

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

OPEN COMMUNITIES ALLIANCE, <i>et al.</i> ,)	
)	
Plaintiff,)	
)	
v.)	Civ. Action No. 1:17-cv-02192
)	
BEN CARSON, <i>et al.</i> ,)	
)	
Defendants.)	

DECLARATION OF MARIANNE NAZZARO

I, Marianne Nazzaro, do declare as follows:

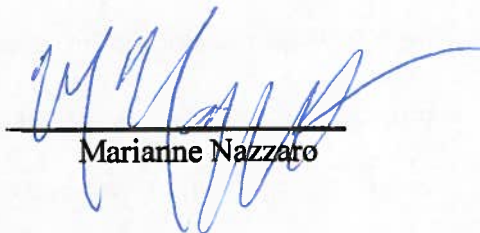
1. I am currently the Director of the Moving to Work (MTW) Demonstration Program, Office of Public and Indian Housing for the United States Department of Housing and Urban Development (“HUD”). I have been in this capacity since July 2015. I have worked for the Office of Public and Indian Housing since May 2006. As the Director of the MTW Demonstration Program, I have personal knowledge of how the demonstration program impacts other programs. I make the following statements based on my personal knowledge or information known to me in my capacity as the Director of the Moving to Work Demonstration Program.
2. MTW Public Housing Authorities (PHAs) administering the Housing Choice Voucher (HCV) program can exercise flexibility in regard to establishing rent in accordance with the terms of their respective MTW Agreement and approved Annual MTW Plan. Specifically, MTW PHAs have the authority to waive 24 C.F.R. § 982.503 and set alternative rent policies outside of the standard regulations governing the use of Fair Market Rents (FMRs), including those required to use Small Area FMRs (SAFMRs), in

setting payment standards with approval from HUD. As currently contemplated by HUD, if an MTW PHA is in the metropolitan area designated for the mandatory use of SAFMR but has waived 24 C.F.R. 982.503 and set an alternative rent through its Annual MTW Plan, the MTW PHA would not be required to use the SAFMR.

3. The Chicago Housing Authority (CHA) is an MTW PHA. Currently, CHA's HUD-approved Annual MTW Plan includes three implemented activities that would exempt CHA from mandatory use of the SAFMR even though CHA resides in a metropolitan area that has been designated as such. Therefore, the change from metropolitan-wide FMRs to SAFMRs would not impact any person who currently holds a housing voucher issued by CHA.

Executed on

November 27, 2017



Marianne Nazzaro