

PHA Name : Ann Arbor Housing Commission

PHA Code : MI064

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2024

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

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

Cost Effectiveness:

AAHC is eager to employ the funding and programmatic flexibility that MTW provides in order to more efficiently utilize its federally allocated funds. Our administrative processes, supportive services, and development projects will all benefit from MTW allowances and activities. The AAHC is actively partnering with local nonprofits, public agencies and local governments to increase the supply of affordable housing in the City of Ann Arbor, Washtenaw County, and Monroe County through financial tools, development of affordable housing on public property, project-based vouchers, zoning regulations and other public policy tools. AAHC plans to use MTW flexibilities to fund the programs and projects that it determines will be of the greatest benefit to our communities and incentivize potential partners to assist in our goal of increasing housing opportunity. Additionally, specific waivers such as those related to HQS inspections offers AAHC the opportunity to cut down on unnecessary staff time and rededicate itself to tasks that are of more immediate importance.

Self-Sufficiency:

AAHC partners with many local non-profits, mainstream service providers, and the private sector to build healthy residential communities and promote an atmosphere of pride and responsibility. The AAHC has contracts with 7 non-profit agencies to provide on-site support service to tenants who live in AAHC properties. The AAHC has a contract with SOS Community Services to provide eviction prevention services to all the AAHC's voucher tenants. A recent internal analysis of supportive services offered at AAHC properties indicated their tremendous effectiveness at preventing eviction and providing housing stability; outcomes among formerly homeless households were especially encouraging as compared to national trends. The AAHC has MOUs with many local agencies to assist homeless and disabled applicants complete the application process, search for housing, and successfully lease-up. The AAHC also works directly with the Michigan Works! agency to leverage employment and training opportunities for program participants. Additionally, AAHC works with private companies, local non-profits, and Habitat for Humanity to increase participation in the AAHC's Homeownership Program. The AAHC partners with the United Way to provide support services aimed at empowering families to build savings and financial capabilities as a pathway out of poverty. The AAHC also participates in HUD's Family Self Sufficiency Program. As an MTW agency, AAHC has the opportunity to divert funding to many of the aforementioned programs and partnerships. AAHC will continually analyze the effectiveness and financial state of these programs in order to determine how to best allocate funding to each of them.

Increasing Housing Choice:

According to the Martin Prosperity Institute's 2015 report "Segregated City, The Geography of Economic Segregation in America", Washtenaw County is the 8th most income segregated County in the United States. Low-Income residents in Washtenaw County have limited opportunities for mobility due to the high housing costs throughout the county, especially in high opportunity areas. The MTW designation can help the AAHC provide more numerous and more desirable choices through higher payment standards and landlord incentives to expand our pool of participating landlords. HUD has recognized a growing number of populations with specific needs that often go unmet by the existing housing infrastructure. AAHC's goal is to develop programs and housing stock targeted to the most underserved populations. In pursuit of this goal, we currently administer several special purpose voucher programs in addition to the Housing Choice Voucher and Project Based Voucher programs. AAHC recognizes the significant and immediate need for additional affordable housing. A recent market analysis for the City of Ann Arbor shows a market demand for 1,300 units at 30% AMI, 700 units at 31% to 60% AMI and 300 units at 61% to 100% AMI just in the downtown area. AAHC is looking to increase the housing opportunities through partnerships, private/non-profit development, acquisition, and utilizing programs such as MTW. The Corporation for Supportive Housing (CSH) recently completed a needs analysis for Permanent Supportive Housing for all of Washtenaw County and determined that in the next 10 years an additional 1,581 PSH units for single adults and 407 PSH units for families are needed. The AAHC currently has a homeless preference for its waitlist and partners with the Continuum of Care and multiple non-profits to house homeless households in AAHC PBV units as well as with tenant-based vouchers. The AAHC and its community partners work hard to create programs and opportunities for homeless households to live in low-poverty, high opportunity neighborhoods.

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)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Currently Implementing
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
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)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

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

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

2.a. - Payment Standards- Small Area Fair Market Rents (HCV)
<p>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</p> <p>Adopt and implement a reasonable policy to establish payment standards based upon Small Area Fair Market Rents (SAFMR). AAHC seeks to increase housing opportunity for program participants. This MTW activity contributes to the AAHC seeks to improve relationship with landlords, ensure our efforts matches those of the local market, recruit and retain landlord participation, apply measure to offset rent burdens, and encourage move to high opportunity areas.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>After establishing payment standards using SAFMR, participants residing in high opportunity areas have increased. In addition, rent burden decreased for those participants who previously lived in those low poverty areas.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the hardship policy apply to more than this MTW activity?</p> <p>Yes</p>
<p>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p> <p>2.b. - Payment Standards- Fair Market Rents (HCV)</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p> <p>No</p>
<p>How many hardship requests have been received associated with this activity in the past year?</p> <p>No hardship were requested in the most recent fiscal year.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

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

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

AAHC established payment standards based upon the SAFMR for the following ZIP codes: 48103, 48104, 48105, 48109, 48111, 48174, 48187, and 48188.

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Our agency established payment standards based upon 120% of the Fair Market Rents (FMR). The MTW activity will reduce rent burden of current participants and increase housing opportunities. Our agency intends to utilize this MTW activity to match local rental markets in an effort to retain and recruit landlord participation in the HCV program.

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.

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.

Our agency has retained several landlords and reduced rent burden after implementing this activity.

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 FMR:

The payment standard is set at 120% of the FMR within the PHA jurisdiction of Washtenaw and Monroe Counties; including those designated areas where the payment standard would be lower if the agency established a payment

standard based on the SAFMR.

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

AAHC offers incentives to participating landlords by providing vacancy payments to the owner. Our goals is to retain and increase the number of landlords it is working with and expand into new neighborhoods. We intend to address specific landlord issues such as, reluctance to join the HCV Program due to delays in leasing and costly repairs, in a effort to build and improve partnership between the landlord and PHA.

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?

Currently assisted households only

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.

Since implementing this activity the number of inquires from new owners have increased. In addition, current owners are less incline to end their participation in the HCV program.

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

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)

To all units

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

Payments made to the landlord must be equal to no more than one month of the contract rent.

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

1

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

\$1,800

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

AAHC encourage landlord participation by providing for compensation payments to the owner when the HCV participant causes damage to the unit. Our goals is to retain and increase the number of landlords we're working with and expand into new neighborhoods. We intend to address specific landlord issues such as, reluctance to join the HCV Program due to delays in leasing, costly repairs, in a effort to build and improve partnership between the landlord and PHA.

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?

Currently assisted households only

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.

This activity applies to all current tenant based voucher participants and project-based voucher participants.

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.

Since the agency has implemented this MTW activity we have retained several landlords who participant in the HCV program.

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

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for

example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?

To all units

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

The amount of damage claims must not exceed the lesser of the cost of repairs or two months of contract rent. In implementing this activity, the participant's security deposit must first be used to cover damages and the agency may provide up to two months of contract rent minus the security deposit to cover remaining repairs.

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

31

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

\$26,908

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

AAHC provides incentive payments such as security deposit, application fees, and signing bonus to participating landlords. Incentive payments are used in order to recruit new landlords to join the HCV program. By implement this activity we intend to increase housing choice for 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 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.

This activity is available to both tenant-based and project-based participants.

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.

Since implementation of this MTW activity, AAHC has initiated HAP contracts with new owners.

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?

Payments made to the landlord must be equal to no more than one month of the contract rent.

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

40

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

\$19,230

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

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

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
2023	\$7,683	\$7,683	\$0	2023-06-30

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		0
49%-30% Area Median Income		0
Below 30% Area Median Income		0
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? No	
Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline. MTW agency did not established a rent reform policy to encourage employment and self-sufficiency AAHC will review the options available and select one of the MTW Activities.	

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?
------------------------	--------	------	------	------	------	-------	-------------	------------------	-----------------------------	--	---	---	--

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
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

I.	Evaluations.
	No known evaluations.



U.S. Department of Housing and Urban Development

Detroit Field Office
Office of Public Housing
Patrick V. McNamara Federal Building
477 Michigan Avenue, Room 1710
Detroit, MI 48226-2592
Tel. (313) 226-7900 FAX (313) 226-6160

August 2, 2024

SENT VIA ELECTRONIC MAIL

Jennifer Hall
Executive Director, Ann Arbor Housing Commission
2000 S. Industrial
Ann Arbor, MI 48104
jhall@a2gov.org

Re: Approval of Moving to Work Supplement to the PHA Plan for Fiscal Year beginning 07/01/2024 for Ann Arbor Housing Commission (MI064)

Dear Executive Director:

This letter serves as notification that the Annual PHA Plan & MTW Supplement to the PHA Plan for the Ann Arbor Housing Commission submitted for the Fiscal Year beginning 07/01/2024 through Fiscal Year Ending 06/30/2024 is approved.

The Department's approval of this MTW Supplement is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act as outlined by the MTW Operations Notice. In providing assistance to families under programs covered by this MTW Supplement, your PHA must comply with the rules, standards, and policies established in the MTW Supplement as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Operations Notice.

Documents relying upon the approved MTW Supplement (i.e., HCV Administrative Plan, Public Housing Admission and Continued Occupancy Plan, etc.) should be updated to reflect those policies. Also, the approved MTW Supplement and all required attachments and documents should be available for review and inspection at the PHA's principal office during normal business hours.

If you have any questions please contact R. Fatima Garland, Portfolio Management Specialist, at (313) 234-7345 or via e-mail at Roelisha.F.Garland@hud.gov.

Sincerely,

X

A handwritten signature in cursive script, appearing to read "Douglas C. Gordon".

For Douglas C. Gordon, Director
Detroit HUD Field Office of Public Housing
Signed by: RATICO LAKE

CC: John Concannon, MTW Program Director, John.M.Concannon@hud.gov
Joseph Russell, MTW Desk Officer, JOSEPH.R.RUSSELL@hud.gov

ANN ARBOR HOUSING COMMISSION

MTW HARDSHIP POLICY – MULTIPLE ACTIVITIES

The PHA has a written policy for determining when a requirement or provision of a program regulation or MTW activity constitutes a financial or other hardship for the family. This hardship policy is applicable for MTW HCV households as well as non-MTW HCV households.

The policy applies to the follow MTW activities: SAFMR Payment Standard, and FMR Payment Standard. In addition, to the MTW activities the policy applies the non-MTW minimum rent waiver and repayment agreement policy, in accordance with HUD regulation.

PHA Policy

The PHA will review its hardship policy(s) with residents during its intake, and recertification processes. The resident must sign and submit consent forms for obtaining information requested by the PHA necessary to consider if a resident qualifies for a hardship exemption.

The PHA will determine if a resident qualifies for a hardship exemption under the following circumstances:

1. At the time of a potential termination of assistance that is due to an MTW activity
2. When a resident request a hardship exemption from a required MTW activity

The PHA will suspend the activity for the household, beginning the next month after the request, until the PHA has determined if the request is warranted. The PHA shall make determination of whether a financial or other hardship exists within thirty (30) days after the family's request.

Hardship Standard

The PHA will determine what constitutes a hardship. A family may request a hardship for the following circumstances. The family must experience a decrease in income because of changed circumstances, family emergency, divorce, or natural disaster:

1. Loss or reduction of employment
2. Loss of income due to death of the head, spouse, or co-head
3. Reduction in or loss of earnings or other benefit income
4. Awaiting approval for benefit income
5. Such other situations and factors as determined by the agency to be appropriate, such as eviction, termination of utilities, or wage garnishment, divorce, natural disaster, or family emergency.

Exemption Period

If it is determined a qualifying hardship does not exist, the MTW activity will resume. Any amounts owed to the PHA due to the suspension of the MTW activity will be collected through a reasonable repayment agreement.

When a family's request for a financial hardship exemption (other than alternative reexamination schedule) is granted, the PHA will remove the family from the MTW initiative for a period of 6 months.

The hardship will be reassessed on **the earlier of** the next scheduled biennial recertification or within 6 months from the date the hardship was approved.

The hardship period ends when at an interim or annual reexamination, the family's calculated MTW TTP is greater than the TTP as calculated under the hardship exemption.

For a minimum rent hardship exemption based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

If the family disagrees with the denial of a hardship request, the family is entitled to and may request an informal hearing.

Reasons of Denial

Hardship request may be denied for the following reasons:

1. Failure to provide verification for loss or reduction of benefit income
2. Failure to provide verification for eligibility of benefit income
3. Failure to provide verification of increased expenses
4. Family is not subject to eviction, utility shut off, or wage garnishment
5. Failure to submit verification for decrease or loss of employment
6. Failure to provide supporting documentation related to loss of income due to death by head, spouse, or co-head
7. Failure to provide supporting documentation related to divorce, natural disaster, or family emergency.

Grievance Procedure

A family may request for second level review of denied hardship requests. The family must submit a request in writing within 30 days the of the PHA written notice.

Reporting

The PHA will keep of all hardship requests received and the results of these requests and supply them at HUD's request. Requests related to the PHA's MTW status will be retained for the duration of PHAs participation in the MTW demonstration program and will be available for public review and inspection at the principal office location during normal business hours.

SAFMR AND FMR Payment Standard Impact Analysis

This analysis must consider the following factors, as applicable:

<p>MTW Activity: Reasonable Rent Policy (2.a.) Payment Standard – SAFMR and (2.b.) Payment Standard FMRs</p> <p>2.a. The agency is authorized to adopt and implement any reasonable policy to establish payment standards based up Small Area Fair Market Rents (SAFMR) and Fair Market Rents (FMR).</p> <p>2.a.i. Payment standard must be between 80% and 150% of the SAFMR.</p> <p>2.b.i. Payment standard must be between 80% and 120% of the FMR</p>
<p>Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution);</p> <p>AAHC does not anticipate that the implementation of these waivers will have a significant impact on staff time. Initial calculations regarding HAP and payment standards for affected families may require a bit more time from our financial staff during the first stages of implementation, but we predict that these effects will be lessened as we continue to issue vouchers using SAFMR and newly adjusted payment standards over time.</p> <p>Average HAP contributions from AAHC will likely increase following the implementation of this waiver. The adoption of new payment standards according to SAFMR will allow for HCV families to move into more desirable, higher opportunity, and more expensive areas of our community.</p>
<p>Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs);</p> <p>AAHC does not anticipate an increase how much affected families will pay toward their housing cost.</p>
<p>Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist);</p> <p>Although it is hard to determine, we anticipate there will be no change in the amount of time families are on the waiting list. AAHC will monitor this activity closely to determine its impact.</p>
<p>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);</p> <p>Although it is hard to determine, we anticipate there will be no change in the number of families that are terminated. AAHC will monitor this activity closely to determine its impact.</p>
<p>Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program;</p> <p>AAHC anticipates that the implementation of these waivers will increase our HCV utilization rate. We expect to increase our number of HCV units following implementation, and therefore similarly expect our utilization rate to increase.</p>
<p>Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice;</p> <p>Implementation of the activity is cost effective because it reduces administrative burden and improves efficiency. This activity supports the MTW statutory objective of increasing housing choice.</p>
<p>Impact on the agency’s ability to meet the MTW statutory requirements;</p>

This activity does not impact our ability to ensure that 75% of all new admissions are very low-income. AAHC will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation.

In addition, AAHC will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact of the agency ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards.

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

AAHC does not anticipate an impact on the number of hardship requests, granted or denied. AAHC has established a hardship policy. We anticipate no more than 10% of assisted families will request a hardship. AAHC will grant all requests that meet the eligibility criteria and deny all others. Overall, AAHC does not anticipate the rate of hardships having a significant impact on the agency or participating families.

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

AAHC can ensure there will not be an impact on protected classes or any associated disparate impact. The agency will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected bases. The agency's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities, and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

MTW Supplement Plan Public Comment

Section B.7 Resident Advisory Board

The Resident Advisory Board (RAB) held on October 18, 2023

This annual public, meeting of the Resident Advisory Board focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program as a member of Cohort #4— Landlord Incentives.

ATTENDEES:

DISCUSSION:

2072 Garden Circle Section 18 Demolition/Disposition

Landlord Incentives

AAHC is a participant in Moving To Work Cohort #4— Landlord Incentives. Participation in this cohort provides AAHC the opportunity to adopt policies that incentivize landlord participation in the Section 8 Voucher program. AAHC plans to provide damage loss payments, signing bonuses, and vacancy loss payments to landlords that rent to Section 8 Voucher participants. AAHC also plans to assist participants with providing security deposits and paying application fees.

The Ann Arbor Housing Commission discussed the Final Rule implementing Sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) regulation changes for future adoption, with the Resident Advisory Board:

Section 102: Income Reviews

Fewer Interim Reexaminations: HOTMA creates a 10% adjusted income increase/decrease threshold for conducting Interim Reexaminations, and in most cases requires that increases in earned income are not processed until the next Annual Reexamination, allowing families to keep more of their earnings before receiving a rent increase. The new requirements should lead to fewer Interim Reexaminations overall, alleviating burden for both participants and PHAs.

Streamlined Verifications: Several provisions will streamline the verification process for housing providers.

Adults Only Need to Sign Consent Form Once: HOTMA revises the required consent form that all adult household members sign, allowing them to sign the form only once instead of annually.

Use of Income Determinations from Other Programs: HOTMA allows PHAs to use income determinations made under other federal benefits programs for reexaminations.

Review of EIV Not Required at Interim Reexamination: HOTMA eliminates the requirement for PHAs to use EIV to verify tenant employment and income information during an interim reexamination, significantly reducing administrative burden.

Increased Standard Deduction for Elderly/Disabled Households: HOTMA increases standard deductions for families with a head, co-head, or spouse who is elderly or a person with a disability.

Additional Income Exclusions: The rule codifies additional income and asset exclusions, including:

- Amounts received from Medicaid or other state/local programs meant to keep a family member with a disability living at home
- Veterans' aide and attendant care
- Distributions of principal from non-revocable trusts, including Special Needs Trusts.

Threshold for Claiming Medical/Disability Expenses Increased: HOTMA increases the allowance for unreimbursed health and medical care expenses from 3% of annual income to 10%, phased-in over two years.

Higher Threshold for Imputing Asset Income: HOTMA raises the imputed asset threshold from \$5,000 to \$50,000, incentivizing families to build wealth without imputing income on those assets.

Hardship Relief: HOTMA provides hardship relief for expense deductions, lessening the impact of the increased threshold for medical expenses. HOTMA permits PHAs to grant hardship relief to families unable to pay rent because of unanticipated medical/disability expenses and families who are no longer eligible for the childcare expense deduction.

Section 103: Public Housing Income Limit

Public Housing Income Limitation: HOTMA imposes continued program participation limits for families exceeding the statutory income limitation in the Public Housing *program, also known as the "over-income" provision.

Section 104: Asset Limits

Asset Limitation: HOTMA imposes a \$100,000 asset limit for eligibility and continued assistance. Families are also ineligible for assistance if they own real property suitable for occupancy. PHAs have the option of delaying enforcement/termination for up to six months if the family is over the asset threshold at the time of annual reexamination.

Exclusion of Retirement and Educational Savings Accounts: Retirement accounts and educational savings accounts will not be considered a net family asset. This is a major benefit to families, incentivizing savings for important life milestones and opportunities. This will also provide significant administrative relief to PHAs by allowing them to stop verifying and calculating these assets altogether.

Self-Certification of Assets under \$50,000: HOTMA allows self-certification of net assets if estimated to be at or below \$50,000. This will be a time-savings for families and lower administrative burden for PHAs recertifying income.

Cross-Cutting

Adjustments for Inflation: Deductions and the asset limitation will be adjusted for inflation annually, ensuring that deductions do not lose value over time and that families are able to build

more wealth without losing program assistance. The current deduction amounts have never been adjusted.

Resident Advisory Board Discussion: None

OTHER RESIDENT INPUT:

Upthegrove: Mentioned that increase the voucher subsidy would be helpful to program participants. She mentions that she needs a six-bedroom house and that there very little housing options available to participants. Asked if her voucher amount would increase because she's adding another member to the household?

Response: Voucher are issued for one bedroom for every two people in the household. You caseworker can provide specific detail regarding your household.

Ragay: Asked what is the average wait on the programs waiting list?

Response: The average wait is 4 to 6 years for our Affordable Housing or Housing Choice Voucher waiting list.

Ragay: Mentioned that her son has applied for the waiting list. He is currently homeless and needs his own place.

Response: please contact AAHC staff for a more detailed response.

Section B.7 Public Meeting:

The Public Meeting held on January 10, 2024

This public meeting focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program Supplemental Plan, Hardship Policy, Rent Reform, Agency Specific Waivers, and Safe Harbor.

ATTENDEES: [REDACTED]

DISCUSSION:

MTW agencies must work closely with their residents and stakeholders when developing the Agency-Specific Waivers; therefore, similar to submitting Safe Harbor Waivers, when submitting an Agency-Specific Waiver, the MTW agency must not only follow the PHA Plan public process requirements, but it must also have an additional public meeting to specifically discuss the Agency-Specific Waivers.

The Ann Arbor Housing Commission discussed implementing several MTW activities to establish a reasonable rent policy. The following MTW activities were proposed for implement effective no later than January 1, 2025. Minimum Rent at \$130 except for elderly and disabled households. Tenant Payment as a Modified Percentage of Income. We propose to change the total tenant payment (TTP)

from 30% of adjusted median income to 15% of adjusted median income. Setting the TTP at 15% is below the allowable maximum of 32% as stated in the Operations Notice. We will request a safe harbor to include elderly and disabled households to benefit from this activity.

In addition, we propose to eliminate Utility Reimbursements payment when the utility allowance is greater than the total tenant payment. The agency proposed to eliminate deductions for \$480 dependent, and \$400 elderly, and disabled deductions for households that are not elderly or disabled. We proposed to implement MTW activity Alternative Income Inclusions/Exclusions to exclude wages for household members between the age 18-23. We will request a safe harbor to include elderly and disabled households to benefit from this activity.

Also, we propose to establish a Payment Standard based on the Small Area Fair Market Rent where allowed and establish grouped zip code when applicable. The payment standard will be between 80% and 150% of the SAFMR. AAHC will also establish a Payment Standard between 80% and 120% of the Fair Market Rent for all other areas. Lastly, we propose to establish an Alternative Reexamination Schedule for households on a biennial (every two years) basis. Households are allowed at least one interim adjustment per year at the request of the household if the gross income has decreased 10% or more. AAHC will complete an impact analysis that is required for all MTW activities. We will establish a hardship policy required for all applicable MTW activities.

Resident Advisory Board Discussion: None

OTHER RESIDENT INPUT:

Ryder: asked why 48108 is not included in the SAMFR and why we don't service Belleville?

Response:

- 48108 is already at the affordable income level.
- We don't service Belleville due to 6 other agencies already servicing them.
- The higher subsidy at would apply next recert.

Kennedy: asked is the deduction applied to each household member?

Response:

- A household will receive a deduction for each qualifying household member

Lewis: why would they want to eliminate the disability deduction?

Response:

- Eliminating deductions streamlines the recertification process
- Reduces administrative burden

Silas: how many clients pay the minimum rent or \$0- \$50 as their tenant portion of rent?

Response:

- Less than 10% of program participants pay the minimum rent or less.

Pace: could AAHC make utility reimbursement payments to the utility provider instead of to the tenant?

Response:

- Regulations allows AAHC to make payment to utility provider however the PHA must determine a percentage to pay for each utility type.

- AAHC has researched these options and determined the administrative burden is beyond our capacity to manage.

Kennedy: asked how often are participants required to complete the annual recertification?

Response:

- Currently, participants are required to recertify once a year.
- We are proposing to require household to recertify once every two years
- Participants are invited to complete their annual recertifications at least 120 days prior to the annual recertification date.

Kennedy: how would that impact a change or if a family wants to move?

Response:

- Families are allowed to report reductions in income or changes in household composition.
- You must contact your Occupancy Specialist to receive instructions to relocate.

Gilbert: if a participant become employed, does the tenant portion of rent increase?

Response:

- In some circumstances, the tenant portion of rent may increase however it is based on the amount of income and other factors. Please contact your Occupancy Specialist for more assistance.

Lewis: how do you determine what percentage of a building will receive project-based vouchers.

Response:

- It is determined by the need of the community, the availability of funding and vouchers, and a request for proposal process.

Wilcox: if the minimum rent is increased to \$130 and the utility reimbursement is eliminated how would this impact those households who are zero income?

Response:

- We anticipate those households would be impact having a seek resources to pay rent or utilities.
- We also anticipate that a reduction in tenant rent payment as a modified percentage of income being reduced from 30% to 15% will encourage household to increase their income and pay less of their income towards rent and utilities.
- AAHC has implemented a minimum rent hardship policy for those who are impacted.
- Elderly and disabled households would be exempt from the \$130 minimum rent.

Ryder: asked if IRA's considered an asset or income?

Response:

- An IRA is considered an asset. When an IRA is withdrawn it may be considered income.

Ryder: mentioned that AAHC staff should meet with participants in person to stress the benefits of any program changes.

Response:

- We ensure that we communicate our policies, programs, meetings, and events with participants by multiple means of communication such as public meetings, in person, by phone, email, mail, and social media.

Section B.7 Public Meeting:

AAHC Rise Hope Partner Meeting held on January 11, 2024

ATTENDEES: [REDACTED]

This public meeting focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program Supplemental Plan, HOTMA, Hardship Policy, Rent Reform, Agency Specific Waivers, and Safe Harbor. The Ann Arbor Housing Commission discussed implementing several MTW activities to establish a reasonable rent policy. The MTW activities were proposed for implement effective no later than January 1, 2025.

Lapides: Inquired if the HOTMA regulations and MTW activities are applied to all housing authorities?

Response: the HOTMA regulation changes are applicable to all PHAs with HCV and Public Housing programs. Some HOTMA regulations are optional to PHA's, however each PHA is required to implement the new regulations no later than January 1, 2025. MTW activities are specifically to agencies designated as MTW. All proposed MTW activities are specific to the Ann Arbor Housing Commission.

Section B.7 Public Meeting:

AAHC Board Meeting held on March 20, 2024

ATTENDEES: [REDACTED]

This public meeting focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program Supplemental Plan, HOTMA, Hardship Policy, Rent Reform, Agency Specific Waivers, and Safe Harbor. The Ann Arbor Housing Commission discussed implementing several MTW activities to establish a reasonable rent policy. The MTW activities were proposed for implement effective no later than July 1, 2025. The MTW activities described included: Payment Standard based on SAFMR, Rent Reform, Minimum Rent, Utility Allowance, Alternative Reexamination, Allowable Deductions, Tenant Payment as a Modified Percentage of Income, Income Inclusion/Exclusions.

The following HOTMA changes were described and suggested for immediate implementation: Self-certification of assets up to \$50,000, revised HUD form 9886-A, use income determinations from other means-tested federal public assistance programs to verify annual income, Level 4 documentation (Written Third-Party Verification) to include an original or authentic document generated by a third-party source dated within 120 days of the date received by AAHC, rather than 60 days as is currently required, accept a statement dated within the appropriate benefit year for fixed income sources, and acceptable documentation of SSN. All other HOTMA changes will be adopted in accordance with HUD guidance no later than January 1, 2025, upon completion of HUD system HIP, updated HUD form 50058, and the AAHC's property management software Yardi.

Boer: Inquired if by implementing biennial reexaminations will tenants sign a lease agreement biennially as well?

Response: The tenant lease and biennial reexaminations are two separate documents initiated by two separate authorities (owner and PHA), to initiate two separate activities. The owner (landlord) authorizes renewal of the lease as related to a household's tenancy. Whereas, the reexamination is initiated by the PHA (AAHC) to determine continued eligibility of assistance. As result, the owner will dictate the lease terms and may not be in coordination with the biennial reexamination.

Jenkins: Mentioned that reducing the tenant payment as a modified percentage of income from 30% AMI to 15% AMI is significant and likely to benefit several households.

Batalonga: Inquired of increasing the minimum rent from \$50 to \$130 and it's impact on extremely low income and zero income households.

Hall: Expressed that the minimum rent activity warrants more conversation with program participants and local nonprofits. Hall inquired how many households would be impacted.

Response: Data shows around 17% of households may be impacted by increasing the minimum rent. AAHC will ensure to communicate to current program participants of this policy change by mail, email, website, and flyer. AAHC plans to continue to hold public meetings with participants to discuss this topic and other policy changes for the next 12 months prior to implement any MTW activities. Participant will be informed how this change may impact them, what steps to take if they experience hardship, and AAHC will continue to work with community providers to coordinate support services as needed.

Weber: Inquired about household income calculations, what percentage of participants are non-compliant. What measures will be taken if a household if found non-complaint.

Response: It is estimated that less than 10% of participants have un-reported or under reported household income. AAHC continues to utilize systems such as EIV to identify income discrepancies. We expect that excluding wages of household members between ages 18-23 will significantly reduce the number of income discrepancies. AAHC will take action to recover housing assistance overpayments.