



HOUSTON HOUSING AUTHORITY FY 2026

PART III: MTW SUPPLEMENT

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PHA Name : Houston

PHA Code: TX005

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

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) 2026 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 has and will continue to 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 fifth MTW Supplement submitted by HHA. HHA is also required to submit an Annual PHA Plan.

Over the coming year, HHA will utilize MTW flexibility to benefit residents and program participants and to support the agency mission and strategic objectives including the Five-Year PHA Plan goals for 2025-2029. 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.

In FY 2026, HHA is proposing two new MTW activities designed to expand housing opportunity and promote family self-sufficiency:

1. **Special Referral Program:** this activity will combine project-based voucher (PBV) housing with education- and workforce-focused self-sufficiency supports, in partnership with local higher education and workforce development organizations. In FY 2026, HHA proposes to plan for implementation of the first phase of this initiative at the Carpenter Apartments in partnership with Family Scholar House (FSH). This activity is being proposed as an Agency-Specific Waiver (see attachments, including an impact analysis and hardship policy).
2. **Local Homelessness Response and Housing Stability Initiative:** will allow HHA to use MTW Block Grant flexibility under Waivers 17.a, 17.b, and 17.c to contribute funds toward local efforts to address street and unsheltered homelessness. Through this initiative, HHA may support the development of new housing units, the provision of rental subsidies, and delivery of supportive services aligned with HHA's and the City of Houston's homelessness response goals. Together, these activities advance HHA's MTW objectives of promoting self-sufficiency, expanding housing choice, and achieving greater cost effectiveness in meeting community needs and priorities.

In addition to these newly proposed activities, in FY 2026 HHA will continue implementation of the alternative rent policies evaluation initiative, for which initial enrollment began in FY 2023. In addition to the alternative rent policies, a series of other HUD-approved MTW flexibilities will also continue to be implemented including triennial recertifications; administrative efficiencies including self-certification of assets and a streamlined verification hierarchy; more flexible Small Area Fair Market Rent payment standards to support voucher participant mobility; Project Based Voucher (PBV) program and inspection policies; landlord leasing incentives; use of MTW funds for local, non-traditional development activities; extending the grace period for over-income public housing households to remain in a subsidized public housing unit; and allowing for extension of the term of the FSS Contract of Participation to seven years.

HHA also received HUD approval in FY 2025 for a waiver to increase the PBV program cap and allow HHA to project-base up to 50% of the lower of either its total authorized units or annual budget authority.

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 2026, 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. 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/NSPIRE compliance, modify the frequency of HQS/NSPIRE inspections, and offer additional financial incentives to increase landlord participation in the voucher program, as funding is available. To promote preservation and expansion, HHA may also engage in other HUD-approved MTW initiatives including establishing alternative PBV selection processes.
- **Self-Sufficiency:** Ongoing implementation of the HHA alternative tiered rent model, triennial reexaminations, and related activities will continue to be focal points in FY 2026. 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 down payment assistance; education, job training and placement and other supportive services for HHA clients; and affordable housing development and preservation.

All MTW activities and waivers described in this document 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).

1. Tenant Rent Policies	
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
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Currently Implementing
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
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
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Currently Implementing
b. Damage Claims (HCV-Tenant-based Assistance)	Currently Implementing
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Currently Implementing
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Currently Implementing
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently Implementing
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
10. Family Self-Sufficiency Program with MTW Flexibility	
d.PH Modify or Eliminate the Contract of Participation (PH)	Currently Implementing
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Currently Implementing
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Plan to Implement in the Submission Year
b. Service Provision	Plan to Implement in the Submission Year
c. Housing Development Programs	Currently Implementing

C. MTW Activities Plan that Houston Plans to Implement in the Submission Year or Is Currently Implementing**1.a. - Tiered Rent (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. 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. In FY 2025 HHA continued the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). In FY 2026 HHA will continue to implement these policies as applicable.
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

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
- 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.

In FY 2025 HHA continued the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). In FY 2026 HHA will continue to implement these policies as applicable.

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

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 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. In FY 2025 HHA continued the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). In FY 2026 HHA will continue to implement these policies as applicable.
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 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 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

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 • 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. In FY 2025 HHA continued the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). In FY 2026 HHA will continue to implement these policies as applicable.
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

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 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 FY 2025 HHA continued the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). In FY 2026 HHA will continue to implement these policies as applicable.

Roll out to households excluded from participation in the alternative rent policy study is also projected to continue in FY 2026.

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.

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

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 applying these exclusions as part of the rent study random assignment process for the alternative tiered rent study. In FY 2025 HHA continued the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). In FY 2026 HHA will continue to implement these policies as applicable. Roll out to households excluded from participation in the alternative rent policy study is also projected to continue in FY 2026.
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. Since approval of this activity, HHA has utilized SAFMRs to establish payment standards for the tenant-based program only. Citywide FMRs are currently utilized for the Project Based Voucher program. In FY 2026 and future years, HHA may elect to establish payment standards based on either metropolitan area Fair Market Rents (FMRs) or Small Area Fair Market Rents (SAFMRs). 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
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 continues to review and adjust program payment standards on an annual basis. HHA will utilize the flexibility under this waiver to establish higher payment standards for the tenant-based voucher program as needed and/or as funding is available. In FY 2026 and future years, HHA may elect to establish payment standards based on either metropolitan area

Fair Market Rents (FMRs) or Small Area Fair Market Rents (SAFMRs).
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 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 or its subsidiaries 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 continues 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.
See attached excerpt from the HHA HCV Administrative Plan. Note that this document was originally submitted as part of the FY 2022 MTW Supplement.

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 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 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.
This activity is related to the HHA tiered rent evaluation initiative discussed in MTW activity 1a; however, except for

households in the "control" group who will continue to be recertified annually, it will also be applied to all other 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.

In FY 2025 HHA continued the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). In FY 2026 HHA will continue to implement these policies as applicable.

Roll out to households excluded from participation in the alternative rent policy study is also projected to continue in FY 2026.

Does this MTW activity require a hardship policy?

Provided Already

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

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.

Except for "control" group households who continue to be recertified annually, 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 the HHA Hardship Policy. HUD approved the HHA Safe Harbor Waiver in conjunction with implementing triennial recertifications for this group.

Except for households in the "control" 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, except for "control" group households who will continue to be recertified annually, 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. In FY 2025 HHA continued the enrollment and random selection process in consultation with HUD and MDRC (program evaluator). In FY 2026 HHA will continue to implement these policies as applicable. Roll out to households excluded from participation in the alternative rent policy study is also projected to begin in FY 2025.
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 initiatives.
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. Except for "control" group households who will continue to be recertified annually, 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.

3.c. - Self-Certification of Assets (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, 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.

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.

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 continue roll-out of asset self-certification for households excluded from the rent study in FY 2026.

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.

This waiver supports HHA's tiered rent initiative, and also reduced administrative burdens on staff and public housing residents.

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

\$50,000.

3.d. - Self-Certification of Assets (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, 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.

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. 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 rent study random assignment process for the alternative tiered rent study. However, HHA plans to continue roll-out of asset self-certification for households excluded from the rent study in FY 2026.
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. This waiver supports HHA's tiered rent initiative, and also reduced administrative burdens on staff and HCV participants.
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 This activity was first approved as part of the FY 2024 MTW Supplement. Under this activity, HHA provides vacancy loss payments to eligible landlords participating in the HCV tenant-based program in order to incentive continued participation in the HCV program. Landlords are 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 do not exceed one month of the contract rent and are paid to the owner when the next HAP contract is executed between HHA and the landlord. HHA has updated 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. In FY 2024 HHA began to plan for this initiative; however, HHA was unable to implement these activities due to funding constraints. In FY 2026 HHA will continue to plan for this initiative and will implement these activities when they are financially feasible.
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 This activity was first approved as part of the FY 2024 MTW Supplement. Under this activity, HHA provides damage claim payments to eligible landlords participating in the HCV tenant-based program in order to incentive continued participation in the HCV program. Landlords are 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 do 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 are paid to the owner when the next HAP contract is executed between HHA and the landlord. HHA has updated its Administrative Plan to reflect this damage claim policy. This activity supports HHA 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

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. In FY 2024 HHA began to plan for this initiative; however, HHA was unable to implement these activities due to funding constraints. In FY 2026 HHA will continue to plan for this initiative and will implement these activities when they are financially feasible.
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? 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).
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.c. - Other Landlord Incentives (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 This activity was first approved as part of the FY 2024 MTW Supplement. Under this activity, HHA provides 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 do not exceed one month of the contract rent, and are paid to the owner when the HAP contract is executed between HHA and the landlord. HHA has updated its Administrative Plan to reflect this leasing incentive activity. Leasing incentives support HHA efforts to expand housing choices for tenant-based voucher holders.
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 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. 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 HCV tenant-based program.
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 2024 HHA began to plan for this initiative; however, HHA was unable to implement these activities due to funding constraints. In FY 2026 HHA will continue to plan for this initiative and will implement these activities when they are financially feasible.
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 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 in both the tenant-based and Project Based Voucher programs to determine if the unit meets HUD Housing Quality Standards (or successor standards), 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 (or successor standards) 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. Implementation is projected to take place in FY 2026.

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 (or successor standards) 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 (or successor standards). To ensure the consistent and uniform application of inspection 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 inspection. 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 all properties with project-based vouchers
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 projects that this activity will be implemented 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 Quality Assurance Method that was originally submitted as part of the FY 2022 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 Housing Quality Standards (or successor standards) at initial occupancy. The alternative inspection will require that all units meet HUD HQS (or successor standards) 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 may 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
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 projects that this activity will be rolled out in FY 2026.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

9.a. - Increase PBV Program 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 approved in the FY 2025 MTW Supplement. This activity gives HHA the flexibility to raise the program cap for the Project Based Voucher (PBV) program to up to 50% of the lower of either the total authorized HCV units or annual budget authority. 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 all properties with project-based vouchers

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.

No updates to this activity are proposed for FY 2026.

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

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

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 all properties with project-based vouchers

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 utilize this MTW flexibility as it determines appropriate and in accordance with the Operations Notice in response to 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 (or successor standards) 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.

As described above, this activity 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.

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 MTW flexibility 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**

This activity was first approved as part of the FY 2024 MTW Supplement. It allows HHA to 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 supports 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
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. Implementation is projected to begin in FY 2026.
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 This activity was first approved as part of the FY 2024 MTW Supplement. It allows HHA to 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 ACOP. 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
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 will continue to implement this waiver where applicable to specific households who are (or who become) over-income.
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.a. – Rental Subsidy 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**

In partnership with waivers 17.b. and 17.c., HHA is proposing this activity to authorize HHA to implement a Local Homelessness Response and Housing Stability Initiative to address street and unsheltered homelessness in alignment with the City of Houston's community-wide plan to reduce homelessness. This activity will leverage MTW Block Grant flexibility and fungibility across funding sources to contribute resources for housing, supportive services, and housing development efforts targeted toward individuals and families experiencing homelessness or at imminent risk of homelessness. Under this activity, HHA may use MTW funds to:

- Provide rental assistance or housing stabilization subsidies outside the traditional Section 8 framework (Waiver 17.a);
- Fund or co-fund services and housing supports such as case management, rapid rehousing, outreach, or tenancy-sustaining services (Waiver 17.b); and
- Contribute to or partner in the development or acquisition of units (including, but not limited to, Permanent Supportive Housing units, LIHTC funded units, or nontraditional transitional housing units designed to rapidly provide housing to address immediate needs to house those living on the streets in Houston) dedicated to housing persons experiencing homelessness (Waiver 17.c).

The activity will align with the City's Homelessness Strategic Plan and complement regional efforts led by Coalition for the Homeless and The Way Home Continuum of Care. HHA's participation will include the flexibility to contribute a portion of MTW funds to a city-managed flexible housing or homelessness fund, provided that such funds are restricted for eligible low-income or homeless households and used only for activities authorized under the MTW Operations Notice.

The initiative expands the reach of traditional HUD homelessness definitions by including individuals and families who are unsheltered, living in places not meant for habitation, or otherwise housing insecure, even if they do not meet HUD's definition of "chronically homeless." HHA will remain in compliance with all safe harbors previously noted above.

HHA will ensure full compliance with the safe harbor requirements established in the MTW Operations Notice for Local, Non-Traditional Activities. HHA will not expend more than 10 percent of its total HAP budget authority on Local, Non-Traditional activities in any fiscal year. All households or individuals served will meet the HUD definition of low-income ($\leq$ 80 percent of area median income). HHA will comply with Notice PIH 2011-45 (or successor guidance) and will ensure that any MTW funding awarded to third-party providers is competitively procured. If MTW funds are used to provide participant services or incentives, such incentives will not take the form of a deduction to the household's rent contribution, and the amount of any incentive will not exceed one month of the applicable unit's rent, as applicable. For any housing development or construction activity, HHA will also comply with Section 30 of the U.S. Housing Act of 1937.

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

Increase Housing Choice; Promote Self-Sufficiency; Achieve Greater 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.

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.

n/a – new waiver request

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

No

17.b. – Service Provision

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

In partnership with waivers 17.a. and 17.c., HHA is proposing this activity to authorize HHA to implement a Local Homelessness Response and Housing Stability Initiative to address street and unsheltered homelessness in alignment with the City of Houston's community-wide plan to reduce homelessness. This activity will leverage MTW Block Grant flexibility and fungibility across funding sources to contribute resources for housing, supportive services, and housing development efforts targeted toward individuals and families experiencing homelessness or at imminent risk of homelessness. Under this activity, HHA may use MTW funds to:

- Provide rental assistance or housing stabilization subsidies outside the traditional Section 8 framework (Waiver 17.a);
- Fund or co-fund services and housing supports such as case management, rapid rehousing, outreach, or tenancy-sustaining services (Waiver 17.b); and
- Contribute to or partner in the development or acquisition of units (including, but not limited to, Permanent Supportive Housing units, LIHTC funded units, or nontraditional transitional housing units designed to rapidly provide housing to address immediate needs to house those living on the streets in Houston) dedicated to housing persons experiencing homelessness (Waiver 17.c).

The activity will align with the City's Homelessness Strategic Plan and complement regional efforts led by Coalition for the Homeless and The Way Home Continuum of Care. HHA's participation will include the flexibility to contribute a portion of MTW funds to a city-managed flexible housing or homelessness fund, provided that such funds are restricted for eligible low-income or homeless households and used only for activities authorized under the MTW Operations Notice.

The initiative expands the reach of traditional HUD homelessness definitions by including individuals and families who are unsheltered, living in places not meant for habitation, or otherwise housing insecure, even if they do not meet HUD's definition of "chronically homeless." HHA will remain in compliance with all safe harbors previously noted above.

HHA will ensure full compliance with the safe harbor requirements established in the MTW Operations Notice for Local, Non-Traditional Activities. HHA will not expend more than 10 percent of its total HAP budget authority on Local, Non-Traditional activities in any fiscal year. All households or individuals served will meet the HUD definition of low-income ($\leq$ 80 percent of area median income). HHA will comply with Notice PIH 2011-45 (or successor guidance) and will ensure that any MTW funding awarded to third-party providers is competitively procured. If MTW funds are used to provide participant services or incentives, such incentives will not take the form of a deduction to the household's rent contribution, and the amount of any incentive will not exceed one month of the applicable unit's rent, as applicable. For any housing development or construction activity, HHA will also comply with Section 30 of the U.S. Housing Act of 1937.

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

Increase Housing Choice; Promote Self-Sufficiency; Achieve Greater 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.

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.

n/a – new waiver request

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

No

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 for properties in which HHA has no interest. Non-competitive selection applies to projects in which HHA or its affiliates has an ownership interest. 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.

In FY 2026 HHA will expand this activity to implement a Local Homelessness Response and Housing Stability Initiative to address street and unsheltered homelessness in alignment with the City of Houston's community-wide plan to reduce homelessness. This activity will leverage MTW Block Grant flexibility and fungibility across funding sources to contribute resources for housing, supportive services, and housing development efforts targeted toward individuals and families experiencing homelessness or at imminent risk of homelessness. Under this activity, HHA may use MTW funds to:

- Provide rental assistance or housing stabilization subsidies outside the traditional Section 8 framework (Waiver 17.a);
- Fund or co-fund services and housing supports such as case management, rapid rehousing, outreach, or tenancy-sustaining services (Waiver 17.b); and
- Contribute to or partner in the development or acquisition of units (including, but not limited to, Permanent Supportive Housing units, LIHTC funded units, or nontraditional transitional housing units designed to rapidly provide housing to address immediate needs to house those living on the streets in Houston) dedicated to housing persons experiencing homelessness (Waiver 17.c).

The activity will align with the City's Homelessness Strategic Plan and complement regional efforts led by Coalition for the Homeless and The Way Home Continuum of Care. HHA's participation will include the flexibility to contribute a portion of MTW funds to a city-managed flexible housing or homelessness fund, provided that such funds are restricted for eligible low-income or homeless households and used only for activities authorized under the MTW Operations Notice. The initiative expands the reach of traditional HUD homelessness definitions by including individuals and families who are unsheltered, living in places not meant for habitation, or otherwise housing insecure, even if they do not meet HUD's definition of "chronically homeless." HHA will remain in compliance with all safe harbors previously noted above.

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.

MTW funds were utilized for the following projects: APV/HOAPV (\$10 million RAD conversion project) and HRI/Victory (\$8 million RAD conversion project).

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
Cuney Homes Phase I	New Construction	GAP Financing	80	80	0	64	16	0
Cuney Homes Phase II	New Construction	GAP Financing	115	155	0	50	65	40

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
Cuney Homes Phase I	New Construction	GAP Financing	80	80	0	64	16	0
Cuney Homes Phase II	New Construction	GAP Financing	115	155	0	50	65	40

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
Allen Parkway Village	Rehabilitation	GAP Financing	278	278	0	278	0	0
Historic Oaks of Allen Parkway Village	Rehabilitation	GAP Financing	222	222	0	222	0	0
Victory/HRI	Rehabilitation	GAP Financing	140	140	0	140	0	0
Mansions at Turkey Creek	Rehabilitation	GAP Financing	252	252	252	0	0	0

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
Allen Parkway Village	Rehabilitation	GAP Financing	278	278	0	278	0	0

Historic Oaks of Allen Parkway Village	Rehabilitation	GAP Financing	222	222	0	222	0	0
Victory/HRI	Rehabilitation	GAP Financing	140	140	0	140	0	0
Mansions at Turkey Creek	Rehabilitation	GAP Financing	252	252	252	0	0	0

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

E.	Agency-Specific Waiver(s).
E.1	Agency-Specific Waiver(s) for HUD Approval: 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. 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. 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. Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year? Yes – see attachment

Agency-Specific Waiver(s) for which HUD Approval has been Received:

Does the MTW agency have any approved Agency-Specific Waivers?

Yes

E.2

Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
Alternative Verification Hierarchy	No			
N/A	No			
Alternative Verification Hierarchy FY 2023	No			

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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
2024	\$16,361,167	\$16,361,167	\$0	2032-09-30
2025	\$22,919,192	\$22,919,192	\$0	2033-09-30

G.	MTW Statutory Requirements.
G.1	75% Very Low Income – Local, Non-Traditional. 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.
Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	
49%-30% Area Median Income	
Below 30% Area Median Income	
Total Local, Non-Traditional Households	0

*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.

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

G.3	Substantially the Same (STS) – Local, Non-Traditional.
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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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
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	0

H.	Public Comment
To be attached following the conclusion of the public comment period.	

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.	No

HOUSTON HOUSING AUTHORITY

AGENCY-SPECIFIC WAIVER REQUEST: SPECIAL REFERRAL PROGRAM

Under the Moving to Work (MTW) Operations Notice, MTW agencies are allowed to request Agency-Specific Waivers for activities that are not specially included in Appendix I of the Operations Notice. The Houston Housing Authority (HHA) is proposing to implement the following activity in the Housing Choice Voucher (HCV) program pursuant to an Agency-Specific Waiver.

A. Description Of Activity

This activity will waive provisions of certain HUD regulations to allow HHA to establish a Special Referral Program that combines project-based voucher (PBV) housing with education- and workforce-focused self-sufficiency supports. HHA will partner with local educational institutions and workforce development organizations to identify and refer eligible families who are pursuing post-secondary education or vocational certification. Vouchers funded under this activity will be authorized to apply site- or unit-specific local preferences, adopt alternative eligibility criteria, and establish requirements for continued assistance and term-limited assistance designed to promote HHA's goals of expanding educational attainment, increasing workforce participation, and advancing family self-sufficiency, which are consistent with MTW statutory goals.

In FY 2026, HHA proposes to plan for implementation of the first phase of this initiative at the Carpenter Apartments in partnership with Family Scholar House (FSH), which will coordinate referrals and provide supportive services for program participants. The Carpenter Apartments will receive Project-Based Voucher (PBV) assistance and are part of the required replacement housing for the Cuney Homes/Third Ward Choice Neighborhoods Implementation (CNI) Grant. By way of background, HHA notes that the Louisville Metropolitan Housing Authority, a legacy MTW agency, is implementing a similar Family Scholar House partnership program utilizing MTW flexibility.

Existing Cuney House residents who wish to participate in the FSH program will have priority for admission to the Carpenter Apartments FSH units and no additional restrictions will apply to their assistance while they continue to reside at Carpenter Apartments.

For all other applicants referred to the FSH program at Carpenter House, the following restrictions will apply:

- **Student Enrollment:** At initial qualification, the participant must be enrolled full-time in an undergraduate degree or specialty certification program at a Texas-accredited institution of higher education, with at least one year (minimum 24 credit hours) remaining to completion. HHA defines full-time enrollment as 12 credit hours per semester, unless the institution defines it differently.
- **Ongoing Enrollment:** Participants must maintain full-time enrollment during fall and spring semesters. Exceptions for reduced course loads may be approved for one semester due to medical or other verified hardship, after which full-time status must resume. Assistance may continue if the participant is completing final coursework or required classes offered only in limited semesters. Enrollment in summer courses is not required; however, any summer employment income must be reported to HHA.
- **Eligible Families:** At admission, the family must be a single parent with primary custody of minor child(ren) or a two-parent household with minor child(ren). At least one adult must be enrolled in the degree or certification program.

- **Academic Standing:** At least one enrolled adult must remain in good standing with the educational institution and maintain a cumulative GPA of 2.0 or higher (or equivalent) by the end of the second semester and each semester thereafter to remain eligible for continued assistance.
- **Graduation and Transfer:** Upon completion of the degree or certification program, the family's participation in the program will end. Assistance may not be transferred to another unit, except when required to complete the same degree at another accredited institution.

HHA will implement a hardship policy to provide temporary relief for participants who experience circumstances beyond their control (such as medical, family, or academic challenges) that affect compliance with program requirements. The hardship policy will allow for extensions of up to six months to maintain housing stability while supporting the program's self-sufficiency goals. See the Hardship Policy attachment for more information. Applicants and participants will also have access to HHA's regular informal review/hearing processes (as applicable) in accordance with its policies.

With respect to establishing local preferences and admission policies, this activity requires waiver of certain provisions of 24 CFR § 982.201, 24 CFR § 982.202, 24 CFR § 982.207, and 24 CFR 983.251. With respect to implementing term limits, this activity requires a waiver of certain provisions of sections 8(o)(7)(A)-(C) of the 1937 Act and 24 CFR 982.303, 982.309(a), 982.552(a), 983.256(f), and 983.257.

B. Relationship to MTW Statutory Objectives

This activity supports the MTW objectives of promoting self-sufficiency and increasing housing choice.

C. Population Groups and Household Types Impacted by Activity

This activity will apply to HCV PBV program participants and applicants. It is not projected to create any hardships for applicants or participants. Participants may access HHA's Hardship Policy if an extension is needed or they are otherwise unable to fulfill program requirements (see attached Hardship Policy). Applicants and participants will also have access to HHA's regular informal review/hearing processes (as applicable) in accordance with its policies.

D. Cost Implications

This is a cost/revenue neutral activity.

E. Implementation Timetable

HHA expects to complete planning and partner coordination during FY 2026, with implementation anticipated to occur once the HAP contract for the PBV units has been executed.

F. Impact Analysis

See attached.

G. Hardship Policy

See attached Hardship Policy.

H. Public Comments

TBD

HOUSTON HOUSING AUTHORITY
AGENCY-SPECIFIC WAIVER: SPECIAL REFERRAL PROGRAM

IMPACT ANALYSIS

Under the Moving to Work (MTW) Operations Notice, MTW agencies are required to prepare an impact analysis as a “safe harbor” for certain activities proposed in the annual MTW Supplement. MTW agencies must prepare the impact analysis:

- Prior to implementation of the MTW activity, if required as a safe harbor;
- For certain activities as defined in the MTW Operations Notice on an annual basis during the implementation of the MTW activity;
- Prior to any Safe Harbor Waiver or Agency-Specific Waiver requests; and,
- At the time the MTW activity is closed out, if an impact analysis was previously required.

HHA has prepared this impact analysis in conjunction with the MTW Supplement for the fiscal year beginning on January 1, 2026. This analysis describes the projected impacts of the requested Agency-Specific Waiver related to HHA’s proposed Special Referral Program activity.

A. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)

The activity is revenue neutral. HHA is not proposing to modify the calculation of tenant rent or subsidy under this activity; therefore, HHA does not project any substantive change in costs to the agency or impact on family’s contribution to rent.

B. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)

HHA does not project any impact on the affordability of housing costs for families.

C. Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)

HHA does not expect that the proposed activity will have any impact on the agency’s waitlist including on the amount of time families are on the waitlist

D. Impact on the agency’s termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)

This activity is not expected to have a measurable impact on the agency’s overall termination rate. However, because participation in the program is term-limited and tied to completion of an educational or certification program, the attrition rate for these specific units is expected to be higher than typical PBV households. Terminations will primarily result from successful graduation or voluntary exit rather than noncompliance or loss of eligibility. HHA will track program participation, graduation dates, and reasons for exit to monitor attrition trends and distinguish between positive and negative outcomes.

HHA’s current informal review/hearing policies provide participating families with the opportunity to dispute termination of assistance.

E. Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program

HHA does not expect that implementation of this activity will have any measurable impact on current HCV utilization rates.

F. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice

This activity primarily advances the MTW statutory goal of promoting self-sufficiency by combining stable, subsidized housing with educational attainment and workforce participation requirements. The activity supports long-term income growth and reduces dependence on housing assistance as participating families complete their degree or certification programs and transition to employment.

G. Impact on the agency's ability to meet the MTW statutory requirements

Implementation is not projected to have a measurable impact on HHA's ability to meet the MTW statutory requirements. HHA intends to fully comply with the MTW statutory requirements throughout its participation in the MTW Demonstration.

H. Impact on the rate of hardship requests and the number granted and denied as a result of this activity

This activity is not expected to result in a significant increase in hardship requests. While participants may occasionally request temporary relief due to medical, family, or academic challenges, such instances are anticipated to be limited due to the ongoing supports provided. HHA's hardship policy allows for short-term extensions of up to six months, and most requests are expected to be approved and resolved without resulting in loss of assistance.

I. Across the other factors above, the impact on protected classes (and any associated disparate impact).

HHA does not project any negative impacts including disparate impacts on protected classes as a result of implementing the requested Agency-Specific Waiver.

HOUSTON HOUSING AUTHORITY
AGENCY-SPECIFIC WAIVER: SPECIAL REFERRAL PROGRAM
HARDSHIP POLICY

HHA recognizes that participants may experience circumstances beyond their control that temporarily affect their ability to meet the ongoing eligibility and participation requirements of the Family Scholar House (FSH) Special Referral Program. The purpose of this hardship policy is to ensure consistent and equitable consideration of such circumstances while maintaining program integrity and the self-sufficiency objectives of the activity.

1. Eligibility for Hardship

A participant may request hardship consideration if one or more of the following conditions occur and directly impact their ability to comply with program requirements:

- Documented medical condition, illness, or disability of the participant or an immediate family member;
- Loss of childcare or transportation that temporarily prevents class attendance;
- Family crisis, domestic violence, or other emergency situation that disrupts enrollment;
- Documented academic difficulty leading to probation or loss of good standing for reasons beyond the participant's control (e.g., illness, family emergency);
- Institutional or programmatic changes (e.g., class cancellation or delayed course availability) that affect full-time enrollment;
- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;
- The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items; or
- Other comparable circumstances, as determined by HHA on a case-by-case basis.

2. Hardship Request

Participants must submit a written hardship request to HHA within 30 calendar days of the event or notification of noncompliance. The request must describe the hardship, provide supporting documentation, and specify the expected duration of the condition. HHA may request additional documentation from the participant or relevant institutions to verify circumstances.

When a participant requests a hardship exemption from a required MTW activity, HHA shall suspend the activity for the household, beginning the next month after the request, until HHA has determined if the request is warranted. HHA shall make the determination of whether a hardship exists within a reasonable time after the family's request. If HHA determines that a hardship exists, HHA shall continue to provide an exemption from the MTW activity for up to six months, in accordance with this policy. If HHA determines that the request did not meet its hardship standards, it shall resume the MTW activity with notice to the participant.

3. Hardship Relief Options

Upon approval of a hardship request, HHA may, in coordination with the Family Scholar House partner agency, authorize one or more of the following temporary adjustments for up to six (6) months:

- Allow a reduced course load (less than full-time enrollment);
- Suspend the GPA requirement while the hardship is in effect;
- Approve continued housing assistance while the participant takes an official leave of absence; or
- Allow continued assistance following relocation from the site for health, safety, or accessibility reasons, if an appropriate transfer unit is available.

Extensions beyond six months may be granted only with approval from HHA management based on continued verification of need.

Participants who do not resume full compliance with program requirements after the approved hardship period, or who withdraw from the educational program without good cause, will be subject to termination of assistance under HHA's MTW policies and informal hearing procedures. Participants who move from the site without HHA approval, other than for an approved safety, accessibility, or hardship reason, will be terminated from the program.

4. Grievance and Second-Level Review:

If a participant's hardship request is denied, HHA will provide written notice stating the reason for the denial and will allow the family to request a second-level review. The second-level review will be conducted by a staff member or manager who was not involved in the initial decision. The reviewing official will consider all documentation provided by the participant and will issue a written determination within 30 calendar days. This process will serve as the required second-level review in accordance with the MTW Operations Notice.

5. Anticipated Impact

This hardship policy is intended to prevent involuntary loss of housing due to short-term or unavoidable circumstances, ensuring that families continue to have the opportunity to achieve educational and employment goals. HHA does not anticipate that application of this policy will result in undue hardship or increased housing instability among participating families.

6. Record Retention

HHA shall keep records of all hardship requests received and the results of these requests and supply them at HUD's request. This information shall be retained by HHA for the duration of its participation in the MTW demonstration program and available for public review and inspection at HHA's principal office during normal business hours.

Houston Housing Authority
Public Housing Program – Tiered Rent Schedule

The tiered rent schedule for public housing is shown below. As applicable, public housing tiered rents are capped at the flat rent and/or Low Income Housing Tax Credit rent for the unit.

Tier #	Income Tier Based on Gross Household Income	Rent (Total Tenant Payment)
1.	\$0 to \$1,999	\$50
2.	\$2,000 to \$3,999	\$50
3.	\$4,000 to \$5,999	\$93
4.	\$6,000 to \$7,999	\$140
5.	\$8,000 to \$9,999	\$187
6.	\$10,000 to \$11,999	\$233
7.	\$12,000 to \$13,999	\$280
8.	\$14,000 to \$15,999	\$327
9.	\$16,000 to \$17,999	\$373
10.	\$18,000 to \$19,999	\$420
11.	\$20,000 to \$21,999	\$467
12.	\$22,000 to \$23,999	\$513
13.	\$24,000 to \$25,999	\$560
14.	\$26,000 to \$27,999	\$607
15.	\$28,000 to \$29,999	\$653
16.	\$30,000 to \$31,999	\$700
17.	\$32,000 to \$33,999	\$747
18.	\$34,000 to \$35,999	\$793
19.	\$36,000 to \$37,999	\$840
20.	\$38,000 to \$39,999	\$887
21.	\$40,000 to \$41,999	\$933
22.	\$42,000 to \$43,999	\$980
23.	\$44,000 to \$45,999	\$1,027
24.	\$46,000 to \$47,999	\$1,073
25.	\$48,000 to \$49,999	\$1,120
26.	\$50,000 to \$51,999	\$1,167
27.	\$52,000 to \$53,999	\$1,213
28.	\$54,000 to \$55,999	\$1,260
29.	\$56,000 to \$57,999	\$1,307
30.	\$58,000 to \$59,999	\$1,353
31.	\$60,000 to \$61,999	\$1,400
32.	\$62,000 to \$63,999	\$1,447
33.	\$64,000 to \$65,999	\$1,493

Tier #	Income Tier Based on Gross Household Income	Rent (Total Tenant Payment)
34.	\$66,000 to \$67,999	\$1,540
35.	\$68,000 to \$69,999	\$1,587
36.	\$70,000 to \$71,999	\$1,633
37.	\$72,000 to \$73,999	\$1,680
38.	\$74,000 to \$75,999	\$1,727
39.	\$76,000 to \$77,999	\$1,773
40.	\$78,000 to \$79,999	\$1,820
41.	\$80,000 to \$81,999	\$1,867
42.	\$82,000 to \$83,999	\$1,913
43.	\$84,000 to \$85,999	\$1,960
44.	\$86,000 to \$87,999	\$2,007
45.	\$88,000 to \$89,999	\$2,053
46.	\$90,000 to \$91,999	\$2,100
47.	\$92,000 to \$93,999	\$2,147
48.	\$94,000 to \$95,999	\$2,193
49.	\$96,000 to \$97,999	\$2,240
50.	\$98,000 to \$99,999	\$2,287
51.	\$100,000 to \$101,999	\$2,333
52.	\$102,000 to \$103,999	\$2,380
53.	\$104,000 to \$105,999	\$2,427
54.	\$106,000 to \$107,999	\$2,473
55.	\$108,000 to \$109,999	\$2,520
56.	\$110,000 to \$111,999	\$2,567
57.	\$112,000 to \$113,999	\$2,613
58.	\$114,000 to \$115,999	\$2,660

Houston Housing Authority
Housing Choice Voucher Program – Tiered Rent Schedule

The tiered rent schedule for the Housing Choice Voucher program is shown below. As applicable, Housing Choice Voucher program tiered rents are capped at the point when the Housing Assistance Payment equals zero.

Tier #	Income Tier Based on Gross Household Income	Rent (Total Tenant Payment)
1.	\$0 to \$1,999	\$50
2.	\$2,000 to \$3,999	\$50
3.	\$4,000 to \$5,999	\$93
4.	\$6,000 to \$7,999	\$140
5.	\$8,000 to \$9,999	\$187
6.	\$10,000 to \$11,999	\$233
7.	\$12,000 to \$13,999	\$280
8.	\$14,000 to \$15,999	\$327
9.	\$16,000 to \$17,999	\$373
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12.	\$22,000 to \$23,999	\$513
13.	\$24,000 to \$25,999	\$560
14.	\$26,000 to \$27,999	\$607
15.	\$28,000 to \$29,999	\$653
16.	\$30,000 to \$31,999	\$700
17.	\$32,000 to \$33,999	\$747
18.	\$34,000 to \$35,999	\$793
19.	\$36,000 to \$37,999	\$840
20.	\$38,000 to \$39,999	\$887
21.	\$40,000 to \$41,999	\$933
22.	\$42,000 to \$43,999	\$980
23.	\$44,000 to \$45,999	\$1,027
24.	\$46,000 to \$47,999	\$1,073
25.	\$48,000 to \$49,999	\$1,120
26.	\$50,000 to \$51,999	\$1,167
27.	\$52,000 to \$53,999	\$1,213
28.	\$54,000 to \$55,999	\$1,260
29.	\$56,000 to \$57,999	\$1,307
30.	\$58,000 to \$59,999	\$1,353
31.	\$60,000 to \$61,999	\$1,400
32.	\$62,000 to \$63,999	\$1,447
33.	\$64,000 to \$65,999	\$1,493
34.	\$66,000 to \$67,999	\$1,540

Tier #	Income Tier Based on Gross Household Income	Rent (Total Tenant Payment)
35.	\$68,000 to \$69,999	\$1,587
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45.	\$88,000 to \$89,999	\$2,053
46.	\$90,000 to \$91,999	\$2,100
47.	\$92,000 to \$93,999	\$2,147
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49.	\$96,000 to \$97,999	\$2,240
50.	\$98,000 to \$99,999	\$2,287
51.	\$100,000 to \$101,999	\$2,333
52.	\$102,000 to \$103,999	\$2,380
53.	\$104,000 to \$105,999	\$2,427
54.	\$106,000 to \$107,999	\$2,473
55.	\$108,000 to \$109,999	\$2,520
56.	\$110,000 to \$111,999	\$2,567
57.	\$112,000 to \$113,999	\$2,613
58.	\$114,000 to \$115,999	\$2,660

HOUSTON HOUSING AUTHORITY
RENT REASONABLENESS THIRD PARTY REQUIREMENT QUALITY ASSURANCE METHODS
MTW ACTIVITY 2.D.

HHA is authorized pursuant to Moving to Work (MTW) Activity 2.D as defined in the MTW Operations Notice to perform rent reasonableness determinations on Project Based Voucher (PBV) units that it owns, manages and/or controls. This activity 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, HHA will 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 Housing Choice Voucher (HCV) program including both tenant-based and project-based programs, i.e. HHA will determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area. The MTW Operations Notice requires that HHA establish and make available this quality assurance method.

Quality Assurance Standards

HHA conducts rent reasonableness determinations in accordance with applicable HUD regulations, unless waived pursuant to a HUD-approved MTW Supplement, and in accordance with HHA's HCV Administrative Plan. Before HHA can enter into a HAP contract with an owner, HHA must verify that the rent the owner proposes to charge is reasonable in relation to comparable units in the private unassisted market. HHA takes into consideration the location, size, type, quality and age of the units, and the amenities, housing services, and maintenance and utilities when determining comparability and the reasonable rent.

HHA makes a determination that the proposed rent is reasonable in relation to comparable units in the private unassisted market. The market area for rent reasonableness comparability is the City of Houston, Texas, that area five miles beyond the City of Houston, or the nearest and most appropriate comps considering the factors detailed in the HCV Administrative Plan.

Rent reasonableness determinations are conducted prior to entering into a Housing Assistance Payments (HAP) contract. HHA must also redetermine the reasonable rent:

- Whenever there is a 10 percent decrease in the published FMR in effect 60 days before the contract anniversary (for the unit sizes specified in the HAP contract) as compared with the FMR in effect 1 year before the contract anniversary.
- (Whenever HHA approves a change in the allocation of responsibility for utilities between the owner and the tenant;
- (Whenever the HAP contract is amended to substitute a different contract unit in the same building or project; and
- Whenever there is any other change that may substantially affect the reasonable rent.

Quality Assurance Method

On at least an annual basis, HHA supervisory staff shall conduct a quality assurance review of units covered under this MTW waiver utilizing the following information:

- Administrative Plan sections on Rent Reasonableness
- The number of families assisted in PBV units owned, managed and/or controlled by HHA.

The quality assurance review shall include the following action steps:

1. Determine the proper sample size based on the number of families assisted in PBV units owned, managed and/or controlled by HHA.
2. Select a random sample using the universe and table below.
3. Review Administrative Plan policies governing rent reasonableness.
4. Review each file for adherence to rent reasonableness policies and procedures.
5. Complete data collection form.
6. Determine what percent of families in the sample had reasonable rent determinations completed correctly.
7. Take action to address any material deficiencies in HHA's rent reasonableness process including, but not limited to, providing follow-up training to staff and/or adjusting the rent.

Universe Size	Minimum Number of files to be Sampled
50 or less	5
51 – 600	5 + 1 for each 50 (or part of 50) over 50
601 – 2000	16 plus 1 for each 100 (or part of 100) over 600
Over 2000	30 plus 1 for each 200 (or part of 200) over 2000

HOUSTON HOUSING AUTHORITY
RENT REASONABLENESS EXCERPTS FROM HCV ADMINISTRATIVE PLAN

H. Rent Reasonableness

Before HHA can enter into a HAP contract with an owner, HHA must verify that the rent the owner proposes to charge is reasonable.

Rent reasonableness determinations must be determined:

1. At initial lease up,
2. Owner-requested rent increase, or
3. If the published FMR is decreased by 10% or more to take effect 60 days before the contract anniversary (for the unit size rented by the family) as compared with the FMR in effect 1 year before the contract anniversary (24 CFR § 982.507).

As required by HUD regulations, before executing a HAP contract, HHA makes a determination that the proposed rent is reasonable in relation to comparable units in the private unassisted market. The market area for rent reasonableness comparability is the City of Houston, Texas, that area five miles beyond the City of Houston, or the nearest and most appropriate comps considering the factors listed in 4, below.

Rent must be reasonable in relation to rents charged by other owners for comparable unassisted units in the private market. The owner must not change the rent during the initial lease term. Subsequent requests for rent adjustments must be consistent with the lease between the owner and the family. Rent increases will not be approved unless any failed items identified by the most recent HQS inspection have been corrected.

4. HHA will consider some or all of the following factors in making a determination of reasonable rent:
 - a. Size
 - b. Location
 - c. Type
 - d. Quality
 - e. Amenities
 - f. Age
 - g. Maintenance Services
 - h. Housing Services
 - i. Non-housing Services (if any)
 - j. Utilities
5. If the owner does not agree on a contract rent that is reasonable, after the Authority has tried and failed to negotiate a revised rent, the Authority will inform the tenant that the lease cannot be approved. The tenant should continue to locate eligible housing if his/her Voucher has not expired.
6. If the unit's rent is determined to be reasonable or if the owner accepts the offer of a revised rent that is reasonable, the Authority will continue processing the Request for Tenancy Approval and Lease.

7. By accepting each monthly HAP payment from the Authority, the owner certifies that the rent to owner is not more than the rent charged by the owner for comparable unassisted units on the premises.
8. The owner must give the Authority information (if requested by the Authority) on rents charged by the owner for other units on the premises or elsewhere. The Authority will maintain records that include comparable data on unassisted units in the market.

I. Rent Increases to Owners

On or after the anniversary of the first year or term of the lease and HAP contract, owners may request a rent adjustment. All adjustment requests submitted to the Authority must be requested in writing in the format prescribed by the Authority. The owner must provide a 90-day advance notice to the family and supply a copy to the Authority. ***Owner rent adjustments, if determined reasonable by the Authority, are effective the first day of the first month commencing on or after the contract anniversary date or 60 days from the first of the month following receipt of the owner request, whichever is later.*** In order for the tenant to remain on the Housing Choice Voucher program in the unit, the new rent must meet rent reasonableness. If it does not, the Authority will attempt to negotiate the rent with the owner to an amount acceptable. If the Authority is unsuccessful and the owner proceeds with the rent increase, the tenant will be issued a voucher to move to a program acceptable unit.

The Authority reserves the right to suspend processing of owner requests for rent adjustments for no more than six months, whenever funds are not sufficient to cover the cost of such adjustments.

HOUSTON HOUSING AUTHORITY

HQS INSPECTION QUALITY ASSURANCE METHODS – ACTIVITY 5.C.

HHA will perform HUD Housing Quality Standards (HQS) inspections on Project Based Voucher units that are owned, managed and/or controlled by HHA. To ensure the consistency and uniformity of these HQS inspections, HHA shall perform quality control inspections on a random sample of HQS inspections completed on HHA owned units in accordance with the policies described in the Administrative Plan. The following information describes HHA's quality control inspection policies and HHA's HQS QC audit protocol.

A. Program Integrity and Ethics

General Principles:

1. HHA anticipates that the vast majority of families, owners, and HHA employees intend to and will comply with program requirements and make reasonable efforts to avoid errors.
2. To ensure that the HHA's HCV program is administered effectively and according to the highest ethical and legal standards, HHA will employ a variety of techniques to ensure that both errors and intentional program abuse are rare.
3. In addition to taking steps to prevent errors and program abuse, HHA will use a variety of activities to detect errors and program abuse.

Quality Control and Analysis of Data

1. Under the Section 8 Management Assessment Program (SEMAP), HUD requires completion of quality control HQS inspections to provide feedback on inspectors' work, which can be used to determine if individual performance or general HQS training issues need to be addressed.
2. HHA will also conduct HQS QC reviews on a random sample of HQS inspections completed on HHA owned units consistent with the SEMAP HQS QC protocol. The universe is the number of HHA owned units under HAP contract
3. HHA will use the results reported in any IPA or HUD monitoring reports to identify potential program abuses as well as to assess the effectiveness of the HHA's error detection and abuse prevention efforts.
4. HHA will review all referrals, specific allegations, complaints, and tips from any source including, other agencies, companies, and individuals, to determine if they warrant investigation. In order for the HHA to investigate, the allegation must contain at least one independently-verifiable item of information, such as the name of an employer or the name of an unauthorized household member.
5. HHA will investigate inconsistent information related to the family that is identified through file reviews and the verification process.

B. Management Assessment Objectives

The Authority operates its housing assistance program with efficiency and uses resources in a manner that reflects commitment to quality and service. The Authority's policies and practices are consistent with SEMAP goals and objectives.

In order to demonstrate compliance with HUD and other pertinent regulations, the Authority will maintain records, reports and other documentation for a time that is in accordance with HUD

requirements and in a manner that will allow an auditor, housing professional or other interested party to monitor the Authority's operational procedures and practices objectively and accurately.

In addition to SEMAP monitoring, to ensure quality control, supervisory staff performs random audits of all Housing Choice Voucher actions.

HQS QUALITY CONTROL INSPECTIONS AUDIT PROTOCOL - HHA OWNED UNITS

Universe	Minimum Number of Reinspections to be Conducted
50 or less	5
51 – 600	5 + 1 for each 50 (or part of 50) over 50
601 – 2000	16 plus 1 for each 100 (or part of 100) over 600
Over 2000	30 plus 1 for each 200 (or part of 200) over 2000

Quarter 1:

Period of review: _____

Universe: For HHA owned units, the number units under HAP contract where the last HQS Inspection was completed within the past three months:

Number of files to sample: _____

Quarter 2:

Period of review: _____

Universe: For HHA owned units, the number units under HAP contract where the last HQS Inspection was completed within the past three months

Number of files to sample: _____

Quarter 3:

Period of review: _____

Universe: For HHA owned units, the number units under HAP contract where the last HQS Inspection was completed within the past three months:

Number of files to sample: _____

Quarter 4:

Period of review: _____

Universe: For HHA owned units, the number units under HAP contract where the last HQS Inspection was completed within the past three months

Number of files to sample: _____

HOUSTON HOUSING AUTHORITY
HQS QUALITY CONTROL INSPECTIONS - HHA OWNED UNITS

Period of Review: _____

[illegible]

Analysis: (include issues identified and related recommendations and follow-up actions): _____