



**ANN ARBOR HOUSING COMMISSION**

**FINAL**

**July 1, 2026 – June 30, 2027  
One Year Annual Plan  
And  
MTW Supplement Plan**

## Definitions and Acronyms

**Administrative Plan:** The policies and procedures that the Housing Commission has adopted, based on HUD and local regulations, that govern voucher programs.

**CAN:** Community Action Network. A nonprofit service provider located at the Northside Community Center. The AAHC contracts with CAN to directly serve public housing residents at Hikone and Green Baxter Courts. CAN also received a ROSS grant to serve all public housing residents become self-sufficient.

**CSTS:** Community Support and Treatment Services. Formerly Community Mental Health. The AAHC contracts with CSTS to provide services to residents primarily at Miller and Baker.

**FMR:** Fair Market Rent. HUD determines the Fair Market Rent by doing a rental market study and uses the 40<sup>th</sup> percentile of rental rates by unit size from the previous 2 years (not including new units and subsidized units).

**FSS:** Family Self Sufficiency program. A HUD program that encourages communities to develop local strategies to help voucher families obtain employment that will lead to economic independence and self-sufficiency.

**FUP:** Family Unification Program. A program under which Housing Choice Vouchers (HCVs) are provided to two different populations: 1. Families for whom the lack of adequate housing is a primary factor and 2. Youths who have attained at least 18 years and not more than 24 years of age and who have left foster care or will leave foster care within 90 days.

**FYI:** Foster Youth Initiative. A program which Housing Choice Voucher (HCV) assistance available to Public Housing Agencies (PHAs) in partnership with Public Child Welfare Agencies (PCWAs) to provide housing assistance on behalf of: Youth at least 18 years and not more than 24 years of age (have not reached their 25th birthday) who left foster care or will leave foster care within 90 days.

**HAP:** Housing Assistance Payment. A HAP contract is executed between the AAHC and a private landlord that has signed a lease with a Section 8 tenant so that the AAHC can pay the landlord a rent subsidy.

**HCV:** Housing Choice Vouchers. Formerly known as Section 8 vouchers. These vouchers are tenant-based vouchers unless they are specially designated as project-based vouchers. Tenant vouchers are attached to the tenant and provide a rent subsidy at whatever qualified unit a tenant moves to. Project based vouchers are attached to the unit so that any qualified tenant who lives in that unit, receives a rent subsidy.

**HQS:** Housing Quality Standard. A unit must be inspected to make sure that it meets the HQS standard before a unit is approved for a tenant with a Voucher.

**MS5:** Is a special purpose voucher program. Mainstream vouchers assist non-elderly persons with disabilities.

**MTW:** Moving to Work is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families.

**NED:** Non-Elderly Disabled. Housing Choice Vouchers (HCVs) awarded under different special purpose voucher program types to serve Category 1 vouchers non-elderly persons or families with disabilities to access affordable housing on the private market.

**PEACE:** Peace Neighborhood Center. A nonprofit service provider located on North Maple Road. The AAHC contracts with Peace to directly serve public housing residents at Maple Meadows and North Maple Estates.

**PIC:** HUD's inventory management system that the AAHC must report to HUD the inventory, condition, and occupancy of the public housing units.

**PHA:** Public Housing Authority. i.e Ann Arbor Housing Commission

**PHAS:** Public Housing Assessment System. HUD uses 10 indicators (such as occupancy rate, and accounts receivable from tenants) to monitor and rate Public Housing Authorities across the nation for their public housing properties.

**PNA:** Physical Needs Assessment. Conducted by an outside contractor to provide a guide to the AAHC on the physical condition of the buildings, the life expectancy of building features such as the roof or boiler, as well as the replacement cost.

**ROSS-SC:** Resident Opportunity and Self Sufficiency Service Coordinators. This three-year HUD grant will support the AAHC's tenants to earn skills, find employment and become self-sufficient.

**SEMAP:** Section Eight Management Assessment Program. HUD uses 15 indicators (such as HQS inspections, occupancy rate, and rent reasonableness) to monitor and rate Public Housing Authorities across the nation for their voucher programs (previously Section 8).

**VASH:** Veterans Affairs Supportive Housing. The special purpose voucher program combines HUD's Housing Choice Voucher (HCV) rental assistance for homeless Veterans with case management and clinical services provided by the Department of Veterans Affairs (VA).

**City of Ann Arbor Housing Commission**

**TOTALS**

<b>Location</b>	<b>Yr Built</b>	<b># of Units</b>	<b>Addresses</b>
Baker Commons (RAD PBV)	1980	64	106 Packard
Broadway Terrace (PBV)	1956	20	1504 - 1506 Broadway
Dunbar Tower	2026	63	121 Catherine
Garden Circle (Turnkey)	1971	1	2072 Garden Circle
Green Baxter Court (RAD PBV)	1970	23	1701 - 1747 Green Road
Hikone (RAD PBV)	1970	29	2702 - 2760 Hikone
Hillside Manor (PBV)	1996	6	1020 - 1042 Pennsylvania
Creekside (RAD PBV)	2021	32	3421 - 3429 Platt
Mallett's Creek (PBV)	1996	6	2670 -2680 South Main St
Maple Meadows (RAD PBV)	1970	29	800 - 890 South Maple
Miller Manor (RAD PBV)	1971	106	727 Miller
North Maple Estates (RAD PBV)	2016	42	657 - 741 North Maple
North Maple Duplexes (PBV)	1998	4	743 - 749 North Maple
Oakwood (PBV)	1969	3	3565 - 3685 Oakwood
South Seventh (PBV)	1969	8	221 - 253 S. Seventh
Upper Platt (Colonial Square)	1964	5	3681 -3689 Platt
West Washington (PBV)	1969	2	805 - 807 W. Washington
White/State/Henry (RAD PBV)	2021	32	1510 White, 1527 State, & 705 Henry
Lurie Terrace (Senior Housing)	1964	136	600 W. Huron
Siller Terrace	1962	16	1474-1484 Liberty, 1540-1582 Siller, & 528 Virginia
<b>Summation</b>		<b>627</b>	

<b>Streamlined Annual PHA Plan (HCV Only PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires: 09/30/2027</b>
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**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.

<b>A.</b>	<b>PHA Information.</b>
<b>A.1</b>	<p><b>PHA Name:</b> <u>ANN ARBOR HOUSING COMMISSION</u> <b>PHA Code:</b> <u>MI064</u>  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>07/2026</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Housing Choice Vouchers (HCVs)</b> <u>2073</u>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Public Availability of Information.</b> 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.</p> <p><a href="https://www.a2gov.org/housing-commission/">https://www.a2gov.org/housing-commission/</a>  727 MILLER AVE, ANN ARBOR MI 48103 - MAIN OFFICE  106 PACKARD AVE, ANN ARBOR MI 48104  2000 S. INDUSTRIAL HWY, ANN ARBOR 48104 - CENTRAL OFFICE</p>

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
Lead HA:				

**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):

**Other Policies:**

1. Increase minimum rent from \$50 to \$100 excluding disabled and elderly households.
2. Implement Alternative Reexamination Schedule from annually to biennially.
  - 2a. Perform full reexaminations of income must still occur at least every two years.
  - 2b. Allow at least one interim adjustment per year at the household's request if their gross income decreases by 10% or more.
  - 2c. Establish separate, more frequent reporting requirements every 180 days) for households claiming zero income to ensure data accuracy.
3. Adopt self-certification of assets and income where possible to reduce administrative burden. Complete full verification only at admission and using self-certification for certain income types during residency.
4. Establish a written hardship policy that defines when a family can bypass the standard interim limits due to severe financial distress.
6. Annualizing Income: Look at the total income over the previous 12-24 months to set a stable rent for the next two years.

**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.

Increase the number of Project-Based Vouchers in the City of Ann Arbor and other communities in Washtenaw County that have a strong economic base and public transportation. AAHC projects that approximately 200 vouchers will be converted to project-based vouchers by FY29.

**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.

The AAHC was approved by HUD to redevelop all its public housing to project-based vouchers under the RAD program. Phases 1, 2, 3, 4, & 5 are completed. The single-family Turnkey III home on Garden Circle is the only property HUD has been approved for conversion to HCV Tenant Protection Voucher assistance. Garden Circle is projected to be fully converted to during this fiscal year.

Through the RAD conversion program, AAHC demolished and built new housing at 3 former public housing properties. A total of 58 new apartments were added through the RAD conversion process. Continue to reinvest in existing RAD-converted properties to preserve this affordable housing.

AAHC will project-base up to 30% of the AAHC's budget authority to de-concentrate poverty and expand housing and economic opportunities for very low-income, homeless, and special needs households in the City of Ann Arbor and other high opportunity areas in Washtenaw County. The AAHC prioritizes PBV on Permanent Supportive Housing units.

Increased supportive housing for residents with complex needs spanning from homelessness, mental illness, substance use disorders, and/or other physical/mental disabilities.

<b>B.4</b>	<b>Capital Improvements.</b> – Not Applicable
<b>B.5</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y   N   N/A  <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<b>C. Other Document and/or Certification Requirements.</b>	
<b>C.1</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y   N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(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.</p> <p>The Resident Advisory Board (RAB) was held on December 3, 2025, at 5:00 pm. The meeting focused on the AAHC's Annual Plan and Agency Five Year Plan. Other topics included: MTW Supplement Plan; Biennial Annual Recertifications, Minimum Rent Increase, and Elimination of Utility Reimbursement Payments, and Modified Tenant Total Payment, and Elimination of deductions.</p> <p>Attendees: Asked to clarify the advantage of the alternative reexamination policy. She was in favor of implementing both the alternative reexamination policy as well as the modification of the percentage of income. She did not have strong opinion of the other proposed changes as she would be exempt from the elimination of deductions as well as the minimum rent policy. Ms. Harris expressed that she understood the disadvantage of increased minimum rent and elimination of the utility reimbursement payment for households with little to no income.</p>

C.2	<p><b>Certification by State or Local Officials.</b></p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>Enclosed</p>
C.3	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>Enclosed</p>
C.4	<p><b>Challenged Elements.</b> 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.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>

**AAHC FISCAL YEAR 2026 ANNUAL PLAN**

Plan Attachment

**Section B.1 Element Proposed Changes**

**Statement of Housing Needs and Strategy for Addressing Housing Needs.**

- A. **Housing Choice Voucher Waiting List.** The AAHC currently has the following preferences: persons with a disability, resident or works in Washtenaw or Monroe County, and a limited preference for homeless households. AAHC last opened its HCV waiting list on August 3, 2020; we received over 3,300 applications. AAHC has established a separate waiting list for the Mainstream Voucher program. We accepted applications from May to July 2025 of households qualified for households with a disabled adult between the ages 18-61. The waiting list was marketed to HCV waiting list applicants only. Below are the waiting list demographics as of 11/19/25:

**HCV Waiting List**

White	684
Black	2658
Asian	26
American Indian	17
Pacific Islander	3
Multiple Race	295
No Identification	0
Hispanic	143
Non-Hispanic	3540
Female	2975
Male	708
Elderly (Age 62 and older)	436
Disabled	625
Homeless	1401

**Mainstream Voucher**

White	225
Black	514
Asian	13
American Indian	7
Pacific Islander	0
Multiple Race	66
No Identification	0
Hispanic	38
Non-Hispanic	787
Female	558
Male	267
Elderly (Age 62 and older)	10
Disabled	815
Homeless	226

**AAHC FISCAL YEAR 2026 ANNUAL PLAN**

B. **Project Based Voucher Waiting List:** The AAHC currently has the following preferences: persons with a disability, resident or works in Washtenaw or Monroe County, seniors and a limited preference for homeless households. AAHC manages some site-based waiting lists and a combined waiting list for its PBV program and RAD PBV program. In October 2024, AAHC opened the PBV/RAD PBV waitlist for four (4) and five (5) bedroom units. In October 2024, the AAHC opened the site-based Charring Square Waiting List in Monroe County for one (1) and three (3) bedroom units. AAHC has an open waiting list for senior housing developments, Lurie Terrace and Courthouse Square. Below are the waiting list demographics as of 11/19/25:

**PBV Waiting List**

	<b>Charring</b>	<b>Lurie</b>	<b>Courthouse</b>	<b>RAD PBV</b>
White	145	262	301	349
Black	643	189	285	1425
Asian	5	14	14	14
American Indian	6	4	6	9
Pacific Islander	1	0	0	2
Multiple Race	82	23	33	169
No Identification	0	0	0	1
Hispanic	33	17	23	70
Non-Hispanic	849	475	616	1899
Female	698	285	377	1648
Male	184	207	262	321
Elderly (Age 62 and older)	39	479	411	144
Disabled	161	8	159	311
Homeless	516	150	228	758

**Administrative Plan Policies**

**Chapter 6. OVERVIEW OF RENT AND SUBSIDY CALCULATIONS: Minimum Rent**

AAHC administers the Housing Choice Voucher (HCV) program in accordance with HUD regulation and MTW Operation Notice. The agency may set a minimum rent that is higher than allowed under current statute and regulation not to exceed \$130 per month. AAHC will set the following minimum rent at \$130. Minimum rent will be \$50 for elderly families (62+) and families with a member with a disability. Minimum rent will be \$0 for homeless applicants who have zero-income.

**Chapter 11 – Annual Reexaminations**

AAHC administers the Housing Choice Voucher (HCV) program in accordance with HUD regulation and MTW Operation Notice. The PHA must conduct a reexamination of family income and composition at least every three years. The agency must allow at least one interim adjustment per year at the request of the household, if the household’s gross income has decreased 10% or more. AAHC will perform a reexamination of family income and composition biennially or every other year after initial admission to the program.

**Chapter 15 – Special Housing Types**

AAHC administers Homeownership special housing type voucher assistance. AAHC has amended its policy to ensure that participants in the HCV Homeownership program who are not exempt due to age or disability maintain the financial stability and earned income necessary to support the long-term sustainability of homeownership. This requirement aligns with the program's goal of fostering self-sufficiency.

This requirement applies to all households receiving HCV homeownership assistance where the head of household, spouse, or sole member is **not** elderly (age 62 or older) or disabled. Non-elderly, non-disabled participants must maintain full-time employment, defined as not less than an average of 30 hours per week. One or more adult members who own the home must collectively meet this requirement. Self-employment can be counted toward this requirement. The family must also continue to meet the minimum income requirements for the program as established by HUD and the PHA.

**AAHC FISCAL YEAR 2026 ANNUAL PLAN**

**Financial Resources:**

<b>2026 Planned Financial Sources and Uses</b>		
<b>Federal Sources</b>	<b>Planned (Est.)</b>	<b>Planned Uses</b>
Moving to Work Housing Choice Voucher Housing Assistance Payments (HAP)	\$23,400,000	MTW, HCV and PBV HAP Expenses
Moving to Work Housing Choice Voucher Admin Fees	2,025,000	MTW, HCV and PBV Administrative Expenses
Mainstream Voucher Program Housing Assistance Payments (HAP) & Admin Fees	\$3,550,000	Mainstream HAP and Administrative Expenses
Emergency Housing Voucher Housing Assistance Payments (HAP) & Admin Fees	\$385,000	Emergency Housing Voucher HAP and Administrative Expenses
Family Self-Sufficiency	\$200,000	Family Self-Sufficiency Program
Other (Fraud Recovery)	\$129,000	Voucher Programs and Central Office
Capital Funds and Operating Funds for Turnkey III	\$0	Garden Circle (MI064000100)
Other Federal Grants	\$1,000,000	Affordable Housing Development
<b>NON-FEDERAL SOURCES (LIST BELOW)</b>		
City of Ann Arbor General Fund	\$160,000	Voucher Administration, Central Office
Affordable Housing Millage	\$6,820,000	Affordable Housing Development, Tenant Services, and Administrative Expenses
Mental Health Millage Rebate	\$1,148,000	Tenant Services and Administrative Expenses
Other Revenue	\$5,959,702	Tenant Services and Administrative Expenses & Affordable Housing Development
<b>Total Resources</b>	<b>\$44,776,702</b>	

**AAHC FISCAL YEAR 2026 ANNUAL PLAN**

## **AAHC FISCAL YEAR 2026 ANNUAL PLAN**

### **Section Annual Plan B.2 New Activities and Five-Year Plan Goals and Objectives**

**Rental Assistance Demonstration (RAD) Project-Based Vouchers:** AAHC has requested a waiver from HUD to accept otherwise eligible Zero Housing Assistance Payment (HAP) families as new admission. HUD requires project-based voucher (PBV) families generate a housing assistance payment during initial leasing. The regulations states that families moving into PBV units must have HAP assistance at the point of move-in. The regulation excluded in-place families for the RAD PBV program. However, PHAs have the option to extend this exclusion in circumstances where low RAD PBV rents may prohibit a significant number of otherwise eligible families on the waiting list from being admitted to the project because they do not require subsidy, and which could consequently create an undue concentration of poverty at the project compared to non-RAD PBV projects. By implementing this regulation AAHC will increase housing opportunities to families and disrupt concentrated poverty at its sites. Upon HUD approval, AAHC will admit otherwise eligible families and to allow the units those families occupy to remain under the HAP contract even if AAHC has not paid HAP for the family in 180 days.

**Moving to Work:** AAHC was designated as a Moving-To-Work (MTW) agency in January 2022. MTW is a demonstration program for Public Housing Authorities (PHAs) to design strategies to help residents find or increase employment, become financially self-sufficient and increase housing opportunities for low-income households. The MTW program allows the AAHC more flexibility with how voucher program funds are administered. AAHC was selected for the MTW Landlord Incentives Cohort. AAHC will use the exemption allowed under MTW to establish strategies to increase and continue landlord participation in the HCV program and increase the successful lease-up and long-term housing stability of voucher participants. The MTW program objectives are to reduce costs, give households incentives to achieve economic self-sufficiency, and to increase housing choice. The intent is to serve the same number of low-income families as an MTW agency as the AAHC would if it did not have MTW funding flexibility. The AAHC will continue to serve a mixture of family sizes. The AAHC will ensure that 75% of the families assisted will have incomes at or below 30% of area median income. All assisted units will continue to meet housing quality standards (HQS), or NSPIRE, once implemented by HUD. Finally, the AAHC has established a reasonable rent policy that will encourage self-sufficiency for participating families.

**Garden Circle Turnkey III Section 18 Repositioning:** HUD approved the Section 18 disposition of Garden Circle, a single family home..

**Faircloth to RAD:** the AAHC has 3 additional units under the Faircloth regulations that can be developed under the RAD conversion process. However, the AAHC will close out its public housing program after Garden is disposed of under the Section 18 disposition process.

**New Development:** The Ann Arbor City Council passes a resolution to support an analysis of city-owned properties to determine if they are financially feasible to develop as affordable housing. The analysis was completed by the AAHC, and 10 properties were identified as good locations for affordable housing development. Each site is unique and will have a separate plan for its development. Properties were analyzed based on zoning, regulatory restrictions, environmental conditions, and eligibility for HUD and LIHTC funding. The AAHC spent 2 years on community

## AAHC FISCAL YEAR 2026 ANNUAL PLAN

engagement to understand the priorities of the community and to start discussing site concepts. The properties are in various stages of development and will be owned by separate legal entities. The City of Ann Arbor passed an affordable housing millage for 1 mil for 20 years, which will raise about \$7 million annually. It is anticipated that the millage will support the development (new construction, acquisition, and renovation) of approximately 1500 new affordable housing units for households up to 60% of the Area Median Income (AMI). The millage also allows for up to 20% of the funds to be used for tenant supportive services. The millage is a key component of the development strategy for the 10 city-owned properties to provide gap financing and tenants service funding.

- 1) 121 E Catherine, known as Dunbar Tower, is a 63-unit project under construction with tenants expected to move in between February and May 2026
- 2) 350 S 5<sup>th</sup> is a 330 unit project that has received zoning and site plan approval, and is expected to close on financing in the spring of 2026. Construction will be complete in 2028.
- 3) 1510 E. Stadium was acquired. Pre-development due diligence is underway.
- 4) 123 W. Summit was approved for acquisition. Pre-development due diligence is underway.
- 5) 404 N. Ashley was acquired and is currently being used temporarily for office space for the Shelter Association of Washtenaw County before it is developed as affordable housing

### **Section B.3. Annual and Five-Year Plan Progress Report**

*Please see the 4 goals from FY20 – FY24 Plan with a progress report for each goal*

- 1) Complete Redevelopment of all public housing units to Project Based Vouchers through the Rental Assistance Demonstration (RAD) project. Close-out Public Housing Program.

The AAHC was approved by HUD to redevelop all its public housing to project-based vouchers under the RAD program. Phases 1, 2, 3, 4, & 5 are completed.. Garden Circle was approved for conversion and is in process.

- 2) Preservation of RAD-converted properties

Through the RAD conversion program, AAHC demolished and built new housing at 3 former public housing properties. A total of 58 new apartments were added through the RAD conversion process. Phase 1, Miller Manor, was redeveloped with three (3) additional apartments. Phase 3 at N. Maple added 23 apartments. Phase 4 at Lower Platt (now known as Creekside Court) added 28 apartments and White/State/Henry (now known as State Crossing) added 4 apartments.

Continue to reinvest in existing RAD-converted properties to preserve this affordable housing.

- 3) Project-Based Voucher:  
Increase the number of Project-Based Vouchers in the City of Ann Arbor and other communities in Washtenaw County that have a strong economic base and public

## **AAHC FISCAL YEAR 2026 ANNUAL PLAN**

transportation. AAHC projects that approximately 200 vouchers will be converted to project-based vouchers by FY29.

- a. **Statement of need Consistent to PHA Plan:** AAHC will project-base up to 30% of the AAHC's budget authority to de-concentrate poverty and expand housing and economic opportunities for very low-income, homeless, and special needs households in the City of Ann Arbor and other high opportunity areas in Washtenaw County. The AAHC prioritizes PBV on Permanent Supportive Housing units. These activities are consistent with the AAHC's 5-year and Annual Plan as well as AAHC's mission.
- 4) Increase supportive housing for senior and residents with complex needs spanning from homelessness, mental illness, substance use disorders, and/or other physical/mental disabilities.
- a. Invest in senior housing through development and/or redevelopment
  - b. Increase support services for tenants in affordable housing and voucher program
  - c. Through community partnerships
  - d. Additional funding sources
  - e. Continue to work with partners and provide support to eligible families

### ***Continuum of Care (CoC)***

The AAHC is a board member of the Continuum of Care and will continue to partner with other CoC agencies to provide housing and services to homeless households. The AAHC currently has a partnership with Avalon Housing and Ozone House to provide housing and services to chronically homeless individuals and families through the HUD Continuum of Care program. A minimum of 59 of these households will be housed at AAHC properties and Avalon and Ozone House provide on-site services. These funds have enabled Avalon to provide 24/7 services at Miller Manor. The AAHC will partner with CoC agencies to enable participants to transition from Transitional Housing, Rapid Rehousing, and Permanent Supportive Housing to HUD-assisted housing.

### ***Support Service HCV Eviction Prevention***

The AAHC is partnering with SOS to provide eviction prevention and voucher program termination prevention for AAHC voucher program participants. The coordinated support service allows assist families to lease up in Ann Arbor and resolve landlord/tenant issues such as securing funds to avoid eviction and/or assistance with securing funds for outstanding utility bills and were able to retain their housing. AAHC will continue contracting services with SOS to provide voucher families assistance in maintaining their assistance.

The AAHC is partnering with the City of Ann Arbor to provide eviction prevention assistance to households in Ann Arbor who are behind in their rent and in danger of losing their housing.

### ***Support Service On-site PBV***

The AAHC contracts with Avalon Housing, Peace Neighborhood Center, Community Action Network, Ozone House, and Huron Valley PACE to provide on-site services for tenants at properties owned and managed by the AAHC and its affiliated legal entities.

**AAHC FISCAL YEAR 2026 ANNUAL PLAN**

## **AAHC FISCAL YEAR 2026 ANNUAL PLAN**

### ***Additional Voucher Support Services***

The AAHC is partnering with Avalon Housing and Michigan Ability Partners to assist AAHC voucher waitlist applicants lease up successfully and to provide ongoing support services.

Also, AAHC administers the Rising Hope program. Rising Hope assists housing choice voucher participants who have been impacted by the criminal justice system. Participants receive supportive services aimed to help families maintain their housing assistance. AAHC partners with several agencies to ensure family's needs are met.

### ***Family Unification Program (FUP)***

The AAHC is partnering with the Michigan Department of Health and Human Services (MDHHS), Washtenaw County Continuum of Care (CoC), and Ozone House to provide housing assistance to 32 families for the HCV Family Unification Program. AAHC continues to provide housing to eligible families.

The Family Unification Program (FUP) is a program under which Housing Choice Vouchers (HCVs) are provided to two different populations: Families for whom the lack of adequate housing is a primary factor in: the imminent placement of the family's child or children in out-of-home care, or the delay in the discharge of the child or children to the family from out-of-home care. In addition, Eligible youths who have attained at least 18 years and not more than 24 years of age and who have left foster care, or will leave foster care within 90 days, and is homeless or is at risk of becoming homeless at age 16 or older.

In addition to rental assistance, supportive services must be provided by the MDHHS to FUP youths for the entire 18 months in which the youth participate in the program; examples of the skills targeted by these services include money management skills, job preparation, educational counseling, and proper nutrition and meal preparation.

### ***Non-Elderly Disabled Mainstream Voucher (NED)***

The AAHC is partnering with 11 agencies to administer the NED Voucher program, all of whom serve persons with disabilities as a cornerstone of their non-profit mission or public agency purpose. AAHC administers 251 Mainstream vouchers.

NED HCVs enables non-elderly disabled families to lease affordable private housing of their choice. NED vouchers also assist persons with disabilities who often face difficulties in locating suitable and accessible housing on the private market. The target population for the NED program is any household that includes one or more non-elderly persons with disabilities.

In addition, eligible families included non-elderly persons with disabilities who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, currently experiencing homelessness, or those at risk of experiencing homelessness.

## **AAHC FISCAL YEAR 2026 ANNUAL PLAN**

### ***Emergency Housing Vouchers***

AAHC received an award for the Emergency Housing Vouchers (EHV) effective July 1, 2021. The Emergency Housing Voucher (EHV) program is available through the American Rescue Plan Act (ARPA). Through EHV, AAHC assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability.

Although, AAHC currently administers 26 EHV to eligible families. The EHV program is ending gradually as federal funds, provided through the American Rescue Plan, are used up. Funding is estimated to be depleted by late 2026. AAHC is working to transition EHV families into the traditional HCV program.

### ***Foster Youth Initiative (FYI) Vouchers***

AAHC received an award of 6 Foster Youth Initiative Vouchers (FYI) effective October 16, 2024. FYI provides housing choice vouchers (HCVs) for youth aged 18-24 exiting foster care. HUD makes FYI vouchers available to PHAs as needed, with specific funding notices released periodically for new or expanded participation. Youth can often extend the term of their housing assistance by enrolling in Family Self-Sufficiency (FSS) program or similar initiatives, making the support last longer.

In addition to rental assistance, supportive services must be provided by the MDHHS to FUP youths for the entire 18 months in which the youth participate in the program; examples of the skills targeted by these services include money management skills, job preparation, educational counseling, and proper nutrition and meal preparation.

### ***Additional Vouchers***

AAHC applied for 6 addition FUP vouchers in October 2024, however the application to HUD was not approved. On January 6, 2025, AAHC was awarded 41 vouchers for eligible VASH families.

### ***HUD HCV Administrative Fee Support***

Due to a competitive rental market around the country, it's increasingly becoming necessary to help families lease units. As a result, HUD revisited its current guidance on the eligible uses of administrative fees allowing PHA's to expanding such activities to cover costs that encourage housing stability for participants. To ensure success, AAHC administers funds directly to our partners that provide services to participating families that fit their specific needs.

Administrative activities also include housing search assistance activities such as pre-move counseling, helping a family identify and visit potentially available units during their housing search, helping a family find a unit that meets the household's disability-related needs, providing transportation and directions, and assisting with the completion of rental applications. These activities also include post-lease up activities often related to housing search assistance efforts, such as post-move counseling and landlord/tenant mediation. These activities cover HCV owner recruitment and outreach activities, including the costs associated with materials or webpages specifically geared to owners, as well as landlord liaison staff and associated expenses.

## AAHC FISCAL YEAR 2026 ANNUAL PLAN

### City of Ann Arbor General Fund Support

The City of Ann Arbor provides annual funding for resident supportive services through a variety of programs contracted to local non-profit service providers.

#### Section Annual Plan C.1: Resident Advisory Board Comments The Resident Advisory Board (RAB): *December 3, 2025, at 5:00 pm*

This meeting will focus on the AAHC's Annual Plan and Agency Five Year Plan. Other topics included: MTW Supplement Plan; Biennial Annual Recertifications, Minimum Rent Increase, and Elimination of Utility Reimbursement Payments, and Modified Tenant Total Payment, and Elimination of deductions.

#### ATTENDEES: Susan Harris and Weneshia Brand

**DISCUSSION:** A description of the AAHC's Annual Plan and Agency Five Year Plan was provided. The following topics were discussed: Biennial Annual Recertifications, Minimum Rent Increase from \$50 to \$100, and Elimination of Utility Reimbursement Payments, Modified Tenant Total Payment from 30% to 20%, and Elimination of deductions.

**Alternative Reexamination:** AAHC would perform certification every two years. A primary best practice is to **not** process interim rent increases between scheduled biennial recertifications unless a specific threshold is met. This allows families to keep 100% of their increased earnings until the next scheduled reexamination, directly supporting the MTW objective of family self-sufficiency. Mandate that interim reexaminations for decreases are only conducted if the adjusted annual income decreases by 10% or more. Establish a policy that automatically suspends minimum rents for 90 days or longer if a family proves a loss of income.

**Minimum Rent:** AAHC would increase the Minimum Rent from \$50 to \$100. AAHC would exclude elderly and disabled families from this specific minimum rent policy and implement a formal hardship policy to protect families experiencing a significant financial crisis. An estimated 15% of participating families will be impacted by the policy, experiencing a decreased utility reimbursement payment or incurring a nominal increase in tenant portion of rent responsibility.

**Utility Reimbursement Payments:** AAHC would eliminate utility reimbursement payments. A URP is triggered when this allowance is higher than the family's required rent contribution. Or, in cases where a tenant chooses a unit with a very low contract rent, the PHA's total subsidy (HAP) might actually be higher than the amount the landlord is charging. Approximately 11% of all families receive a URP. The Average URP Amount: \$185. The most vulnerable populations of those receiving assistance, 25% (64) are elderly or disabled households, 60% (114) of households receiving a URP who are not elderly or disabled have reported no source of income.

**Tenant Payment as a Modified Percentage of Income:** AAHC may modify the percentage of income used in the total tenant payment (TTP) calculation. TTP is the portion of rent a tenant is responsible for in the HCV or PBV program. Currently the rate is set at the HUD required minimum of 30%. We would reduce the TTP calculation from 30% to 20%.

## **AAHC FISCAL YEAR 2026 ANNUAL PLAN**

**Elimination of Deductions:** The agency may eliminate one, some, or all deductions. AAHC proposed to eliminate deductions for all households except elderly and disabled families, an example would include childcare expenses.

**Harris:** Asked to clarify the advantage of the alternative reexamination policy. She was in favor of implementing both the alternative reexamination policy as well as the modification of the percentage of income. She did not have strong opinion of the other proposed changes as she would be exempt from the elimination of deductions as well as the minimum rent policy. Ms. Harris expressed that she understood the disadvantage of increased minimum rent and elimination of the utility reimbursement payment for households with little to no income.

**Public Meeting:**

The Public Meeting scheduled for January 21, 2026

**Discussion:** A description of the AAHC's Annual Plan and MTW Supplement was provided. The following topics were discussed: Biennial Annual Recertifications and Minimum Rent Increase from \$50 to \$100. Other topics included: Elimination of Utility Reimbursement Payments, and Modified Tenant Total Payment, and Elimination of deductions.

**Public Comment:** No public comment

**Analysis and Recommendation:**

Based on the discussion during the recent meeting regarding the AAHC Annual Plan, as well as related topics including the MTW Supplement Plan, Alternative: Biennial Recertifications, Minimum Rent Increase, Elimination of Utility Reimbursement Payments, Modified Tenant Total Payment, and Elimination of Deductions, the following recommendations have been determined:

**Recommendation:**

- Implement the Alternative Reexamination Policy as discussed.
- Proceed with an increase to the Minimum Rent in alignment with program objectives.

All other proposed changes, including the elimination of deductions, utility reimbursement payments, and modifications to tenant total payment, will be tabled for future consideration.

END OF PAGE

**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 07/2026, 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).

**Ann Arbor Housing Commission**

PHA Name

**MI064**

PHA Number/HA Code

Annual PHA Plan for Fiscal Year **2026**

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: **MS Jennifer Hall**

Name of Board Chairman: **Dr. Lee Meadows**

f Signature: *Jennifer Hall* Date: *3/19/26*

Signature: *Lee E Meadows* Date: *3-19-2026*

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

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.

**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:** *MI064-Ann Arbor Housing Commission form HUD-50077-ST-HCV-HP (Form ID -2205) for CY 2026 printed by Weneshia Brand in HUD Secure Systems/Public Housing Portal at 02/12/2026 09:55AM EST*

**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 7/1/2026, 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-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. 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.

ANN ARBOR HOUSING COMMISSION

MI064

PHA Name

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:

JENNIFER HALL

Name of Board Chairperson:

DR. LEE MEADOWS

X Signature: Jennifer Hall

Date: 3/19/26

Signature: Lee J Meadows

Date: 3-19-2026

The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 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.

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**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, Gregory Dill, the Washtenaw County Administrator  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan for fiscal years N/A and/or Annual PHA Plan for fiscal year 2026 of the Ann Arbor Housing Commission is consistent with the PHA Name

Consolidated Plan or State Consolidated Plan including any applicable fair housing goals or strategies to:

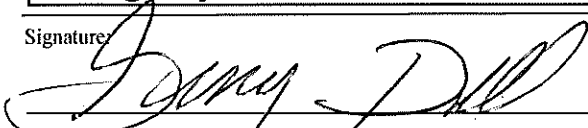
Washtenaw County  
*Local Jurisdiction Name*

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.

~~AAHC has completed redevelopment of all its 17 properties with more than \$66 million in funding obtained from a variety of sources. In addition, AAHC contracts with several nonprofits to provide services to tenants who reside in subsidized housing. AAHC will continue to maintain quality units and develop affordable housing.~~

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: <b>Gregory Dill</b>	Title: <b>Washtenaw County Administrator</b>
Signature: 	Date: <b>3/13/20</b>

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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# PHA Name : Ann Arbor Housing Commission

**PHA Code :** MI064

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 7/1/2026

**PHA Program Type:** Combined

**MTW Cohort Number:** Landlord Incentives

**MTW Supplement Submission Type:** Annual Submission

## **B. MTW Supplement Narrative.**

The Ann Arbor Housing Commission is deeply committed to providing excellent housing opportunities to current and future residents of Washtenaw and Monroe Counties. Within our jurisdiction exists immensely diverse communities, ranging from the dense urban centers of Ann Arbor and Ypsilanti, to the more sparsely populated townships of Superior and Scio. Many of these neighborhoods are complimented by strong school systems, low poverty rates, and desirable housing, while other neighborhoods are challenged by limited public services and diminishing economic opportunity. As a Moving To Work agency, we hope to increase housing choice in some of our highest opportunity and more economically exclusive communities. It is our belief that the MTW program will aid in our efforts to increase housing stability for our most vulnerable community members and allow us to establish long-term relationships with private sector housing providers. As AAHC continues to take major steps towards developing new affordable housing, our MTW activities will serve as an additional tool to provide more desirable housing for those most in need.

### **Cost Effectiveness:**

AAHC is eager to employ the funding and programmatic flexibility that MTW provides in order to more efficiently utilize its federally allocated funds. Our administrative processes, supportive services, and development projects will all benefit from MTW allowances and activities. The AAHC is actively partnering with local nonprofits, public agencies and local governments to increase the supply of affordable housing in the City of Ann Arbor, Washtenaw County, and Monroe County through financial tools, development of affordable housing on public property, project-based vouchers, zoning regulations and other public policy tools.

### **Self-Sufficiency:**

AAHC partners with many local non-profits, mainstream service providers, and the private sector to build healthy residential communities and promote an atmosphere of pride and responsibility. The AAHC has contracts with 7 non-profit agencies to provide on-site support service to tenants who live in AAHC properties. Including partnerships to provide eviction prevention services to all the AAHC's voucher tenants. AAHC aims to continue its supportive services efforts in preventing eviction and providing housing stability.

### **Increasing Housing Choice:**

Low-Income residents in Washtenaw County have limited opportunities for mobility due to the high housing costs throughout the county, especially in high opportunity areas. The MTW designation can help the AAHC provide more numerous and more desirable choices through higher payment standards and landlord incentives to expand our pool of participating landlords. HUD has recognized a growing number of populations with specific needs that often go unmet by the existing housing infrastructure. AAHC's goal is to develop programs and housing stock targeted to the most underserved populations. In pursuit of this goal, we currently administer several special purpose voucher programs in addition to the Housing Choice Voucher and Project Based Voucher programs.

**C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).**

<b>1. Tenant Rent Policies</b>	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Plan to Implement in the Submission Year
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Currently Implementing
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Currently Implementing
b. Damage Claims (HCV-Tenant-based Assistance)	Currently Implementing
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Currently Implementing
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
<b>6. Short-Term Assistance</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

**C. MTW Activities Plan that Ann Arbor Housing Commission Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.f. - Minimum Rent (HCV)</b>
<p><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</b></p> <p>AAHC plans to set a minimum rent of \$100 effective 7/1/2026, which is higher than allowed under current statute and regulation. Households where all member are elderly or disabled are exempt from this activity.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p> <p>New admissions and currently assisted households</p>
<p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies only to selected family types</p>
<p><b>Please select the family types subject to this MTW activity.</b></p> <p>Non-elderly, non-disabled families</p>
<p><b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b></p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p><b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b></p> <p>This activity applies to all tenant based units and project based voucher participants with the exception of VASH and EHV special purpose voucher programs.</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>The proposed implementation date for this activity is 7/1/2026.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the hardship policy apply to more than this MTW activity?</b></p>

Yes

**Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)**

1.f. - Minimum Rent (HCV); 2.a. - Payment Standards- Small Area Fair Market Rents (HCV); 2.b. - Payment Standards- Fair Market Rents (HCV); 3.b. - Alternative Reexamination Schedule for Households (HCV)

**Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**

No

**How many hardship requests have been received associated with this activity in the past year?**

127.00

**How many hardship requests were approved?**

127

**How many hardship requests were denied?**

0

**How many are pending?**

0

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

**Does the impact analysis apply to more than this MTW activity?**

No

**How much is the minimum rent or minimum Total Tenant Payment (TTP)?**

\$100.00

**2.a. - Payment Standards- Small Area Fair Market Rents (HCV)**

**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**

AAHC established a unique payment standard for "grouped" ZIP code areas. Payment Standards are reviewed annually and are set between 80% and 150% of the SAFMR.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased expenditures

**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

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

By grouping ZIP codes with similar SAFMR values, the agency reduced administrative complexity and staff workload compared to managing individual ZIP-level standards. SAFMR for every ZIP code can be confusing for families. Grouping simplifies the system into manageable categories, making it easier for clients to plan moves and understand their voucher value. Families have increased housing retention as well as housing opportunities in higher opportunity neighborhoods.

**Does this MTW activity require a hardship policy?**

Provided Already

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

**Does the impact analysis apply to more than this MTW activity?**

No

**Please explain the payment standards by ZIP code or "grouped" ZIP codes:**

Payment Standard which are set at an average of 102% of the SAFMR established for Metro Area Ann Arbor and Wayne County were grouped by zip code. The Payment was analyzed to ensure compliance.

Ann Arbor: SRO = \$1,271, 0 br = \$1,679, 1 br = \$1,700, 2 br = \$2,046, 3 br = \$2,464, 4 br \$2,742

Wayne: SRO = \$ 866 , 0 br = \$1,130, 1 br = \$1,230 , 2 br = \$1,550 , 3 br = \$1,898 , 4 br = \$2,055

## **2.b. - Payment Standards- Fair Market Rents (HCV)**

**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**

AAHC established a payment standard for areas not covered by SAFMR. Payment Standards are reviewed annually and are set between 80% and 120% of the FMR.

**Which of the MTW statutory objectives does this MTW activity serve?**

Self-sufficiency; Housing choice

**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)

**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

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

Setting a higher payment standards is a targeted strategy to increase housing access in high-opportunity areas, which supports self-sufficiency and housing choice, while also being cost-effective in the long run by reducing turnover and social costs.

**Does this MTW activity require a hardship policy?**

Provided Already

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

**Does the impact analysis apply to more than this MTW activity?**

No

**Please explain the payment standards by FMR:**

AAHC established a payment standard for areas not covered by SAFMR. Payment Standards are reviewed annually and are set between 80% and 120% of the FMR for Washtenaw and Monroe County. Note: AAHC does not service program participants in the Wayne County FMR areas.

Washtenaw: SRO = \$1,095 , 0 br = \$1,460 , 1 br = \$1,481 , 2 br = \$1,768 ,3 br = \$2,130 , 4 br = \$\$2,344

Monroe: SRO = \$720, 0 br = \$954, 1 br = \$1,059, 2 br = \$1,390, 3 br = 1,727, 4 br = 2,212

### **3.b. - Alternative Reexamination Schedule for Households (HCV)**

**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**

Effective 7/1/2026 AAHC proposes to perform reexaminations once every two years. AAHC will process decreases at the request household. AAHC will process all increases over \$2400 annually.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**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)

**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 only to a subset or subsets of assisted households

**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

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

AAHC manages nine properties with combined Low-Income Housing Tax Credit and Project-Based Voucher assistance. The following properties are exempt from the Alternative Reexamination schedule: Miller Manor, Maple Meadows, West Arbor, Baker Commons, Hikone, Green Baxter Court, Creekside, State Crossing, and Dunbar Tower.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

AAHC proposes to perform reexaminations once every two years effective 7/1/2026

**Does this MTW activity require a hardship policy?**

Provided Already

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

**Does the impact analysis apply to more than this MTW activity?**

No

**What is the recertification schedule?**

Once every two years

**How many interim recertifications per year may a household request?**

2 or more

**Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.**

AAHC will process decreases at the request household. AAHC will process all increases over \$2400 annually.

**4.a. - Vacancy Loss (HCV-Tenant-based Assistance)**

**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**

To incentivize a landlord's continued participation in the HCV program, the agency is authorized to make additional payments to the landlord.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Increased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b> New admissions and currently assisted households
<b>Does the MTW activity apply to all family types or only to selected family types?</b> The MTW activity applies to all family types
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b> The MTW activity applies to all tenant-based units
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> AAHC has retained and recruited new landlords to participate in the HCV program.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No
<b>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?)</b> To all units
<b>What is the maximum payment that can be made to a landlord under this policy?</b> Payments made to the landlord are equal to no more than one month of the contract rent.
<b>How many payments were issued under this policy in the most recently completed PHA fiscal year?</b> 5
<b>What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?</b> \$5,850

<b>4.b. - Damage Claims (HCV-Tenant-based Assistance)</b>
<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</b> To incentive a landlord's continued participation in the HCV program, the agency may provide landlords with compensation for damages.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b>

Housing choice
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Increased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies to all assisted households
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> Landlord's continue to participate in the HCV program.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No
<b>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?)</b> To all units
<b>What is the maximum payment that can be made to a landlord under this policy?</b> AAHC provides up to two months of contract rent minus the security deposit to cover remaining repairs.
<b>How many payments were issued under this policy in the most recently completed PHA fiscal year?</b> 50
<b>What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?</b> \$40,246

<b>4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)</b>
<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</b> AAHC provides incentive new landlords to join the HCV program and landlords who increase the number of units under HAP contract.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Housing choice
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Increased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies only to a subset or subsets of assisted households

**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

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to all tenant-based units

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

AAHC has incentivized new landlords to participant in the HCV program.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**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?)**

To all units

**What is the maximum payment that can be made to a landlord under this policy?**

Payment made to the landlord are equal to no more than one month of the contract rent.

**How many payments were issued under this policy in the most recently completed PHA fiscal year?**

10

**What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?**

\$10,000

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</b></p> <p>No Safe Harbor Waivers are being requested.</p>

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>				
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b> Yes</p> <table border="1" data-bbox="214 1243 1523 1428"> <thead> <tr> <th data-bbox="214 1243 870 1289">Title</th> <th data-bbox="870 1243 1523 1289">Supporting Documents Attached</th> </tr> </thead> <tbody> <tr> <td data-bbox="214 1289 870 1428">AAHC Waiver Request for Application of MTW Flexibilities to Special Purpose Vouchers HUD VASH and EHV Programs.</td> <td data-bbox="870 1289 1523 1428">0</td> </tr> </tbody> </table>	Title	Supporting Documents Attached	AAHC Waiver Request for Application of MTW Flexibilities to Special Purpose Vouchers HUD VASH and EHV Programs.	0
Title	Supporting Documents Attached				
AAHC Waiver Request for Application of MTW Flexibilities to Special Purpose Vouchers HUD VASH and EHV Programs.	0				

<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b> No</p>

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2026	\$0	\$0	\$0	2026-06-30

<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	<b>0</b>

\*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> Yes	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>	
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	# of unit months	
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	# of unit months	

**Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:**

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	<b>0</b>

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

I.	Evaluations.
	No known evaluations.

**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 07/01/2026, 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.

ANN ARBOR HOUSING COMMISSION  
MTW PHA NAME

MI064  
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).*

JENNIFER HALL  
NAME OF AUTHORIZED OFFICIAL

EXECUTIVE DIRECTOR  
TITLE

*Jennifer Hall*  
SIGNATURE

3/19/26  
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.*