMES & ATTENDANCE

Monday, September 8, 2025; 10:00-11:30 a.m. (in-person) – 4 participants

Tuesday, September 9, 2025; 3:00-4:30 p.m. (online) – 2 participants

QUESTIONS/COMMENTS

- **Landlord Incentives: Leasing Bonus**
  - Who gets the $500 leasing bonus?
    - Response: The property owner gets the $500 leasing bonus. This bonus is only for property owners who are new to the HCV program, or property owners who have not rented to a voucher holder in the past three years.
  - Why do you incentivize landlords, especially landlords who are using AI algorithms to drive up rent?
    - Bringing more landlords into the Housing Choice Voucher program increases housing choice for participants. Building good relationships with landlords also gives Housing Catalyst an opportunity to educate local landlords on topics like tenant protections and fair housing.

- **Tenant Payment as a Modified Percentage of Income**
  - What is the logic behind increasing the tenant portion from 30% to 35%?
    - Response: This activity meets two of MTW's goals – using federal dollars effectively and promoting self-sufficiency. This change will not affect voucher holders who are elderly or have a disability, and there will be a hardship policy in place.

- **Biennial Recertification**
  - Under this waiver I'll only have to go through recertification every two years instead of every year?
    - Response: Yes. You'll still need to report any changes in household income or composition, but you'll only go through the recertification process every two years. This waiver was approved for 2025 and will be implemented this year.

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- **Utility Reimbursement and Alternative Utility Allowance**
    - High utility allowances are affecting my ability to locate a home within the payment standard. Can't you just eliminate the utility allowance?
        - Response: While the utility allowance cannot be eliminated, implementing flat utility fees through the Alternative Utility Allowance waiver should make it easier to determine if rent on a particular home will fit within the payment standard. (Referred to Rental Assistance Coordinator for individual follow-up.)

- **Payment Standards**
    - It is very hard to find a 4-bedroom home in Fort Collins within the current payment standard. Are payment standards keeping up with market prices?
        - Response: Housing Catalyst adjusts its payment standards based on the Fair Market Rent (FMR) study published by HUD. Current payment standards fall within 90-110% of fair market rent. Since there tend to be fewer 4-bedroom homes on the rental market, you may want to expand your search to include options like 5-bedroom homes or duplexes. (Referred to Rental Assistance Coordinator for individual follow-up.)

- **JumpStart/FSS**
    - How would you handle incentives for income increases with a bracket model?
        - Response: The JumpStart program is currently considering two models. The first would tie escrow contributions to an income bracket. For example, people earning $1-10,000 would get $50/month paid to their escrow account, people earning $10,000-20,000/month would receive $150/month, and so on. The second model would tie escrow contributions to weekly hours worked. For example, people working 1-25 hours per week would get $50/month paid to their escrow account, and people working 26+ hours per week would receive $150/month. The goal is to capture more scenarios where participants are working hard to meet goals, but that hard work may not immediately show up through earned income. For instance, people's income may temporarily go down while they're completing a job skills training program. Additional incentives like payments for completing a GED or maintaining a certain savings balance would also support this goal.
    - Does JumpStart work with other entities?
        - Response: Yes. Our JumpStart Coordinators work one-on-one with participants to identify goals, connect with community resources, and serve as an accountability partner for their progress. Community partners support participants in a variety of ways depending on their purpose and model.

- **Federal Funding**
    - What's happening with Section 8 funding? Is it being reduced?
        - Response: Housing Catalyst is closely monitoring progress on the federal budget. We are looking at two areas of potential reduction – Housing Assistance Payments (tenant portion of rent, utilities, and escrow) and the admin fee (funding to operate the program). While we are looking for ways to stretch our dollars, we don't currently have any details on what the final cuts might be. We will clearly communicate any changes to voucher program participants as we know more.

INCORPORATION OF FEEDBACK

- No revisions were suggested to the 2026 PHA Annual Plan or MTW Supplement during the Public Hearings.
- Housing Catalyst will need a clear and timely communication plan for any changes to the Housing Choice Voucher program that result from the 2026 federal budget process.

QUESTIONS UNRELATED TO 2026 PHA ANNUAL PLAN

Participants referred to other departments or Rental Assistance Coordinators for individual follow-up.

- How do I share feedback about maintenance and communication issues at my property?
- How do I obtain a Colorado Portable Tenant Screening Report (PTSR)?
- What is happening with Housing Catalyst's Village on Eastbrook development?

Summary of Changes to the MTW Supplement in 2026

🔑 MAJOR ADDITIONS IN 2026

1. **New Waiver Requests (not in 2025 version):**
    - **Tenant Payment as a Modified % of Income (HCV)**
        - 35% of adjusted monthly income set as Total Tenant Payment.
        - Requires hardship policy and impact analysis.
        - Intended to decrease HAP expenditures and promote self-sufficiency
    - **Utility Reimbursements (HCV)**
        - Eliminates utility allowance reimbursements when greater than tenant payment.
        - Reduces costs and administrative burden
    - **Extending Initial Eligibility**
        - Extends time application documents are valid from 60 days to 120 days.
        - Applicants do not need to continually provide updated documentation if previously provided.
    - **FSS Program Changes (HCV – Contract of Participation modification)**
        - Modifies Family Self-Sufficiency (FSS) contract to allow more flexibility.
        - Escrow earnings will be linked to goal completion and earning brackets rather than directly to rent paid.

🔑 CHANGES TO PREVIOUSLY EXISTING ACTIVITIES

- **Alternative Reexamination Schedule (HCV):**
    - 2025: Planned for implementation (biennial recertifications)
    - 2026: Implemented starting Nov 2025; hardship policy tied to both reexamination and new tenant payment policy
- **Self-Certification of Assets (HCV):**
    - 2025: Threshold $50,000; categorized under *Housing Choice*.
    - 2026: Still $50,000 but categorized under *Cost effectiveness*; explicitly aligned with HOTMA

- **Damage Claims (HCV):**
    - 2025: Implemented in July 2024; no claims submitted yet.
    - 2026: Continues, still no claims by property owners
- **Other Landlord Incentives (HCV):**
    - 2025: $500 max payment; 4 landlords received incentives totaling $2,000.
    - 2026: Same $500 cap; 10 landlords received incentives totaling $5,000
- **Third-Party HQS/NSPIRE Inspections:**
    - 2025: Applied to PHA-owned units, with plan to expand in 2025.
    - 2026: Implemented for PBV in 2023, expanded to vouchers in 2025. Notes unexpected costs but workload reduction
- **PBV Portability Limitation:**
    - 2025: Planned policy (24 months instead of 12).
    - 2026: Implemented in Jan 2025; 2 families added to waiting list; no vouchers issued due to funding shortfall

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🔑 OTHER OBSERVATIONS

- **Document Length:**
    - 2025: 19 pages.
    - 2026: 22 pages – the difference reflects the added waiver sections.
- **Hardship Policy:**
    - 2025: Applied only to reexaminations.
    - 2026: Expanded to cover both reexaminations and tenant payment changes.

✅ IN SUMMARY:

The 2026 supplement builds on the 2025 plan by **adding four new waiver requests (tenant payment formula, eliminating utility reimbursements, extending portability, and FSS program changes)**, expanding the hardship policy, and updating the status of activities (some moved from "planned" to "implemented"). It also documents more landlord incentive payments and the operational rollout of reexaminations and HQS inspections.

Comparison Table

MTW SUPPLEMENT 2025 VS. MTW SUPPLEMENT 2026

Category / Activity	2025 MTW Supplement	2026 MTW Supplement	Status
Narrative Focus	Focus on **two landlord initiatives**: incentive payments & damage claims.	Continues landlord initiatives; **adds 4 new waivers**: Tenant Payment %, Utility Reimbursements, Extending Portability, FSS changes.	🔹 Expanded
Tenant Payment % of Income (HCV)	Not included.	**New waiver**: sets TTP at 35% of adjusted monthly income. Requires hardship policy & impact analysis.	🆕 Added
Utility Reimbursements (HCV)	Not included.	**New waiver**: eliminates utility reimbursement when allowance > tenant payment.	🆕 Added
Alternative Utility Allowance (HCV)	Planned for implementation.	Implementing 2026.	🔹 Updated
Alternative Reexamination Schedule (HCV)	Planned for implementation (biennial). Hardship required.	**Implemented** Nov 2025. Now tied to hardship policy also covering tenant payment waiver.	🔹 Updated
Self-Certification of Assets (HCV)	Allowed up to $50,000; framed as *Housing Choice*.	Same $50,000 threshold; aligned with HOTMA.	🔹 Updated
Damage Claims (HCV)	Implemented July 2024. No claims filed yet.	Continues. Still no claims filed by landlords.	✅ Unchanged
Other Landlord Incentives (HCV)	Max $500; 4 payments in FY totaling $2,000.	Max $500; 10 payments in FY, totaling $5,000.	🔹 Expanded
Third-Party HQS/NSPIRE Inspections	Planned expansion in 2025; already applied to PHA-owned units.	Implemented: PBV (2023), tenant-based vouchers (2025). Notes cost pressures but reduced workload.	🔹 Updated
Rent Reasonableness – Third-Party Requirement	Implementing, supported by software database.	Implemented Fall 2023; Switching to new provider Fall 2025.	🔹 Updated
PBV Program Cap (50%)	Allowed but not used in 2024.	Allowed but not used in 2025.	✅ Unchanged
PBV Project Cap (100%)	Allowed but not used in 2024.	Allowed but not used in 2025.	✅ Unchanged
PBV Selection for PHA-Owned Units	Allowed but not used in 2024.	Allowed but not used in 2025.	✅ Unchanged

PBV Portability Limit (HCV)	Planned change: 24 months instead of 12.	Implemented Jan 2025; 2 families added; no vouchers issued due to shortfall.	🔹 Updated
FSS Contract of Participation (HCV)	Not included.	**New waiver**: modifies FSS contract escrow linked to income/goals).	🆕 Added
Hardship Policy	Required for reexaminations only.	Expanded: covers both reexaminations and tenant payment policy.	🔹 Expanded
Document Length	19 pages.	22 pages.	🔹 Expanded

✅ SUMMARY OF CHANGES:

- **Four new waivers in 2026** (Tenant Payment %, Utility Reimbursements, Extended Initial Eligibility, FSS Contract changes).
- Several 2025 “planned” policies were **implemented by 2026** (Alternative Reexaminations, HQS Inspections, Alternate Utility Allowance, Rent Reasonableness).
- Landlord incentives show **greater uptake** in 2026.
- Hardship policy is **broader in scope**.

MTW CERTIFICATIONS OF COMPLIANCE

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

Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (01/01/2026), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

(1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.

(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.

(3) The MTW PHA certifies that the Board of Directors 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).

(4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.

(5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

(6) The MTW Supplement contains a signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies for the MTW PHA's jurisdiction and a description of the way the MTW Supplement is consistent with the applicable Consolidated Plan (24 CFR 91.2, 91.225, 91.325, and 91.425).

(7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. 24 CFR 5.151. The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.

(8) The MTW PHA will comply 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.

(9) In accordance with the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not base a determination of eligibility for housing based on actual or perceived sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity), will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.

(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, 'Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped' for people with physical disabilities.

(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

(13) The MTW PHA will comply 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.

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

(15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

(16) The MTW 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 MTW 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.

(17) With respect to public housing and applicable local, non-traditional development the MTW 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.

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

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

(20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.

(21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.

(22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.

(23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA and should be made available electronically, upon request.

Housing Catalyst	CO-041
MTW PHA NAME	***MTW PHA NUMBER/HA CODE***

I/We, the undersigned, certify under penalty of perjury that the information provided above 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, 1014; 31 U.S.C. §3729, 3802).

Julie Brewen	Chief Executive Officer
NAME OF AUTHORIZED OFFICIAL	***TITLE***
	September 18, 2025
SIGNATURE	***DATE***

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