

# PHA Name : Houston

**PHA Code :** TX005

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 1/1/2024

**PHA Program Type:** Combined

**MTW Cohort Number:** Stepped and Tiered Rent

**MTW Supplement Submission Type:** Annual Submission

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

The Houston Housing Authority (HHA) hereby submits this Fiscal Year (FY) 2024 Moving to Work (MTW) Supplement component of the Annual PHA Plan. HUD designated HHA as an MTW agency in July 2021 as part of MTW "Cohort #2" which involves a six-year evaluation of alternative rent policies designed to increase resident self-sufficiency and reduce administrative burdens. As described herein, HHA will also implement an array of other allowable MTW activities above and beyond the alternative rent policies evaluation program.

As an MTW agency, HHA is required to prepare and publish an MTW Supplement each year that describes how HHA intends to utilize MTW flexibility to further the three MTW statutory objectives and advance the agency mission. This document is the third MTW Supplement submitted by HHA.

Over the coming year, HHA will utilize MTW flexibility to benefit residents and program participants and to support the agency mission and strategic objectives. Overall, HHA plans to utilize MTW flexibility to: (1) Deliver housing programs and services in a more efficient, streamlined manner that is accessible and transparent to our clients, and that reduces unnecessary administrative burdens on both clients and staff; (2) Expand housing options and choices to serve the unique, diverse needs of low-income residents of Houston by preserving the existing affordable housing portfolio, acquiring and/or building new mixed-income housing, promoting mobility to high opportunity neighborhoods and strengthening partnerships to create innovative, supportive housing options that serve special needs populations; and (3) Support residents in achieving economic self-sufficiency through an innovative alternative rent policies initiative, enhanced FSS program incentives, targeted literacy, education and job initiatives, affordable homeownership and other partnership initiatives utilizing housing as a platform to stabilize and strengthen families.

For FY 2024, implementation of the alternative rent policies evaluation initiative, for which initial enrollment began in FY 2023, will continue to be a priority project for HHA, including educating residents on program benefits, completing the enrollment of residents in the evaluation through random assignment and enhancing partnerships to support the initiative. A series of other HUD-approved MTW flexibilities will also be implemented including triennial recertifications applicable to households excluded from the alternative rent policy evaluation; more flexible Small Area Fair Market Rent payment standards to support voucher participant mobility; Project Based Voucher program and HQS inspection policies; and, use of funds for local, non-traditional development activities. For FY 2024, HHA is also proposing new MTW waivers that will provide lease-up, vacancy and damage payment incentives to HCV landlords to participate in the program; extend the grace period for over-income public housing households to remain in a subsidized public housing unit; and a modify the Family Self-Sufficiency (FSS) program to allow for extending the term of the FSS Contract of Participation to seven years. Additional MTW components will evolve over time and be proposed annually in accordance with the MTW Operations Notice. The policies described in the MTW Supplement may be modified based on further guidance from HUD. An overview of initiatives HHA plans to implement in FY 2024, organized by the three MTW statutory objectives, includes:

**Cost Effectiveness:** Starting in May 2023, HHA began to randomly assign new admissions and existing residents in both the Public Housing and HCV programs into either a "treatment" group which will have rents calculated using the MTW flat tiered rent model and be recertified every three years, or a "control" group which will continue to have their rents calculated and recertifications scheduled primarily using existing program rules except where MTW modifications may be allowed by HUD. This initiative will continue in FY 2024. For households who are excluded from rent reform (including elderly/disabled households, special purpose voucher holders and others as more fully described in the MTW Supplement), HHA will also implement triennial reexamination schedules, income exclusions, asset self-certification and other rent simplification policies that are expected to reduce cost and improve client service and satisfaction.

**Housing Choice:** HHA will continue to utilize MTW flexibility to support three broad objectives related to increasing housing choice for low-income households including initiatives to: (1) Expand the number of households who are able to move into high opportunity areas; (2) Preserve and expand the HHA affordable housing portfolio; and (3) Promote and expand innovations in supportive housing through PBV and local, non-traditional programs. Regarding mobility, HHA will continue to establish more flexible payment standards utilizing Small Area Fair Market Rents, pre-qualify units for HQS compliance, modify the frequency of HQS inspections and other initiatives to enhance owner acceptance and willingness to lease to voucher holders. To promote preservation and expansion, HHA may also engage in other HUD-approved MTW initiatives including establishing alternative PBV selection processes. Also as noted above, HHA is proposing additional MTW waivers to provide incentives for landlord participation in the voucher program in support of the objectives described above.

**Self-Sufficiency:** Implementation of the HHA alternative tiered rent model, triennial reexaminations will continue to be a focal point. HHA is also proposing to extend the grace period for an over-income public housing household to remain in a subsidized public housing unit and modify the FSS program to extend the term of the Contract of Participation to seven years. Other self-sufficiency initiatives will be evaluated over the coming year that build on the existing Section 3, FSS, MyGoals and Jobs Plus framework.

As discussed herein and within the Annual PHA Plan document, HHA also plans to use Housing Assistance Payments (HAP)

funds flexibly to implement authorized MTW activities in accordance with the Operations Notice and allow for flexible use of funding across Section 8 and 9 programs and for MTW local, non-traditional programs. HHA intends for HAP funding to be utilized for authorized purposes as approved by the HHA Board of Commissioners to implement approved MTW activities including, but not limited to: local non-traditional project-based and tenant-based programs; sponsor-based leasing programs with housing and supportive services; landlord leasing incentives for the voucher program; affordable homeownership downpayment assistance; education, job training and placement and other supportive services for HHA clients; and affordable housing development and preservation.

With the exception of MTW Activities 4.a.-4.c. and 10.d., all MTW activities and waivers described herein were approved by HUD in previous MTW Supplements.

**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)	Currently Implementing
b. Tiered Rent (HCV)	Currently Implementing
r. Elimination of Deduction(s) (PH)	Currently Implementing
s. Elimination of Deduction(s) (HCV)	Currently Implementing
v. Alternative Income Inclusions/Exclusions (PH)	Currently Implementing
w. Alternative Income Inclusions/Exclusions (HCV)	Currently Implementing
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Currently Implementing
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Currently Implementing
<b>6. Short-Term Assistance</b>	
<b>7. Term-Limited Assistance</b>	
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
<b>9. Project-Based Voucher Program Flexibilities</b>	
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
d.PH Modify or Eliminate the Contract of Participation (PH)	Plan to Implement in the Submission Year
<b>11. MTW Self-Sufficiency Program</b>	
<b>12. Work Requirement</b>	
<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)	Plan to Implement in the Submission Year
<b>14. Moving on Policy</b>	
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	
c. Housing Development Programs	Currently Implementing

**C. MTW Activities Plan that Houston Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.a. - Tiered Rent (PH)</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>
This activity was first approved as part of the FY 2022 MTW Supplement. HHA is part of MTW "Cohort #2" which involves

a six-year evaluation of alternative rent policies designed to increase resident self-sufficiency and reduce administrative burdens. Under this activity, HHA is implementing an income-based flat tiered rent model applicable to public housing households that are randomly selected to participate in the MTW alternative rent evaluation initiative and assigned to the "treatment" group.

The flat tiered rent model is based on gross household income with no deductions (except where hardship applies) that establishes a single rent for each \$2,000 income tier. At recertification, gross income is determined retrospectively. For new admissions, gross income is based on current income. Excepting the two lowest income tiers, the rent level for each tier is based on 28% of gross income as calculated at the lowest end of the tier. For the two lowest income tiers, a minimum rent of \$50 has been established. At the higher income end, rent for public housing is capped by the applicable flat rent or Low Income Housing Tax Credit rent. Utility allowances continue to apply, and households receive a utility reimbursement if applicable. Recertifications occur every 3 years. Income increases between regular recertifications do not result in rent increases. If household income decreases between regular recertifications, resulting in household income dropping to a lower tier, the household may request a hardship and have their rent be recalculated based on the lower tier, subject to the household meeting the requirements specified in the HHA Hardship Policy.

Beginning in early 2023, current and newly admitted non-elderly, non-disabled households who are not excluded from the evaluation are randomly assigned to either a treatment or control group. The treatment group has their rent calculated using the tiered rent method and are also subject to related policies including triennial examinations, elimination of deductions, asset self-certification and hardship policies. The control group continues to have their rent calculated in accordance with standard public housing regulations; however, subject to HUD approval, the control group will have MTW waivers applied related to asset self-certification as described in activity 3.c, Alternative Verification Hierarchy as described in the Agency-Specific Waiver and income exclusions described in activity 1.v. After a one-year enrollment period, all new admissions will have rents calculated in the same manner as the treatment group.

Random assignment under the alternative rent evaluation initiative applies only to non-elderly, non-disabled households. Other households excluded from the evaluation and, therefore, not subject to random assignment to either the treatment or control groups include the following, based on their status at the time of random assignment:

- Head, Co-Head, Spouse who are 56 years of age or older
- Households in the homeownership program
- Current FSS participants
- Current flat rent households
- Mixed eligibility families
- Households living in Jobs Plus developments
- Households receiving Earned Income Disregard (EID)
- Households who are not yet indicated as disabled according to HUD definition, but have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

The tiered rent activity is part of the overall alternative rent policy initiative that also incorporates triennial reexaminations, elimination of deductions, certain income exclusions and asset self-certification. Overall, HHA has defined the following goals: (1) provide incentives for economic self-sufficiency; (2) simplify program administration and reduce administrative burdens; (3) be transparent and easy to understand; (4) minimize the number of households who will experience a rent increase at enrollment and beyond; (5) be revenue neutral to the greatest extent possible; and, 6) be supportive of the

HHA overall vision and plan for MTW.

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

Cost effectiveness; Self-sufficiency

**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 only to selected family types

**Please select the family types subject to this MTW activity.**

Non-elderly, non-disabled families; Other – another specifically defined target population or populations.

**If Other Selected in Previous Question: Please describe this target population in the text box.**

Random assignment under the alternative rent evaluation initiative applies only to non-elderly, non-disabled households.

Other households excluded from the evaluation and, therefore, not subject to random assignment to either the treatment or control groups include the following, based on their status at the time of random assignment:

- Head, Co-Head, Spouse who are 56 years of age or older
- Households in the homeownership program
- Current FSS participants
- Current flat rent households
- Mixed eligibility families
- Households living in Jobs Plus developments
- Households receiving Earned Income Disregard (EID)
- Households who are not yet indicated as disabled according to HUD definition, but have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

**Does the MTW activity apply to all public housing developments?**

The MTW activity applies to all developments

**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.**

HHA conducted staff training, prepared resident notices and educational materials, and worked with its Information Technology vendor to prepare for the alternative rent policy initiative. Beginning in May 2023, HHA commenced the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). Enrollments will continue on a rolling basis into FY 2024.

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

No

**Please describe how the income bands are structured?**

Income bands are based on \$2,000 increments, with rent calculated at 28% of the low-point of the band. Deductions are eliminated except where hardship applies. Exceptions are the two lowest tiers, for which a minimum rent of \$50 applies. In addition, the tiers are capped at either the applicable flat rent or Low Income Housing Tax Credit (LIHTC) rent.

**Please upload the tiered rent policy table that shows the income bands.**

This document is attached.

**What is the income basis for assigning households to income bands?**

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

1.r. and/or 1.s. "elimination of deductions"; 1.v. and/or 1.w "alternative inclusions and exclusions"

**1.b. - Tiered Rent (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**

This activity was first approved as part of the FY 2022 MTW Supplement. HHA is part of MTW "Cohort #2" which involves a six-year evaluation of alternative rent policies designed to increase resident self-sufficiency and reduce administrative burdens. Under this activity, HHA is implementing an income-based flat tiered rent model applicable to Housing Choice Voucher households that are randomly selected to participate in the MTW alternative rent evaluation initiative and assigned to the "treatment" group.

The flat tiered rent model is based on gross household income with no deductions (except where hardship applies) that establishes a single rent for each \$2,000 income tier. At recertification, gross income is determined retrospectively. For new admissions, gross income is based on current income. Excepting the two lowest income tiers, the rent level for each tier is based on 28% of gross income as calculated at the lowest end of the tier. For the two lowest income tiers, a minimum rent of \$50 has been established. Tiered rents for the Housing Choice Voucher program are capped when total tenant payment equals the gross rent. Utility allowances continue to apply, and households receive a utility reimbursement if applicable. Recertifications occur every 3 years. Income increases between regular recertifications will not result in rent increases. If household income decreases between regular recertifications, resulting in household income dropping to a lower tier, the household may request a hardship and have their rent be recalculated based on the lower tier, subject to the household meeting the requirements specified in the HHA Hardship Policy.

Beginning in early 2023, current and newly admitted non-elderly, non-disabled households who are not excluded from the evaluation are randomly assigned to either a treatment or control group. The treatment group has their rent calculated using the tiered rent method and are also subject to related policies including triennial examinations, elimination of deductions, asset self-certification and hardship policies. The control group continues to have their rent calculated in accordance with standard HCV regulations; however, subject to HUD approval, the control group will have MTW waivers applied related to asset self-certification as described in activity 3.d, Alternative Verification Hierarchy as described in the Agency-Specific Waiver and income exclusions described in activity 1.w. After a one-year enrollment period, all new admissions will have rents calculated in the same manner as the treatment group.

Random assignment under the alternative rent evaluation initiative applies only to non-elderly, non-disabled households. Other households excluded from the evaluation and, therefore, not subject to random assignment to either the treatment or control groups include the following, based on their status at the time of random assignment:

- Head, Co-Head, Spouse who are 56 years of age or older
- Households in the homeownership program
- Current FSS participants
- Mixed eligibility families
- Households receiving Earned Income Disregard (EID)
- Households who are not yet indicated as disabled according to HUD definition, but have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

- HCV Zero HAP households
- Special purpose voucher households including: VASH, Mod Rehab (Certificate), Enhanced Voucher, Shelter Plus Care, Family Unification Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher
- Households in phase-in period under RAD protections
- Port-outs

The tiered rent activity is part of the alternative rent evaluation initiative that also incorporates triennial reexaminations, elimination of deductions, and asset self-certification. Overall, HHA has defined the following goals: (1) provide incentives for economic self-sufficiency; (2) simplify program administration and reduce administrative burdens; (3) be transparent and easy to understand; (4) minimize the number of households who will experience a rent increase at enrollment and beyond; (5) be revenue neutral to the greatest extent possible; and, 6) be supportive of the HHA overall vision and plan for MTW.

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

Cost effectiveness; Self-sufficiency

**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 only to selected family types

**Please select the family types subject to this MTW activity.**

Non-elderly, non-disabled families; Other – another specifically defined target population or populations.

**If Other Selected in Previous Question: Please describe this target population in the text box.**

Random assignment under the alternative rent evaluation initiative applies only to non-elderly, non-disabled households.

Other households excluded from the evaluation and, therefore, not subject to random assignment to either the treatment or control groups include the following, based on their status at the time of random assignment:

- Head, Co-Head, Spouse who are 56 years of age or older
- Households in the homeownership program
- Current FSS participants
- Mixed eligibility families
- Households receiving Earned Income Disregard (EID)
- Households who are not yet indicated as disabled according to HUD definition, but have been approved to receive



SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

- HCV Zero HAP households
- Special purpose voucher households including: VASH, Mod Rehab (Certificate), Enhanced Voucher, Shelter Plus Care, Family Unification Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher
- Households in phase-in period under RAD protections
- Port-outs

**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.**

HHA conducted staff training, prepared resident notices and educational materials, and worked with its Information Technology vendor to prepare for the alternative rent policy initiative. Beginning in May 2023, HHA commenced the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). Enrollments will continue on a rolling basis into FY 2024.

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

No

**Please describe how the income bands are structured.**

Income bands are based on \$2,000 increments, with rent calculated at 28% of the low-point of the band. Deductions are eliminated except where hardship applies. Exceptions are the two lowest tiers, for which a minimum rent of \$50 applies. In addition, the tiers are capped when total tenant payment equals the gross rent.

**Please upload the tiered rent policy table that shows the income bands.**

This document is attached.

**What is the income basis for assigning households to income bands?**

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) 1.r. and/or 1.s. "elimination of deductions"; 1.v. and/or 1.w "alternative inclusions and exclusions"

**1.r. - Elimination of Deduction(s) (PH)**

**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**

This activity was first approved as part of the FY 2022 MTW Supplement. Under this activity, HHA eliminates the dependent and unreimbursed child care deductions in conjunction with implementation of an income-based flat tiered rent model applicable to public housing households that are randomly selected to participate in the MTW alternative rent evaluation initiative and assigned to the "treatment" group. See Activity 1A.

The flat tiered rent model is based on gross household income with no deductions (except where hardship applies) that establishes a single rent for each \$2,000 income tier. Excepting the two lowest income tiers, the rent level for each tier is based on 28% of gross income as calculated at the lowest end of the tier. For the two lowest income tiers, a minimum rent of \$50 has been established. At the higher income end, rent for public housing is capped by the applicable flat rent or Low Income Housing Tax Credit rent. Utility allowances continue to apply, and households receive a utility reimbursement if applicable.

HHA has established a Hardship Policy through which HHA will grant a hardship for child care expenses to eligible households with child care expenses of \$2,000 or more. See Hardship Policy for additional details.

Beginning in early 2023, current and newly admitted non-elderly, non-disabled households who are not excluded from the evaluation are randomly assigned to either a treatment or control group. The treatment group has their rent calculated using the tiered rent method and are also subject to related policies including triennial examinations, elimination of deductions, and hardship policies. The control group continues to have their rent calculated in accordance with standard public housing regulations; however, subject to HUD approval, the control group will have MTW waivers applied related to asset self-certification as described in activity 3.c, Alternative Verification Hierarchy as described in the Agency-Specific Waiver and income exclusions described in activity 1.v. .

Random assignment under the alternative rent evaluation initiative applies only to non-elderly, non-disabled households. Other households excluded from the evaluation and, therefore, not subject to random assignment to either the treatment or control groups include the following, based on their status at the time of random assignment:

- Head, Co-Head, Spouse greater than 56 years of age
- Households in the homeownership program
- Current FSS participants
- Current flat rent households
- Mixed eligibility families
- Households living in Jobs Plus developments
- Households receiving Earned Income Disregard (EID)
- Households who are not yet indicated as disabled according to HUD definition, but have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

The elimination of deductions activity is part of the overall alternative rent evaluation initiative that also incorporates tiered rents, triennial reexaminations, and asset self-certification. Overall, HHA has defined the following goals for this and related activities: (1) provide incentives for economic self-sufficiency; (2) simplify program administration and reduce administrative burdens; (3) be transparent and easy to understand; (4) minimize the number of households who will experience a rent increase at enrollment and beyond; (5) be revenue neutral to the greatest extent possible; and, (6) be supportive of the HHA overall vision and plan for MTW.

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

Cost effectiveness; Self-sufficiency

**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 only to selected family types

**Please select the family types subject to this MTW activity.**

Non-elderly, non-disabled families; Other – another specifically defined target population or populations.

**If Other Selected in Previous Question: Please describe this target population in the text box.**

Random assignment under the alternative rent evaluation initiative applies only to non-elderly, non-disabled households.

Other households excluded from the evaluation and, therefore, not subject to random assignment to either the treatment or control groups include the following, based on their status at the time of random assignment:

- Head, Co-Head, Spouse greater than 56 years of age
- Households in the homeownership program
- Current FSS participants
- Current flat rent households
- Mixed eligibility families
- Households living in Jobs Plus developments
- Households receiving Earned Income Disregard (EID)
- Households who are not yet indicated as disabled according to HUD definition, but have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status).

**Does the MTW activity apply to all public housing developments?**

The MTW activity applies to all developments

**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.**

HHA conducted staff training, prepared resident notices and educational materials, and worked with its Information Technology vendor to prepare for the alternative rent policy initiative. Beginning in May 2023, HHA commenced the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). Enrollments will continue on a rolling basis into FY 2024.

**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?**

Provided Already

**Which deduction(s) will be eliminated, modified, or added?**

Dependent allowance; Unreimbursed childcare costs

### 1.s. - Elimination of Deduction(s) (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**

This activity was first approved as part of the FY 2022 MTW Supplement. Under this activity, HHA eliminates dependent and unreimbursed childcare deductions in conjunction with implementation of an income-based flat tiered rent model applicable to Housing Choice Voucher program households that are randomly selected to participate in the MTW alternative rent evaluation initiative and assigned to the "treatment" group. See Activity 1B.

The flat tiered rent model is based on gross household income with no deductions (except where hardship applies) that establishes a single rent for each \$2,000 income tier. Excepting the two lowest income tiers, the rent level for each tier is based on 28% of gross income as calculated at the lowest end of the tier. For the two lowest income tiers, a minimum rent of \$50 has been established. At the higher income end, rent is capped when total tenant payment equals the gross rent. Utility allowances continue to apply, and households receive a utility reimbursement if applicable.

HHA has established a Hardship Policy under which HHA will grant a hardship for child care expenses to eligible households with child care expenses of \$2,000 or more. See Hardship Policy for additional details.

Beginning in early 2023, current and newly admitted non-elderly, non-disabled households who are not excluded from the evaluation are randomly assigned to either a treatment or control group. The treatment group has their rent calculated using the tiered rent method and are also subject to related policies including triennial examinations, elimination of deductions, and hardship policies. The control group continues to have their rent calculated in accordance with standard Housing Choice Voucher program regulations; however, subject to HUD approval, the control group has MTW waivers applied related to asset self-certification as described in activity 3.d, Alternative Verification Hierarchy as described in the Agency-Specific Waiver and income exclusions described in activity 1.w.

Random assignment under the alternative rent evaluation initiative applies only to non-elderly, non-disabled households. Other households excluded from the evaluation and, therefore, not subject to random assignment to either the treatment or control groups include the following, based on their status at the time of random assignment:

- Head, Co-Head, Spouse who are 56 years of age or older
- Households in the homeownership program
- Current FSS participants
- Mixed eligibility families
- Households receiving Earned Income Disregard (EID)
- Households who are not yet indicated as disabled according to HUD definition, but have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)
- HCV Zero HAP households
- Special purpose voucher households including: VASH, Mod Rehab (Certificate), Enhanced Voucher, Shelter Plus Care, Family Unification Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher
- Households in phase-in period under RAD protections
- Port-outs

The elimination of deductions activity is part of the overall alternative rent evaluation initiative that also incorporates tiered rents, triennial reexaminations and asset self-certification. Overall, HHA has defined the following goals for this and related activities: (1) provide incentives for economic self-sufficiency; (2) simplify program administration and reduce administrative burdens; (3) be transparent and easy to understand; (4) minimize the number of households who will experience a rent increase at enrollment and beyond; (5) be revenue neutral to the greatest extent possible; and, 6) be supportive of the HHA overall vision and plan for MTW.

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

Cost effectiveness; Self-sufficiency

#### **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 only to selected family types

**Please select the family types subject to this MTW activity.**

Non-elderly, non-disabled families; Other – another specifically defined target population or populations.

**If Other Selected in Previous Question: Please describe this target population in the text box.**

Random assignment under the alternative rent evaluation initiative applies only to non-elderly, non-disabled households.

Other households excluded from the evaluation and, therefore, not subject to random assignment to either the treatment or control groups include the following, based on their status at the time of random assignment:

- Head, Co-Head, Spouse who are 56 years of age or older
- Households in the homeownership program
- Current FSS participants
- Mixed eligibility families
- Households receiving Earned Income Disregard (EID)
- Households who are not yet indicated as disabled according to HUD definition, but have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)
- HCV Zero HAP households
- Special purpose voucher households including: VASH, Mod Rehab (Certificate), Enhanced Voucher, Shelter Plus Care, Family Unification Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher
- Households in phase-in period under RAD protections
- Port-outs

**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.**

The MTW activity applies to both tenant-based and project-based voucher participants that are randomly selected per the description above.

**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.**

HHA conducted staff training, prepared resident notices and educational materials, and worked with its Information Technology vendor to prepare for the alternative rent policy initiative. Beginning in May 2023, HHA commenced the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). Enrollments will continue on a rolling basis into FY 2024.

**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?**

Provided Already

**Which deduction(s) will be eliminated, modified, or added?**

Dependent allowance; Unreimbursed childcare costs

**1.v. - Alternative Income Inclusions/Exclusions (PH)**

**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**

This activity was first approved as part of the FY 2022 MTW Supplement. Under this activity, HHA excludes the following income when calculating tenant rent: 1) Earned income from full-time students; 2) Adoption assistance payments; and, 3) Asset income for up to \$50,000 in assets. This income exclusion applies to all public housing households. HHA goals for this activity include providing incentives for economic self-sufficiency, simplifying program administration and reducing administrative burdens.

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

Cost effectiveness; Self-sufficiency

**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.**

This activity is related to the HHA tiered rent evaluation initiative discussed in MTW activity 1a; however, it will also be applied to all public housing households including those not part of the rent study. To date, HHA has focused on applying these exclusions as part of the rent study random assignment process for the alternative tiered rent study. In 2023, HHA conducted staff training, prepared resident notices and educational materials, and worked with its Information Technology vendor to prepare for the alternative rent policy initiative. Beginning in May 2023, HHA commenced the enrollment and

random selection process in consultation with HUD and MDRC (program evaluator). Enrollments will continue on a rolling basis into FY 2024. Roll out to households excluded from participation in the alternative rent policy study is also projected to begin in FY 2024.

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

No

**What inclusions or exclusions will be eliminated, modified, or added?**

Income to be excluded includes: 1) Earned income from full-time students; 2)Adoption assistance payments; and, 3)Asset income for up to \$50,000 in assets.

**1.w. - Alternative Income Inclusions/Exclusions (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**

This activity was first approved as part of the FY 2022 MTW Supplement. It is related to the HHA tiered rent evaluation initiative discussed in MTW activity 1b; however, it will also apply to all HCV households that are not part of the rent study. To date, HHA has focused on applying these exclusions as part of the rent study random assignment process for the alternative tiered rent study.

Under this activity, HHA excludes the following income when calculating tenant rent: 1) Earned income from full-time students; 2) Adoption assistance payments; and, 3) Asset income for up to \$50,000 in assets. This income exclusion will apply to all Housing Choice Voucher (HCV) program households. HHA goals for this activity include providing incentives for economic self-sufficiency, simplifying program administration and reducing administrative burdens.

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

Cost effectiveness; Self-sufficiency

**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.**

This activity is related to the HHA tiered rent evaluation initiative discussed in MTW activity 1b; however, it will also be applied to all HCV households including those not part of the rent study. To date, HHA has focused on applying these exclusions as part of the rent study random assignment process for the alternative tiered rent study. In 2023, HHA conducted staff training, prepared resident notices and educational materials, and worked with its Information Technology vendor to prepare for the alternative rent policy initiative. Beginning in May 2023, HHA commenced the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). Enrollments will continue on a rolling basis into FY 2024. Roll out to households excluded from participation in the alternative rent policy study is also projected to begin in FY 2024.

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

No

**What inclusions or exclusions will be eliminated, modified, or added?**

Income to be excluded includes: 1) Earned income from full-time students; 2)Adoption assistance payments; and, 3)Asset income for up to \$50,000 in assets.

**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**

This activity was first approved as part of the FY 2022 MTW Supplement. Under this activity, HHA utilizes Small Area Fair Market Rents (SAFMR) to establish payment standards for the Housing Choice Voucher program. In lieu of establishing a unique payment standard for each zip code area, HHA may establish payment standards between 80-150% of the SAFMR for one or more groups of zip code areas. Current payment standards are applied when contract rent increases occur between regular triennial recertifications if the new gross rent exceeds the prior payment standard. HHA received HUD approval in 2021 to implement SAFMRs citywide. Thus, the primary effect of this MTW activity is to allow HHA to establish payment standards between 80-150% of SAFMR, compared to the standard 90-110%. In addition, it supports HHA efforts to reduce housing cost burdens by applying the then current payment standard if rent increases to owners approved by HHA between regular recertifications result in an increase in the gross rent above the payment standard that was applicable at the prior recertification. HHA currently utilizes SAFMRs to establish payment standards for the tenant-based program only. Citywide FMRs are currently utilized for the Project Based Voucher program. HHA goals for this MTW activity are to support housing choice and mobility and reduce housing cost burdens by establishing payment standards that effectively will expand housing options, particularly in higher opportunity areas. HHA has established a Hardship Policy to minimize the impact on participants when the payment standard decreases.

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

Housing choice

**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.**

HHA utilized the flexibility under this waiver to establish higher 2023 HCV payment standards for the tenant-based voucher program. HHA anticipates that the higher payment standards will support increased utilization and a wider range of housing choices for voucher participants.

**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?**

Provided Already

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

HHA currently has established five groups of zip codes. Within each group, the payment standard for each individual zip code area must fall within the 80-150% basic range allowed under this MTW waiver. Payment standards and groupings may vary from year to year.

**2.d. - Rent Reasonableness – Third-Party Requirement (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**

This activity was first approved as part of the FY 2023 MTW Supplement. It authorizes HHA to perform rent reasonableness determinations on Project Based Voucher (PBV) units that it owns, manages and/or controls, and waives certain provisions of the Housing Act of 1937 along with HUD regulations at 24 CFR 982.352(b) and 24 CFR 983.303. Essentially, it allows HHA to conduct rent reasonableness determinations on PBV units that it owns, manages and/or controls in accordance with other applicable HUD regulations and consistent with the way the agency conducts rent reasonableness for all other units leased under the HCV program, i.e. HHA will determine that rents charged for these



units are reasonable when compared to similar unassisted units in the market area. As required under the MTW Operations Notice, HHA has established a quality assurance method to ensure impartiality. This activity supports HHA efforts to ensure cost effective administration and to expand housing choices and opportunities for voucher program participants.

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

Cost effectiveness; 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 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.**

Applies to PBV units that HHA owns, manages or controls.

**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.**

HHA has begun to plan for this initiative and projects that it will conduct rent reasonableness determinations for PBV units that it owns, manages or controls over the course of the next fiscal year.

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

No

**Please explain or upload a description of the quality assurance method.**

See attached description of the HHA Quality Assurance method. Note that this document was originally submitted as part of the FY 2022 MTW Supplement.

This document is attached.

**Please explain or upload a description of the rent reasonableness determination method.**

HHA has attached excerpts for the current HCV Administrative Plan related to the rent reasonableness determination method. See also attached Quality Assurance method description. Note that this document was originally submitted as part of the FY 2022 MTW Supplement.

This document is attached.

**3.a. - Alternative Reexamination Schedule for Households (PH)**

**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**

This activity was first approved as part of the FY 2022 MTW Supplement. It allows HHA to establish an alternative reexamination schedule wherein regular recertifications are conducted at least once every three years ("triennial" recertifications). This policy applies to all public housing households except for those households randomly selected and assigned to the "control" group pursuant to the MTW Cohort #2 evaluation described in MTW Activity 1.a. who continue to have annual recertifications and are eligible for interim recertifications according to standard HUD public housing regulations and existing HHA policies.

Households randomly selected and assigned to the "treatment" group pursuant to the MTW Cohort #2 evaluation are recertified on a triennial basis with no interim recertifications (unless caused by changes to household composition); however, these households may be eligible to apply for an income decrease or other hardship pursuant to the HHA Hardship Policy. HUD approved the Safe Harbor Waiver in conjunction with implementing triennial recertifications for this group.

All other public housing households, i.e. those households excluded from the random assignment process pursuant to the MTW Cohort #2 evaluation, will be recertified on a triennial basis and will also be able to apply for interim recertifications according to existing HHA interim policies which do not limit the number of recertifications. For this group of households, HHA will phase in triennial recertifications over a three year period beginning in 2023-24, i.e. approximately one-third of excluded households will be converted to triennial recertifications each year over a three-year period.

HHA goals for this activity include providing incentives for economic self-sufficiency, simplifying program administration and reducing administrative burdens.

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

Cost effectiveness; Self-sufficiency

**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.**

This activity is related to the HHA tiered rent evaluation initiative discussed in MTW activity 1a; however, it will also be applied to all public housing households including those not part of the rent study. To date, HHA has focused on the rent study random assignment process for the alternative tiered rent study. However, HHA plans to begin roll-out of triennial recertifications for households excluded from the rent study in the 2023-24 timeframe. Also in 2023, HHA conducted staff training, prepared resident notices and educational materials, and worked with its Information Technology vendor to prepare for the alternative rent policy and triennial reexam initiatives. Beginning in May 2023, HHA commenced the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). Enrollments will continue on a rolling basis into FY 2024

**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?**

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing**

**this MTW activity.**

The waiver was required to implement components of the alternative MTW rent evaluation initiative.

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

Provided Already

**What is the recertification schedule?**

Once every three 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.**

Households randomly selected and assigned to the "treatment" group pursuant to the MTW Cohort #2 evaluation are recertified on a triennial basis with no interim recertifications (unless caused by changes to household composition); however, these households may be eligible to apply for an income decrease or other hardship pursuant to the HHA Hardship Policy. HUD approved the Safe Harbor Waiver in conjunction with implementing triennial recertifications for this group.

All other public housing households, i.e. those households excluded from the random assignment process pursuant to the MTW Cohort #2 evaluation, will be recertified on a triennial basis and will also be able to apply for interim recertifications according to existing HHA interim policies which do not limit the number of recertifications.

**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**

This activity was first approved as part of the FY 2022 MTW Supplement. It allows HHA to establish an alternative reexamination schedule wherein regular recertifications are conducted at least once every three years ("triennial" recertifications). This policy applies to all HCV households except for those households randomly selected and assigned to the "control" group pursuant to the MTW Cohort #2 evaluation described in MTW Activity 1.b who continue to have annual recertifications and are eligible for interim recertifications according to standard HUD HCV regulations and existing HHA policies.

Households randomly selected and assigned to the "treatment" group pursuant to the MTW Cohort #2 evaluation are recertified on a triennial basis with no interim recertifications (unless caused by changes to household composition); however, these households may be eligible to apply for an income decrease or other hardship pursuant to HHA's Hardship Policy. HUD approved HHA's Safe Harbor Waiver in conjunction with implementing triennial recertifications for this group.

All other HCV households, i.e. those households excluded from the random assignment process pursuant to the MTW Cohort #2 evaluation, will be recertified on a triennial basis and will also be able to apply for interim recertifications according to existing HHA interim policies which do not limit the number of recertifications. For this group of households, HHA will phase in triennial recertifications over a three year period beginning in 2023, i.e. approximately one-third of excluded households will be converted to triennial recertifications each year over a three-year period.

HHA goals for this activity include providing incentives for economic self-sufficiency, simplifying program administration and reducing administrative burdens.

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

Cost effectiveness; Self-sufficiency

**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.**

This activity is related to the HHA tiered rent evaluation initiative discussed in MTW activity 1b; however, it will also be applied to all HCV households including those not part of the rent study. To date, HHA has focused on the rent study random assignment process for the alternative tiered rent study. However, HHA plans to begin roll-out of triennial recertifications for households excluded from the rent study in the 2023-24 time period. Also in 2023, HHA conducted staff training, prepared resident notices and educational materials, and worked with its Information Technology vendor to prepare for the alternative rent policy and triennial reexam initiatives. Beginning in May 2023, HHA commenced the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). Enrollments will continue on a rolling basis into FY 2024

**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?**

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

The waiver is required to implement components of the alternative MTW rent evaluation initiative.

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

Provided Already

**What is the recertification schedule?**

Once every three 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.**

Households randomly selected and assigned to the "treatment" group pursuant to the MTW Cohort #2 evaluation will be recertified on a triennial basis with no interim recertifications (except for changes to household composition); however, these households will be eligible to apply for an income decrease or other hardship pursuant to the Hardship Policy described in the MTW Supplement. HUD approved the Safe Harbor Waiver request for this group of households.

All other HCV households, i.e. those households excluded from the random assignment process pursuant to the MTW Cohort #2 evaluation, will be recertified on a triennial basis and will also be able to apply for interim recertifications according to existing HUD regulations and HHA HCV policies which do not limit the number of interim recertifications. For this group of households, HHA will phase in triennial recertifications over a three year period beginning in 2023-24, i.e. approximately one-third of excluded households will be converted to triennial recertifications each year over a three-year period.

<b>3.c. - Self-Certification of Assets (PH)</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>This activity was first approved as part of the FY 2022 MTW Supplement. Under this activity, all public housing households are able to self-certify assets at admission or recertification provided that the asset value does not exceed \$50,000. This activity aligns with the Cohort #2 alternative rent evaluation and other process simplification initiatives including triennial recertifications. The agency goal for this activity is to simplify administration and reduce administrative burden.</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>Neutral (no cost implications)</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 to all assisted households</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>This activity is related to the HHA tiered rent evaluation initiative discussed in MTW activity 1a; however, it will also be applied to all public housing households including those not part of the rent study. To date, HHA has focused on implementing asset self-certification as part of the rent study random assignment process for the alternative tiered rent study. However, HHA plans to begin roll-out of asset self-certification for households excluded from the rent study in the 2023-24 time frame.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Please state the dollar threshold for the self-certification of assets.</b></p> <p>\$50,000.</p>

<b>3.d. - Self-Certification of Assets (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>This activity was first approved as part of the FY 2022 MTW Supplement. Under this activity, all HCV program households are able to self-certify assets at admission or recertification provided that the asset value does not exceed \$50,000. This activity aligns with the Cohort #2 alternative rent evaluation and other process simplification initiatives including triennial recertifications. The agency goal for this activity is to simplify administration and reduce administrative burden.</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>Neutral (no cost implications)</p>

**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.**

This activity is related to the HHA tiered rent evaluation initiative discussed in MTW activity 1b; however, it will also be applied to all HCV households including those not part of the rent study. To date, HHA has focused on implementing asset self-certification as part of the random assignment and enrollment process for the alternative tiered rent study. HHA plans to begin roll-out of asset self-certification for households excluded from the rent study in the 2023-24 time period.

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

No

**Please state the dollar threshold for the self-certification of assets.**

\$50,000.

#### **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**

Under this activity, HHA will provide vacancy loss payments to eligible landlords participating in the HCV tenant-based program in order to incentive continued participation in the HCV program. Landlords will be eligible for these payments if the unit is currently under a Housing Assistance Payments (HAP) contract, the current voucher participant has moved out, the owner has agreed to lease to a new voucher participant and the housing unit will be vacant for a brief period of time between tenancies. Payments to landlords will not exceed one month of the contract rent, and will be paid to the owner when the next HAP contract is executed between HHA and the landlord. HHA will update its Administrative Plan to reflect this activity.

**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 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.**

Not applicable. This is a newly proposed activity.

**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?**

One month contract rent.

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

0

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

\$0

#### **4.b. - Damage Claims (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**

Under this activity, HHA will provide damage claim payments to eligible landlords participating in the HCV tenant-based program in order to incentive continued participation in the HCV program. Landlords will be eligible for damage claim payments if the unit is currently under a Housing Assistance Payments (HAP) contract, the current voucher participant has moved out leaving tenant-caused damages to the housing unit, and the owner has agreed to lease to a new voucher participant. Damage claim payments for tenant-caused damages will not exceed the lesser of the cost of the repairs or two months of contract rent minus the participant security deposit if applicable. The voucher participant security deposit if applicable must first be used to cover damages. Damage claim payments to landlords will be paid to the owner when the next HAP contract is executed between HHA and the landlord. HHA will update its Administrative Plan to reflect this damage claim policy. This activity supports HHA's efforts to expand housing choice for voucher program participants.

**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 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
<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> Not applicable. This is a newly proposed activity.
<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> Two months contract rent less any HCV participant-paid security deposit. The amount of damage claims will not exceed the lesser of the cost of repairs necessitated to repair tenant-caused damages or two months contract rent (less any participant-paid security deposit).
<b>How many payments were issued under this policy in the most recently completed PHA fiscal year?</b> 0
<b>What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?</b> \$0

<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> Under this activity, HHA will provide leasing incentive payments to encourage landlords with housing units in high opportunity areas and other areas throughout the HHA jurisdiction where vouchers are difficult to use as identified in the HHA Administrative Plan to participate in the Housing Choice Voucher (HCV) tenant-based program. Payments to landlords will not exceed one month of the contract rent, and will be paid to the owner when the HAP contract is executed between HHA and the landlord. HHA will update its Administrative Plan to reflect this leasing incentive activity. Leasing incentives support HHA efforts to expand housing choices for tenant-based voucher holders.
<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.**

Not applicable. This is a newly proposed activity.

**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?)**

Certain types of units only

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

One month of the contract rent.

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

0

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

\$0

#### **5.a. - Pre-Qualifying Unit Inspections (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**

This activity was first approved as part of the FY 2022 MTW Supplement. It allows HHA to conduct pre-qualifying unit inspections to determine if the unit meets HUD Housing Quality Standards in both the tenant-based and Project Based Voucher programs, provided that the pre-qualifying unit inspection must be done within 90 days of the participant occupying the unit. The program participant may request an interim inspection by contacting HHA at any time in accordance with current agency policies. HUD HQS standards at 24 CFR 982.401 apply to pre-qualifying inspections. This activity supports HHA goals to streamline program administration and increase housing choice for HCV program participants.

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

Cost effectiveness; 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.**

In FY 2023, HHA began planning for use of pre-qualifying inspections. Implementation is projected to take place over the 2023-24 time frame.

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

No

**How long is the pre-inspection valid for?**

The pre-inspection is valid for 90 days.

### **5.c. - Third-Party Requirement (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**

This activity was first approved as part of the FY 2022 MTW Supplement. It allows HHA to conduct HQS inspections of Project Based Voucher (PBV) units that it owns, manages and/or controls as an alternative to having inspections conducted by a third party. All such inspections are conducted using HQS standards found at 24 CFR 982.401. To ensure the consistent and uniform application of HQS standards, HHA supervisory staff will conduct quality control inspections on a random sample of units in accordance with the Inspection Quality Assurance Method developed by HHA. Program participants may request an interim inspection by contacting HHA in accordance with the policies described in the Administrative Plan. If requested by HUD, HHA will obtain the services of a third-party entity to determine if HHA-owned units pass HQS. This activity helps support the HHA goal to streamline program administration and promote timely lease-up of PBV units.

**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.**

Applies to PBV units that HHA owns, manages or controls.

**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.**

HHA has begun to plan for this initiative and projects that it will conduct HQS inspections for PBV units that it owns, manages or controls over the course of the next fiscal year.

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

No

**Please explain or upload the description of the quality assurance method:**

Following will explain the quality assurance method

See attached HHA Quality Assurance method which was originally submitted as part of the prior year MTW Supplement.

This document is attached.

#### **5.d. - Alternative Inspection Schedule (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**

This activity was first approved as part of the FY 2022 MTW Supplement. It allows HHA to implement an alternative inspection schedule for HCV units based on agency assessment of the age, property/unit condition, quality of property management and/or other relevant factors for individual units or buildings under a Housing Assistance Payments contract. All units must be inspected and pass HQS at initial occupancy. The alternative inspection will require that all units meet HUD Housing Quality Standards (HQS) and be inspected at least once every three years. All program participants will be able to request an interim inspection in accordance with HHA Administrative Plan policies. HUD shall be able to conduct or direct HHA to conduct inspections at any time for health, safety and/or accessibility purposes. This activity supports the goals of reducing administrative burden and streamlining program administration.

**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 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.**

HHA began to plan for implementation of this waiver in FY 2023 with a projected roll out over the 2023-24 time frame.

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

No

**9.b. - Increase PBV Project Cap (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**

This activity was first approved as part of the FY 2022 MTW Supplement. It allows HHA to eliminate or raise the existing cap on the number of units within a project and allow up to 100% of units in a project to be placed under a PBV Housing Assistance Payments contract. HHA may eliminate or raise the project cap for those PBV projects that the agency determines to be consistent with the goal of increasing housing choice for Housing Choice Voucher program participants. HHA may eliminate or raise the project cap for projects located in high opportunity areas, City-designated revitalization areas, in conjunction with HHA-sponsored development activities and for other factors as determined by HHA. HHA will continue to be subject to the applicable provisions of PIH Notice 2013-28 or successor notices. This activity supports the goal of increasing housing choice.

**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.**

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.**

HHA may eliminate or raise the project cap for PBV projects located in high opportunity areas, City-designated revitalization areas, in conjunction with HHA-sponsored development activities and for other factors as determined by HHA.

**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.**

HHA will implement this waiver as needed in response to future PBV proposals.

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

No

**9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (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**

This activity was first approved as part of the FY 2022 MTW Supplement. It allows HHA to eliminate the selection process in the award of Project Based Vouchers to properties owned by HHA that are not public housing without engaging in an initiative to improve, develop or replace a public housing property or site. HHA may award PBVs to projects meeting this criteria based on approval by the HHA Board of Commissioners and provided that: 1) A subsidy layering review is performed where required by regulation; 2) HHA completed site selection requirements; 3) HQS inspections shall be performed by an independent entity (unless waived pursuant to an MTW waiver); and, 4) The property is owned by a single-asset entity of HHA in conformance with HUD PIH Notice 2017-21 or successor notice. HHA shall continue to be subject where applicable to HUD PIH Notice 2013-27 or successor notice. The HHA goals for this activity are to increase housing choice and to streamline and make operations more cost effective.

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

Cost effectiveness; 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 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.**

Applies to PBV awards for properties owned by HHA that are not public housing.

**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.**

HHA plans to implement this waiver for qualified projects in the future.

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

No

**10.d.PH - Modify or Eliminate the Contract of Participation (PH)**

**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**

Under this activity, HHA will modify its Family Self-Sufficiency (FSS) program to allow for the participant Contract of Participation (COP) to have a term of up to seven (7) years. Based on FSS program experience, this extended term of participation will help facilitate the accomplishment of participant self-sufficiency goals. HHA will conform to all applicable safe harbor guidelines in the MTW Operations Notice including reviewing FSS program guidance; executing a COP with

each FSS participant; not making FSS participation mandatory for any participant; and, all other safe harbor requirements. This activity will support HHA efforts to promote economic self-sufficiency initiatives among residents and HCV program participants.

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

Self-sufficiency

**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.**

Not applicable. This is a newly proposed activity.

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

No

No document is attached.

**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?**

No

No document is attached.

**13. - How many months will households be able to remain in a unit while over income? (PH)**

**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**

Under this newly proposed activity, HHA will extend the grace period for which a public housing household can be over-income while remaining in a subsidized public housing unit to three years (36 months). This extension of the grace period will provide incentives for HHA residents to make economic progress and move towards economic self-sufficiency. HHA will comply with all required safe harbor standards as defined in the Operations Notice including: 1) The over-income limit defined by HUD is set at 120% of Area Median Income; 2) the grace period for an over-income household to remain in a subsidized public housing unit is three years; 3) HHA will inform households of their over-income status no less than one year prior to the end of the grace period; and, 4) At the end of the grace period, HHA will charge the household an alternative monthly rent applicable to over-income households in conformance with applicable HUD HOTMA requirements and the HHA Administrative Plan. This activity contributes to HHA initiatives to promote economic self-sufficiency of public housing residents and also supports Section 3-related resident business goals.

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

Self-sufficiency

**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.**

Not applicable. This is a newly proposed activity for FY 2024.

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

No

**How many months will households be able to remain in a unit while over income?**

36

**17.c. - Housing Development Programs**

**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**

This activity was first approved as part of the FY 2022 MTW Supplement. It allows HHA to utilize MTW funding to acquire, renovate and/or build affordable housing units that are not public housing for low-income families and that meet HUD requirements for MTW "local, non-traditional housing" as defined in HUD PIH Notice 2011-45 or successor notices. HHA may utilize this activity to provide gap financing (grants or loans) to affordable housing developments including, but not limited to, PBV developments, Low Income Housing Tax Credit developments and/or other eligible development activities, subject to approval by the HHA Board of Commissioners. HHA shall not expend more than 10% of its Housing Assistance Payments budget on local, non-traditional activities including this housing development activity. In implementing this activity, HHA shall: 1) Ensure that families assisted meet the HUD definition of "low-income"; 2) Comply with PIH Notice 2011-45 as applicable; 3) Comply with Section 30 of the US Housing Act of 1937; and, 4) Competitively bid any MTW funding awarded through this activity to a third-party provider. HHA has provided summary information on potential projects for funding under this activity; however, other projects may also be considered subject to approval of the HHA Board of Commissioners. This activity supports the goals to increase housing choices for low-income households and to leverage additional funds for affordable housing development.

**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.**

HHA identified potential sites for use of this waiver in both the FY 2023 and 2024 MTW Supplements and may proceed to provide funding based on approval by the HHA Board of Commissioners.

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

No

**Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Fountain View TBD	New construction - Development approach including financing and unit counts are preliminary and subject to change	TBD	250.00	250.00	0.00	0.00	0.00	0.00
Sweetwater Apartments	Rehabilitation/preservation of existing 260 unit LIHTC development that includes 26 public housing units	TBD	260.00	0.00	0.00	0.00	0.00	0.00
Mansions at Turkey Creek	Rehabilitation/preservation of existing 252 unit LIHTC development	TBD	252.00	0.00	0.00	0.00	0.00	0.00
HRI		TBD	0.00	0.00	0.00	0.00	0.00	0.00

**Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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**Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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**Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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<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></p> <p>No Agency-Specific Waivers are being requested.</p>
<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></p> <p>Yes</p> <p><b>Has there been a change in how the waiver is being implemented from when it was originally approved?</b></p> <p>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.

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
2021	\$16,089,982	\$16,089,982	\$0	2029-09-30
2022	\$16,946,888	\$16,946,888	\$0	2030-09-30
2023	\$14,423,032	\$14,423,032	\$0	2031-09-30

<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	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	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.	0 # 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.	0 # 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	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
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.	

I.	Evaluations.
Yes - This table lists evaluations of Houston's MTW activities, including the names of evaluators and available reports	

**Table I.1 - Evaluations of MTW Policies**

Title and short description	Evaluator name and contact information	Time period	Reports available
As part of MTW Cohort #2, MDRC is providing technical assistance and conducting an evaluation of the alternative rent structures to be implemented by HHA and other Cohort #2 agencies.	MDRC Contact: Keith Olejniczak, Research Associate Email: keith.olejniczak@mdrc.org Phone: 510-844-2306	Evaluation will be conducted over a six-year period beginning at study enrollment.	N/A