

HOUSING & REDEVELOPMENT AUTHORITY OF CLAY COUNTY
Regular Meeting of November 16, 2021

MEMBERS PRESENT:

Tia Braseth, Anthony Dillard, Cecil Johnson, Mike Martin, and Kim Schlotfeldt in person, Les Bakke via Zoom.

MEMBERS ABSENT:

None

STAFF PRESENT:

Dara Lee and Sheila Laney.

9:30 A.M. REGULAR MEETING CALLED TO ORDER:

AGENDA:

A motion was made by Commissioner Martin to approve the agenda. Commissioner Dillard seconded the motion and it carried unanimously.

MINUTES FROM OCTOBER 19, 2021 REGULAR MEETING:

A motion was made by Commissioner Schlotfeldt to approve the October 19, 2021 regular meeting minutes. Commissioner Dillard seconded the motion and it carried unanimously.

CITIZENS TO BE HEARD:

None

TREASURER'S REPORT:

September financials were reviewed by Treasurer Martin. As discussed previously, most projects are performing well.

Commissioner Dillard made a motion to approve the Treasurer's Report. The motion was seconded by Commissioner Braseth and carried unanimously.

A motion was made by Commissioner Martin and seconded by Commissioner Dillard to open the Public Hearing. The motion carried unanimously.

PUBLIC HEARING RE: 2022 STREAMLINED ANNUAL PLAN FOR HCV ONLY AGENCIES & CHANGES TO HCV ADMINISTRATIVE PLAN:

On September 29, 2021, the HRA published a Notice of Public Hearing regarding the 2022 Streamlined Annual Plan for HCV Only Agencies and changes to the Administrative Plan.

To date, the HRA has received no public comments regarding the plan or proposed changes. The proposed 2022 Streamlined Annual Plan was reviewed.

Below is a summary of the proposed changes to the HCV Administrative Plan:

CHAPTER 3: ELIGIBILITY

The proposed change added section 3-II.F. EIV SYSTEM SEARCHES which includes Existing Tenant Search, Debts Owed to PHA's Terminations and Income and IVT Reports subsections. The proposed policy change provided language as to when these reports are pulled, and the policy does match current procedures for running these reports.

CHAPTER 4: APPLICATIONS, WAITING LIST AND TENANT SELECTION

The proposed PHA Policy change is to add the Emergency Housing Vouchers to the targeted funding.

The other proposed PHA policy change is to the Local Preferences:

- Add Moorhead Public Housing's formerly public housing units to the twelve-point preference
- Take off the Tenant Education Program from the preferences
- Change the two-point preference to state at the beginning:

The PHA will offer a two (2) point preference to households who reside in Clay County, Minnesota, this includes those who work or have been offered work in Clay County, Minnesota. This residency preference will not have the purpose or effect of delaying or otherwise denying admission to the program based on the race, color, ethnic origin, gender, religion, disability, or age of any member of an applicant family in addition to the residency preference households must meet one of the following additional preferences:

CHAPTER 5: BRIEFINGS AND VOUCHER ISSUANCE

The Proposed policy change allows us to do remote briefings over the phone, via video conferencing, or through other virtual platforms.

CHAPTER 8: INSPECTIONS AND RENT REASONABLENESS

The proposed change added a section on Remote Video Inspections under PART II: THE INSPECTION PROCESS. The proposed PHA policy is that we will not do remote HQS inspections.

CHAPTER 16: PROGRAM ADMINISTRATION

The proposed change added sections on Remote Informal Reviews, Conducting Informal Reviews, Remote Informal Hearings, Conducting Informal Hearings, and Ensuring Accessibility for Persons with Disabilities and LEP Individuals. The proposed PHA policy is that we will not do informal reviews or informal Hearings at this time.

CHAPTER 17: PROJECT-BASED VOUCHERS

The proposed change added the required language on what the advertisement will state and that participation in the PBV program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements under the PHA policy for Solicitation and Selection of PBV Proposals

CHAPTER 19: SPECIAL PURPOSE VOUCHERS

The proposed change is to add this chapter to the Administrative Plan. This chapter discusses the administration of the Foster Youth to Independence program (FYI), the Veterans Affairs Supportive Housing program (VASH), and the Mainstream program all of which are programs that we are currently administering. It also outlines how Family Unification Program or Non-Elderly Disabled vouchers would be administered by Clay County HRA if we were awarded these vouchers in the future. The proposed PHA Policy is to approve the chapter.

TEMPORARY POLICY SUPPLEMENT: EMERGENCY HOUSING VOUCHERS

The proposed change is to add this policy supplement to the Administrative Plan. This supplement discusses the administration of the Emergency Housing Vouchers that were awarded to us on July 1, 2021. The proposed PHA policy is to approve the supplement.

Detailed changes were available for review at the meeting.

The Resident Advisory Board met regarding the plan and proposed changes on November 9, 2021. Residents were supportive of the plan and had no comments.

Commissioner Dillard made a motion to close the Public Hearing. The motion was seconded by Commissioner Schlotfeldt and carried unanimously.

PROJECT UPDATES:

Director Lee provided project updates.

Houge Estates

Houge Estates is a 60-unit apartment building located in Dilworth. All units are one-bedrooms (about 650 sq. ft.), and residents must have a disabling condition or be age 62 or older to reside there. Residents pay 30% of their income towards their rent and utilities. The remainder of the rent is subsidized by HUD through a Housing Assistance Payment (HAP) contract with HUD.

It was built in 1981 and is owned by the Elderly Housing Corporation of Clay County (EHC), a 501(c)(3) non-profit. The non-profit was created by the HRA to develop this project. The HRA has managed the EHC and Houge Estates since their inceptions.

The HRA offices were located at Houge Estates from 1981 until the early 1990s. From 2002 until 2015 assisted living services were available in the building through a third-party provider. The provider continuously lost money providing services in the building and had to withdraw. We could not find any other providers willing to replace them.

The building received a minor renovation in 2013 (primarily windows and kitchens) which was funded with a deferred loan from the Minnesota Housing Finance Agency through the Rental Rehabilitation Deferred Loan program.

Over the years, the composition of the building has shifted from primarily elderly to primarily younger disabled individuals.

As of November 1, there were seven vacant units. There are three additional move-out notices for the end of November. Two full applications are being processed, and at the end of October, 20 additional people were notified that they are at the top of the waiting list. There are eighty households on the waiting list. The waiting list is currently open.

The Houge Estates Service Coordinator and a Homeless Programs Assistant are housed at this location.

Agassiz Apartments

Agassiz Apartments is a 12-unit apartment building located in Ulen. Eleven of the units are one-bedrooms (about 650 sq. ft.) and one is a 2-bedroom, and residents must have a disabling condition or be age 62 or older to reside there. Residents pay 30% of their income towards their rent and utilities. The remainder of the rent is subsidized by HUD through a Housing Assistance Payment (HAP) contract with HUD.

It was built in 1978 with a loan subsidized through USDA Rural Development. It is owned and operated by the HRA. The building received a minor renovation in 2013 (primarily windows and kitchens) which was funded with a deferred loan from the Minnesota Housing Finance Agency through the Rental Rehabilitation Deferred Loan program.

Over the years, the composition of the building has shifted from primarily elderly to about half elderly and half disabled. The building was inspected by HUD REAC on November 9.

As of November 1, there are no vacant units. There are forty-six applicants on the waiting list.

Clay County Affordable Housing, LLC

The Clay County Affordable Housing units are in Dilworth, Ulen, and Hawley. They are composed of twelve duplexes located in neighborhood settings. The Dilworth and Ulen units were constructed in 1979 as Public Housing. The Hawley units were constructed in 1981 as Public Housing. Twenty-one units are 3-bedrooms and three are four-bedrooms.

They were operated by the HRA as Public Housing units until January 1, 2019, when the HRA “disposed” of its Public Housing units by “selling” them to the CCAH LLC, which is a non-profit LLC with the HRA as its sole member. The HRA opted to reposition its public housing and receive replacement Housing Choice Vouchers for the units. Maintaining the units as public housing was not financially viable. The HRA then transferred its public housing PROGRAM to the Moorhead Public Housing Agency on July 1, 2020. This was essentially the transfer of future funding streams from HUD since there was no property remaining. The HRA is in the process of closing out its public housing program with HUD now that all activities have been audited.

There are no outstanding debts on these buildings.

As of November 1, there are two vacant units in Hawley. There is no specific subsidy tied to these units. The openings are being advertised. Residents of these units receive a preference for a Housing Choice Voucher if they are eligible for a 3- or 4-bedroom voucher.

Boyer Apartments

The HRA purchased Boyer Apartments in 2006. The HRA received over \$100,000 in funding from the local adult mental health initiative to assist with the initial purchase and operations. Boyer Apartments are in south Moorhead and are two adjacent 4-plexes which were built in 1975 and 1976. One building consists of all 2-bedrooms and the other has 3 2-bedrooms and one 1-bedroom unit. The buildings were rehabilitated in 2008 with HOME funding. There are no outstanding debts on these buildings (except internally).

As of November 1, there are no vacant units. There are twenty-eight households on the waiting list. There is no specific subsidy tied to these units. Residents of Boyer Apartments receive a preference for a Housing Choice Voucher if their family size fits the available unit.

Fieldcrest Townhomes

In January 2017, the HRA purchased Fieldcrest Townhomes when it exercised a Right of First Refusal when the prior owner decided to sell the development. It was in poor condition. The HRA paid \$2 million for the 40-unit townhome development in south Moorhead. There are 20 2-bedroom and 20 3-bedroom units. There are twenty detached garages as well.

Residents pay 30% of their income towards their rent and utilities. The remainder of the rent is subsidized by HUD through a Housing Assistance Payment (HAP) contract with HUD. This contract dated back to 1980 when the building was initially constructed. The rents were suppressed, and there was significant deferred maintenance on the property. The contract expired in December 2020 and rents were raised to market levels.

Fieldcrest has been approved for \$1M in funding through the FHLB of Des Moines and over \$7M from Minnesota Housing. We anticipate a January closing. At the time of closing, the HRA will "sell" the development to the Fieldcrest Townhomes LLC. The LLC is a non-profit LLC with the HRA as its sole member. The sales price will pay off the existing mortgage and specials. The HRA also will receive 50% of its developer fee at that time.

The bid opening occurred on July 29 and three competitive bids were received. Kue Contracting has been selected as the low bidder. There is sufficient available funding to proceed without adding garages or replacing all water heaters. If contingency funds remain at the end of construction, we may be able to add back some of the garages.

The City of Moorhead previously recommended \$110,000 in funding for sidewalk repairs and Wi-Fi installation at the development using CDBG funding. They have reduced the amount due to insufficient repayment of funds. The sidewalk repairs were included in the bids received. We will request to shift the funds to other eligible needs. We hope that closing and the construction start will be in January 2022. The funding information was submitted to and approved by the Mortgage Credit team at Minnesota Housing on November 10. Closing should occur 60-120 days from that date.

As of November 1, there are 8 vacant units (four 2-bedrooms and four 3-bedrooms) which will be kept vacant during construction. There are 97 households on the waiting list which is closed.

Gateway Gardens

Gateway Gardens is a 24-unit permanent supportive housing apartment building in Moorhead. The HRA constructed the building in 2010 using Minnesota Housing financing. The funding is in the form of deferred loans that will be forgiven in part after 20 years and completely after 30 years of operations. The front desk is staffed 24/7.

Rent and services are subsidized primarily through the Housing Supports program. There also are five project-based Housing Choice Vouchers attached to units. We are a subgrantee of CAPLP for a DHS HSASMI (Housing Supports for Adults with Serious Mental Illness) grant that helps fund the front desk costs.

CCRI and GSSC, a private security company, each provide 12 hours of staffing per day. CCRI case management staff is transitioning to Housing Stabilization Services through Medical Assistance.

As of November 1, there is one vacant unit and one pending eviction proceeding. The vacancies will be filled through the coordinated entry system.

Housing Choice Vouchers

The HRA has administered a form of the current Housing Choice Voucher program since 1976. It is also known as Section 8. Tenants rent in the private market and pay at least 30% of their income towards rent and utilities. The HRA determines Payment Standards (rent limits) and utility allowances each year. HUD provides a fixed amount of funding based upon the federal budget approved by Congress each year. The HRA may lease up to its baseline number of units but not more than that number each year. The HRA has received insufficient funding to lease all its vouchers since 2012.

This program has more than doubled in size since 2017. In June 2017, the HRA had 360 vouchers and on July 1, 2021, it has 742 vouchers. The reason for the increase is as follows: 1) In July 2017, the Moorhead Public Housing Agency transferred its 95-unit program to the HRA; 2) from 2018-2021 the HRA was awarded 177 Mainstream vouchers; 3) in 2019 the HRA received 24 vouchers due to the repositioning of its Public Housing; 4) in 2018 the HRA received 15 VASH vouchers and in 2021 25 VASH vouchers; 5) in 2020 the HRA received 3 (all have now been rescinded) and in 2021 1 Foster Youth to Independence vouchers; and 6) on July 1, the HRA received 15 Emergency Housing Vouchers and 30 vouchers due to Moorhead PHAs repositioning of 30 of its Public Housing units.

The EHV program was funded through the American Rescue Plan Act. The EHV's come with higher administrative fees and service funding. They are targeted at those fleeing domestic violence, homeless, at risk of homeless, and recently homeless households.

As of November 1, 2021, there are a total of 676 households of a possible 742 leased from the HRA Housing Choice Voucher program. We are working with eleven additional households from other housing authorities. We have 550 vouchers under our main HCV HUD contract; 177 under our Mainstream HCV contract; and fifteen under our HCV Emergency Housing Voucher (EHV) contract.

Of the 550 vouchers under our main contract, 502 vouchers are leased: 431 of 455 regular vouchers; forty-eight out of 50 Tenant Protection Vouchers; 0 of 1 FYI vouchers; and 23 of 40 VASH vouchers. We have issued four regular vouchers; one tenant protection voucher; and 8 VASH vouchers. Five of the VASH vouchers are referrals from the Bemidji area. We are working with seven additional households to issue a regular voucher, five to issue a VASH voucher, and one to issue a tenant protection voucher.

160 out of 177 Mainstream vouchers are under lease. We have issued 15 Mainstream vouchers and are working with twelve additional households.

14 of 15 EHV vouchers are under lease and one additional voucher has been issued.

We have thirty-six individuals enrolled in our Family Self-Sufficiency program. We have had 44 FSS participants in the past 12 months. Staff is working with additional households to enroll them in the program. We can serve up to fifty households on the FSS program under our current Action Plan.

There are twenty households remaining on our waiting list that have not been contacted to issue a voucher. We will contact the remaining twenty before the end of the year.

Prairie Horizons Townhomes

Prairie Horizons Townhomes had one unit damaged by a tenant-caused fire at the end of July. HRA staff are working with the new property insurance provider HAI, Housing Authority Insurance, to see that repairs are made as quickly as possible. The unit will be gutted to the studs. The total cost is approximately \$200,000. This will be the largest claim in the 46-year history of the HRA. We have been notified by the contractor that due to shipping delays, it may be up to 6 months before the unit is finished.

Prairie Horizons Townhomes are eight townhome permanent supportive housing units for families located in south Moorhead, across from Fieldcrest Townhomes. The HRA constructed the development in 2012 using Minnesota Housing financing. The funding is in the form of deferred loans that will be forgiven in part after 20 years. There is a small portion (\$337,076) that is deferred for 30 years at 0% interest that must be repaid. The HRA owns and manages these eight units (5 2-bedrooms, 2 3-bedrooms, and 1 4-bedroom). The rents in these units are subsidized with project-based Housing Choice Vouchers. Services are provided through the HRA Cares grant. They are sometimes referred to as East Prairie Horizons Townhomes or EPHT.

These units are adjacent to another 8-unit town home permanent supportive housing development, which are confusingly also called Prairie Horizons Townhomes or Easten Townhomes – south units. There are four one-bedroom and four two-bedroom units. The HRA owns 0.01% as a Special Limited Partner in the Easten Townhomes LLC. The HRA provided a \$330,000 deferred loan when the project was constructed in 2006. It bears 5% interest and is due in 2036.

There are an additional thirty units in this development located in north Moorhead. The HRA has project-based 8 Housing Choice Vouchers in the 8 south units and an additional eight in the 30 north units. Support services are funded through the HRA Cares program.

An HRA staff person is officed at the site. She and a full-time CCRI employee provide supports to both Prairie Horizons Townhomes developments and other HRA Cares scattered-site participants. Both support services providers also have been providing DHS Housing Stabilization Services to the participants.

As of November 1, there are no vacant units other than the fire damaged unit. We have received a move-out notice for the end of December. There is one vacant 3-bedroom in the Easten units which is in the process of being filled.

HRA Cares

HRA Cares is a HUD-funded Continuum of Care program. It is for individuals and families who are literally homeless and have a family member with a disabling condition. There are no time limits on the rental assistance or supportive services. We provide supports at the two Prairie Horizons Townhomes developments and in forty-eight scattered-site units. HRA Cares also provides rental assistance in the forty-eight scattered-site units. We are authorized to serve sixty-four households with these funds. The HRA administers the rental assistance and administers the program. We contract with CCRI for one additional full-time case manager. HRA staff also supervise and provide support services.

We are currently serving fifty-four households. Of the 54, 14 are at Prairie Horizons Townhomes; one is at Bright Sky Apartments; and thirty-nine are in scattered-site units in Clay, Otter Tail, and Douglas Counties, MN, and in Fargo, ND. There are thirty-one singles and twenty-three families being served. Eleven households are searching for units.

We only are accepting applications through the Coordinated Access, Referral, Entry and Stabilization System (CARES). Those with the highest priority who meet the eligibility criteria will be accepted.

Homeless to Housed Rental Assistance

Homeless to Housed is a Minnesota-funded rental assistance program for high priority homeless families, youth, and singles across the counties of Clay, Douglas, Grant, Pope, Stevens, Traverse, and Wilkin. It is a time-limited program for households experiencing homelessness who are unable to immediately receive a Housing Choice Voucher. It operates similarly to the HCV program.

The grant was initially funded in 2008 to serve forty-five households. It has been renewed every 2 years since that time. Our current grant is to serve sixty-two households through September 30, 2023.

We are serving sixty of our authorized sixty-two households. Six more households are searching for a unit. There are nineteen singles and forty-one families currently being served. The grant targets families and youth-headed households. Leased households are from Clay, Traverse, Grant, and Douglas Counties. One family no longer needed a subsidy in October, and one transferred to a Housing Choice Voucher.

The coordinated entry system shifted its priority during the Covid-19 emergency to households residing outside or in shelters.

Homework Starts with Home

Homework Starts with Home is a relatively new program offered by Minnesota Housing. In 2014, the HRA was one of three initial pilot locations for a rental assistance program that focused on families with school age children. We participated in the pilot until it ended in 2018. At the end of the pilot, Minnesota developed Homework Starts with Home. The HSWH program was based primarily upon the pilot operated by the HRA.

The HRA was funded in each of the two rounds of competitive funding. Throughout this time, the HRA has been the lead agency in a partnership all working towards ending child homelessness. The initial pilot partners were Churches United for the Homeless, Moorhead Public Schools, and Lakes & Prairies Community Action Partnership (CAPLP). We now have forty-five partner agencies including fourteen school districts across seven counties.

Due to the considerable progress the HRA and its partner agencies have made in ending family and youth homelessness in the region, the partnership decided not to apply for Round 3 funding.

There has been a slight increase in the number of households identified since the school year began.

The current grant term runs from 8/1/2020-9/30/2023. We are anticipated to serve a total of seventy-two households during that time. We have served a total of sixty-one households thus far. Seventeen of these also were served under the first grant.

As of November 1, 38 households are leased; and thirteen households are searching for units. Fourteen new referrals have been received. These are primarily from Clay County. Current households are from Clay, Douglas, Wadena, and Otter Tail Counties.

Housing Supports (formerly GRH) in Scattered-Site Units

Housing Supports is a Minnesota-funded program operated through the Department of Human Services. It provides room and board payments (which we refer to as Rate 1) and supplemental services payments (which we refer to as Rate 2). Rate 1 pays for rent, utilities, telephones, transportation, and all basic needs items. Rate 2 pays for supportive services. We have a contract with Clay County Social Services to provide this program. We began providing it when we opened Gateway Gardens in 2010. Nineteen of the twenty-four units in the building use this funding source.

In 2016, we added a community option and started subcontracting for service provision with several area non-profit partners. The HRA does all program administration, administers all Rate 1, and provides some of the Rate 2 services. It is an extremely complex program to administer.

As of November 1, a total of 135 households are being served by the Housing Supports program in Clay County. There are 120 households leased in the scattered-site Housing Supports program – 9 with the HRA; 25 with CAPLP; 7 with the Presentation Partners in Housing; 10 with LMHC; 12 with Churches United; 9 with Metro Behavioral Health; 6 with the Lotus Center; and 37 with Summit Guidance. In addition, CCRI serves 15 Housing Supports clients at Gateway Gardens and 5 in scattered-site locations. 12 additional households are searching for units.

Minnesota DHS Community Infrastructure Grant

The Community Living Infrastructure Grant was a new grant program that began in 2018. Clay County is the grant recipient and the HRA is the project manager and provides the Housing Resource Specialist. The funds were allocated to help communities build up the necessary infrastructure so that individuals with disabilities can live fully integrated into the communities of their choice. The grant funds outreach workers, housing resource specialists, and administration. The original grant covered all ten counties in West Central Minnesota and the three Community Action Programs serving the counties who each performed outreach. Mahube-Otwa has chosen to remain a partner but not be a sub-recipient for the grant that began 7/1/2021.

The HRA now has a 1.0 FTE Housing Resource Specialist and a 0.05 project manager. There are 2 FTE outreach workers funded and employed by the CAP agencies. CAPLP (1.15 FTE) and WCMCA (.85 FTE) have hired dedicated outreach workers. The new grant also includes a full-time eligibility worker for Clay County Social Services.

Staff has been working diligently on property owner engagement strategies.

Minnesota DHS Housing Stabilization Services

Housing Stabilization Services are a new Medicaid benefit available in Minnesota. It became available July 1, 2020. The HRA was the second agency in West Central Minnesota to become an approved provider. The HRA was approved to provide Housing Stabilization Services – both Housing Consultation and Transition & Sustaining Services effective July 2020. Four staff are currently trained on one or more Housing Stabilization Services roles.

Staff began Housing Consultations in 2020. Staff completed thirteen consults in October. We have begun billing for transition and sustaining services. We have seventeen current approved clients for these services.

Due to staff transitions and an inability to recoup our costs, we will only be doing on-going consultations and will not accept any additional HSS Transition & Sustaining Services participants. The participant eligibility/billing approval has been an extremely slow process state-wide. Challenges continue to be worked on with the state. The HRA has invested over \$85,000 in non-reimbursable costs in establishing this program but needs to pause until the financial issues are resolved.

Through the GROWTH program, staff is leading a region-wide group aimed at getting this program to work for those who need it throughout our region.

Owner-Occupied Rehab Program

The HRA has operated and operates several distinct programs under the Owner-Occupied Rehab umbrella. The largest program is the Minnesota Department of Employment and Economic Development (DEED) Small Cities Development Program (SCDP). Funds used for this program are federal HUD Community Development Block Grant (CDBG) that are allocated to the state for Greater Minnesota. DEED then holds annual competitive application rounds to award these funds to non-entitlement communities.

The HRA first started administering CDBG funds in 1974 or 1975. The agency stopped the program in the early 1990's due to local political challenges. The HRA once again started administering the program through DEED SCDP in 2008. Only cities and counties may apply for the funding. The HRA serves as the administrator. Clay County was the applicant for the 2008, 2010, and 2012 funding rounds. The City of Barnesville was the applicant in 2014, the City of Sabin in 2016, and the City of Dilworth in 2021. The HRA has utilized HRA Tax Levy funds in 2010, 2014, 2019, and 2020 to leverage these rehabilitation resources. Clay County allocated \$80,000 in ARPA funds for this purpose.

All these loans have been deferred. Some have been forgiven after 10-15 years while others remain repayable. Each application has different terms.

Sabin

DEED awarded the City of Sabin SCDP funds to rehabilitate ten homes. Eight projects are complete; and two are just waiting for windows to arrive. We were on-track to complete the work and close out the grant by the end of September but needed an extension due to delays in window delivery. DEED has performed a project monitoring of the grant. There was one finding due to the funds being repayable to the HRA instead of the City of Sabin. If we would have changed the language to the payment to the HRA "on behalf of the City of Sabin," we would not have had the issue. We do not need to correct these loan documents but will change the language for future grants.

Dilworth

The HRA staff applied for funding on behalf of the City of Dilworth for 2021 CDBG funding to DEED through the Small Cities Development Program. We received letters of interest from sixty-seven homeowners and nine commercial properties. We applied for \$922,000 on behalf of Dilworth to rehabilitate twenty-one owner-occupied homes and seven businesses and were awarded the full amount requested in August. The environmental review process is complete, and staff has sent out applications to those home and business owners who expressed interest. Applications are due in December.

RLP (Minnesota Housing Rehabilitation Loan Program)

The Minnesota Housing Rehabilitation Loan Program is funded by the state. Funds are appropriated during each budget cycle. Local administrators work with homeowners to receive funding to rehabilitate their homes. Homeowners must be extremely or very low income to qualify for these funds. These funds can be used in conjunction with DEED SCDP and USDA HPG funds. The loan limit is \$37,500 per project. The funding is in the form of deferred loans that are forgiven after 15 years if the household continues to reside in the home.

The HRA administered the RLP program in the 1980's and early 1990's. It applied to be an administrator and started administering the funds again in 2012.

Seven applications are being processed, but people are not following through at this time.

STREAMLINED ANNUAL PHA PLAN AND CERTIFICATIONS OF COMPLIANCE:

The proposed 2022 Streamlined Annual Plan for HCV Only PHAs is attached. The Clay County HRA has been exempt from the Annual Plan submission process under the small agency exemption due to having fewer than 550 units. The HRA now administers 742 HCVs so must comply with the Annual PHA Plan requirements.

Pages 3 & 4 of the Annual Plan discuss our agency goals as included in our 2020-2024 5-Year PHA Plan and the progress we have made to date.

One of the Annual Plan requirements is that the Board approve HUD-50077-ST-HCV-HP, Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed. The certification is attached.

Commissioner Dillared made a motion to approve the 2022 Annual Plan and Certifications. The motion was seconded by Commissioner Schlotfeldt and carried unanimously.

APPROVAL OF PROPOSED CHANGES TO THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN:

The proposed changes are detailed above in Item #5. for the Public Hearing regarding these proposed changes.

A motion was made by Commissioner Braseth to approve the proposed changes to the Housing Choice Voucher Administrative Plan. Commissioner Schlotfeldt seconded the motion and it carried unanimously.

APPROVAL OF OPENING ADDITIONAL PREFERENCES FOR THE HOUSING CHOICE VOUCHER WAITING LIST:

The Housing Choice Voucher Waiting List is currently open to the following preference households:

- Households who are been terminated by the HRA from its HCV program due to insufficient program funding (*no one has ever been terminated for this reason so there are no eligible applicants.*)
- Households who live in Clay County HRA-owned or managed unsubsidized units or a former public housing unit through Moorhead Public Housing Agency (*by referral only*).
- Households whose head of household or spouse is 75 years of age or older.
- Households who are Clay County residents who are currently receiving time limited rental assistance (i.e., transitional housing) but will be terminated within 6 months due to reaching the time limit (*by referral only*).
- Households who are currently participating in a permanent supportive housing program in Clay County who, based upon a standardized assessment, are determined to no longer require permanent supportive housing (*by referral only*).
- Households who have participated in an HRA rental assistance program and been terminated by the HRA in the past two years due to an increase in earned income.
- Households applying to buildings with project-based vouchers;
- Youth ages 18-24 who are referred by Clay County Social Services for a Foster Youth Initiative voucher.

All the open preference categories have an extremely limited number of eligible applicants. All applicants on the current Housing Choice Voucher waiting list will be contacted before the end of December.

Staff proposes confirming the above preferences remain open and opening the Housing Choice Voucher waiting list to additional preference households. Both groups will need to meet the 2-point residency preference as well as the following:

- Households whose head of household or spouse is 50 years of age or older. This preference category is proposed to open on January 3, 2022; and
- Households who contain a disabled family member. This preference category is proposed to open February 1, 2022.

The number of waiting list applicants would be assessed in March 2022 to determine if additional preference categories should be opened (i.e., households with minor children, experiencing homelessness, and/or experiencing domestic violence who do not meet another open preference category.)

Commissioner Braseth made a motion to approve the opening of the Housing Choice Voucher waiting list to preference households as described above. Commissioner Martin seconded the motion and it carried unanimously.

OTHER:

SPACE AND STAFFING

The HRA completed the move of the 8-person Rental Assistance team to the Family Service Center on November 1. Two staff who were officed at Gateway Gardens have returned to the main office. The three staff who were officed in the hallway and conference room have moved into offices. There are ten people at the main office, eight people at the Family Service Center, one staff person at the Prairie Horizons Townhomes office, and two staff at Houge Estates. There also are five maintenance staff without a fixed office.

Paul Green began on October 18, and Mohammad Shaheen Azizi on November 1. Both are Rental Assistance Specialists/Inspectors. On January 1, 2022, Jill Cossette will be promoted from Finance Specialist to Administrative Manager. We anticipate a staff retirement in Spring 2022 and will begin advertising in December or January for a full-time replacement to this part-time position.

COVID-19

Covid-19 is once again directly impacting the office. A fully vaccinated staff person is out with covid, and a staff member is out caring for a child with covid. Both are working remotely as they are able.

OFFICE HOURS

Staff is monitoring the traffic and telephone call volume and changes due to the office space changes. The Family Service Center hours have been expanded to Monday-Friday 8-4:30 by appointment and walk-ins Tuesdays from noon-5 p.m.; Wednesdays from 10 a.m.-2 p.m.; and Thursdays from 7 a.m.-1 p.m. The main office will have the same appointment only hours and have walk-in hours from 10 a.m.-2 p.m. every Wednesdays; 12-4:30 p.m. the first Monday of the month; and 8 a.m.-4:30 p.m. the first Tuesday, Wednesday, and Thursday of the month.


DECEMBER BOARD MEETING

In order for all board members to see the new office space, the December 21, 2021 Board meeting will be held at the Family Service Center in Moorhead. The HRA offices there are located on the second floor and the conference room has been found to be warmer than the conference room in Dilworth.

10:25 A.M. MEETING ADJOURNED:

A motion was made to adjourn the meeting at 10:25 a.m. by Commissioner Martin. The motion was seconded by Commissioner Braseth and carried unanimously.

Minutes
November 16, 2021
Clay County HRA


Tia Braseth, Secretary

12/21/21
Date

Streamlined Annual PHA Plan (HCV Only PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
--	---	---

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, including changes to these policies, and informs 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- income, very low- income, 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, 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, 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 housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																																						
A.1	<p>PHA Name: Clay County Housing & Redevelopment Authority PHA Code: MN164 PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2022</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) <u>742</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Participating PHAs</th> <th style="width: 10%;">PHA Code</th> <th style="width: 25%;">Program(s) in the Consortia</th> <th style="width: 20%;">Program(s) not in the Consortia</th> <th style="width: 20%;">No. of Units in Each Program</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>				Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	Lead HA:																													
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	<p>Revision of Existing PHA Plan Elements.</p> <p>a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Informal Review and Hearing Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification.</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</p>
B.2	New Activities. – Not Applicable

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.

Below are the goals described in the Clay County HRA's 2020-2024 Plan and the progress in meeting these goals:

1. Preserve existing supply of quality housing that is affordable to those earning 80% of AMI or less.
 - Preservation of naturally occurring affordable housing (multi-family and single family). Goal of 10 per year.
 - **Progress: MN164 rehabilitated 32 units of multifamily and 12 units of single family housing in 2020 and 2021.**
 - Maintain and rehabilitate units owned and managed by the Clay County HRA. Goal to maintain all 176 units and rehabilitate 20 of these units per year. **Progress: MN164 has secured funding to rehabilitate 40 units of HRA-owned Project-based Section 8 New Construction units that are under a HAP contract in 2022.**

2. Increasing supply of quality housing that is affordable to those earning 80% of AMI or less.
 - Subsidized units- Goal to consider project-basing HCV units as appropriate. **Progress: MN164 has not project-based additional HCV units at this time.**
 - Increased availability of rental assistance- Goal to increase by 20 units per year. **Progress: Goal met for 5-year period. The HRA has increased the number of HCV units by 220 since 2020 (149 additional Mainstream; 25 additional VASH; 30 additional TPV; 15 new EHV; and 1 new FYI). MN164 will continue to apply for additional vouchers as they become available to meet the needs of its residents.**
 - Providing Homeownership opportunities for low-income people – Goal to maintain Housing Choice Voucher Homeownership units. **Progress: MN164 has increased the number of HCV Homeownership units from 13 to 14 and has additional participants searching for units.**

3. End Homelessness in our Community – Goal to reduce homelessness by 5% per year. **Progress: MN164 has worked with the community to end veteran and unsheltered homelessness. Family and youth homelessness has been reduced to 52 households as of 9/2021. There are an additional 151 single adults experiencing homeless.**

4. Organizational Sustainability – Goal to stabilize and increase resources to provide needed services.

	<p>Progress: MN164 continues to diversify its funding sources and secured \$180,000 of ARPA funding for homeless and rehabilitation programs.</p> <p>5. Transfer the entire MN164 Public Housing Program to MN017, Moorhead Public Housing Agency. Progress: Goal met. MN164 successfully transferred its Public Housing Program to MN017.</p>
B.4	Capital Improvements. – Not Applicable
B.5	<p>Most Recent Fiscal Year Audit.</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>
C.	Other Document and/or Certification Requirements.
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" 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. The Clay County HRA RAB met on 11/9/2021 but had no comments to the PHA Plan.</p>
C.2	<p>Certification by State or Local Officials.</p> <p><i>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. See attached from both City of Moorhead and State of Minnesota</i></p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p><i>Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan. See attached.</i></p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</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>If yes, include Challenged Elements.</p>
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <p>Fair Housing Goal:</p>

Describe fair housing strategies and actions to achieve the goal

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

**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 3/31/2024

**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 January 1, 2022, 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 certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which 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 RAB (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 manner in which 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.
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.
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.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
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 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 on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 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.
 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 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.
 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 200.333 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 be available at all times and 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.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

CLAY COUNTY HOUSING & REDEVELOPMENT AUTHORITY MN164

PHA Name

PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2022

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

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

Name of Executive Director	Dara A. Lee	Name Board Chairman	Cecil Johnson
Signature	Date 11/16/2021	Signature	Date 11/16/2021