

PHA Name : Brattleboro

PHA Code : VT002

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 4/1/2024

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Since becoming an MTW agency BHP has worked tirelessly to implement the waivers we have already requested during our first two years. We started with small changes and feel that was a wise choice and has allowed us to develop programs that positively impact those we serve and our community.

The changes we made so far are: moving our recertification process for tenant rent calculations to every third year rather than annually; allowing self certification for family assets under \$50,000; conducting HCV inspections triennially, and redefining our FSS program by creating LEAP (Learning Employment Academic Program) for those we serve. All of these changes are being implemented and will help improve the lives of those we serve as well as being more efficient with our staff resources.

Using the flexibility allowed to us as a MTW agency we will continue to work in the short term to reduce administrative inefficiencies. We will continue to look for ways to improve the lives of those we serve by working with them to help us truly understand barriers to their success.

Our long term goal is to create systems that better address the needs of those we serve and the larger community. This includes better opportunities for those we serve, optimal use of BHP staff and resources, and partnerships with those who also serve our community. We are committed to working with community partners and other resources to create more housing options in this community. The changes we hope to make during 2024 will continue to serve our community and those we serve directly.

During 2024 we will be addressing two of the three statutory requirements of the MTW program: increased housing options; and incentives for increased self-sufficiency by residents.

Housing Options: We will increase housing options in two ways. One is by making changes to our Project Based Voucher program – eliminating the cap on specific projects; increasing the overall cap to 50%; extending the program to manufactured homes; and extending the contract term.

We will also offer landlord incentives. We are lucky to have landlords who continue to work with us. One of the ways they do this is by keeping rents affordable and being willing to take a chance renting to someone who may not have a stellar rental history. We propose giving an additional months' rent to those who continually renew leases for HCV holders. We also feel it is important to make it easier for those landlords who are willing to keep their rents affordable for those with Housing Choice Vouchers. Landlords can lose monthly rents for a variety of reasons. We will offer vacancy loss payments in specific instances.

Increasing self-sufficiency: Incentives to Families: Currently any amount of student financial aid that is not used for direct student expenses (books, tuition, housing) is considered income for family rent calculation purposes. We understand that being a college or other secondary student, and the family of such a student, is stressful and there are many unanticipated expenses. We propose to exclude all financial aid (work study, grants, scholarships, loans, etc.) from the family's income for rent calculations. Costs are particularly high in Vermont - tuition is high, as are living expenses. Many of our students in college might be first generation (this is true of both traditional age students and adult students) and they are in particular need of additional support that may not be direct student costs. Their families are also already experiencing poverty. In addition to all the regular support and expenses to the family as a whole, they are also giving additional support to a family member who is trying to get an education – either a child or an adult family member. We believe this should be rewarded and given as much support from BHP as possible. One of the things we can do is not count any financial aid that comes to the student as income for rent calculation purposes. These same pressures exist for those who are pursuing other secondary education offerings.

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)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
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)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
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)	Currently Implementing
6. Short-Term Assistance	
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	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)	Plan to Implement in the Submission Year

b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
f. Increase PBV HAP Contract Length (HCV)	Plan to Implement in the Submission Year
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)	Currently Implementing
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Currently Implementing
c.PH Alternative Family Selection Procedures (PH)	Currently Implementing
c.HCV Alternative Family Selection Procedures (HCV)	Currently Implementing
d.PH Modify or Eliminate the Contract of Participation (PH)	Currently Implementing
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Currently Implementing
e.PH Policies for Addressing Increases in Family Income (PH)	Currently Implementing
e.HCV Policies for Addressing Increases in Family Income (HCV)	Plan to Implement in the Submission Year
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Was Discontinued in a previous Submission Year
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. Housing Development Programs	Not Currently Implemented

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

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 Currently any amount of student financial aid that is not used for direct student expenses (books, tuition, housing) is considered income for family rent calculation purposes. We understand that being a college or trade school student, and the family of such a student, is stressful and there are many unanticipated expenses. We propose to exclude all financial aid (work study, grants, scholarships, loans, etc.) from the family's income for rent calculations. Costs are particularly high in Vermont - tuition is high, as are living expenses. Many of our students in college or trade school might be first generation (this is true of both traditional age and adult students) and they are in particular need of additional support that may not be direct student costs. Their families are also already experiencing poverty. In addition to all the regular support and expenses the family is also giving additional support to the family member who is trying to get an education – either a child or an adult family member. We believe this should be rewarded and given as much support from BHP as possible. One of the things we can do is not count any financial aid that comes to the student as income for rent calculation purposes. This action will lead to more self sufficiency of our residents as they are able to potentially save money for other necessities. It will also act as an encouragement to those who might be contemplating continuing their education.
Which of the MTW statutory objectives does this MTW activity serve? Self-sufficiency
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? Any income from student financial aid of any kind that is not used for direct education purposes will be excluded from the family's income for rent calculation purposes.

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 Currently any amount of student financial aid that is not used for direct student expenses (books, tuition, housing) is considered income for family rent calculation purposes. We understand that being a college or trade school student, and the family of such a student, is stressful and there are many unanticipated expenses. We propose to exclude all financial aid (work study, grants, scholarships, loans, etc.) from the family's income for rent calculations. Costs are particularly high in Vermont - tuition is high, as are living expenses. Many of our students in college or trade school might be first generation (this is true of both traditional age students and adult students) and they are in particular need of additional support that may not be direct student costs. Their families are also already experiencing poverty. In addition to all the regular support and expenses to the family as a whole, they are also giving additional support to a family member who is trying to get an education – either a child or an adult family member. We believe this should be rewarded and given as much support from BHP as possible. One of the things we can do is not count any financial aid that comes to the student as income for rent calculation purposes. In terms of a larger initiative it will not only allow families to save for other necessities but will encourage others to continue their education.
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
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?

Any amount from student financial aid of any kind that is not used directly for education expenses will be excluded from family income for rent calculation purposes.

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

We received the waiver for triennial recertification for the year 2022. For many reasons, staff illnesses, etc., we have just implemented it as of late 2023. All of our residents have completed recertifications during 2023 and we now have a schedule based on housing site. Overall this schedule will contribute to our goal of efficiency in order to allow staff to concentrate less on administrative duties and more on those that directly affect our residents. The schedule for our sites is 2024 - Hayes Court; 2025- Samuel Elliot Apartments; 2026 - Moore Court, Ledgewood Heights. And then the cycle will repeat itself.

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.

As stated we have just completed annual recertifications for all residents and will now begin our three year cycle based on site. The implementation took longer than anticipated due to staff leaves, etc. And it took time to make sure that we had all of our policies and procedures in place so that it was executed in a fair manner We have now conducted recertifications for all residents and they have been put on the three year cycle.

Our cycles are by site and are as follows: 2024 - Hayes Court; 2025 - Samuel Elliot Apartments; 2026 - Ledgewood Heights and Moore Court, and then the cycle repeats itself. Our policy states that when a new resident leases up they will be certified and will then be put into the cycle for their housing site. This may result in some residents having recertifications more than every three years for the first cycle. The same will be true for residents who transfer to a different site - they will be put into the three year cycle for their new site. We do have a hardship policy that has been submitted.

Because we have just fully implemented the waiver we have not yet had any hardship requests.

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

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.

Changes in family composition will trigger a interim examination as is currently done. Decreases in family income will trigger a interim examination if the decrease is 10% or more over more than 30 days or if allowable expenses increase by more than 10% over more than a 30 day period (hardship policy). Increases in income will be reported for informational purposes but will not be used to recalculated the family's portion of the rent during the three year time frame..

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

We received the waiver for triennial recertification for the year 2022. For many reasons, staff illness, etc., we have just implemented it as of late 2023. All of our participants have completed recertifications during 2023 and we will not have a new triennial schedule that will require reexaminations for all HCV in 2026 and again in 2029. As new participants receive vouchers they will be put into the 2024 cycle. This may result in some people requiring recertification more than once very three years until they join the cycle. But they will never go beyond three years. 2024. This initiative contributes to our larger initiative of becoming more efficient and allowing staff to focus less on administrative duties and more on those that directly support our participants.

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

Cost effectiveness

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.

As stated, we have just completed annual recertifications for all participants and will now begin our three year cycle. The implementation took longer than anticipated due to staff leaves, etc. And it took time to make sure that we had all of our policies and procedures in place so that it was executed in a fair manner. All HCV and non RAD PBV were recertified during fall of 2023 so our next recertifications will be done in 2026. As new people are given vouchers they will be certified and will then be put into the three year cycle. This could result in some people being recertified before the initial three years is done but then will be put into the three year schedule. We do have a hardship policy that has been submitted. Because we are just now fully implementing we have not yet had any hardship requests.

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

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.

Changes in family compositions will trigger an interim examination as it currently does. If the change in composition results in a change of income it could result in establishing a new base rent amount. Decreases in family income will trigger an interim examination if the decrease is 10% or more over more than 30 days, or if allowable expenses increase by more than 10% over more than 30 days (hardship policy). Increases in income will be reported for information purposes but will not be used to recalculate the family portion of rent during the three year period.

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

Allowing self certification of assets up to \$50,000 increases efficiency for staff and puts less pressure on residents.

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.

We have just implemented this and have not yet seen any changes or results.

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

No

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

\$50,000.

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

Self certification of assets up to \$50,000 increases staff efficiency and causes less stress for participants.

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

Cost effectiveness

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.

As we just implemented this change we have not yet seen any changes or results.

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

No

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

\$50,000.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)

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

We feel it is important to make it easier for those landlords who are willing to keep their rents affordable so that those with Housing Choice Vouchers can be housed. Landlords can lose monthly rents for a variety of reasons. We will offer vacancy loss payments in the following situations:

- o A one month full contract rent for a vacancy resulting from a delay in making repairs that is beyond the control of the landlord.
- o A one month full contract rent amount for vacancies resulting from those transitioning from a residential treatment program, incarceration, or homelessness.
- o A one month full contract rent resulting from a court ordered eviction.
- o The ability to accept other requests for vacancy losses on a case-by-case basis due to unforeseen circumstances.

Our goal with this incentive is to make sure that landlords continue to be willing to work with us. We believe that in the long run it will allow more housing options as landlords are more willing to work with us.

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

Housing choice

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

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?

Up to one month full 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

Damage claims up to two months contract or actual damages (the lesser) for damages beyond what the security deposit covers. We believe that this will encourage landlords to continue to work with us and will in the end allow for more housing options.

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

Housing choice
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies to all assisted households
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 lesser of one month full contract rent or actual damages beyond the 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
<ul style="list-style-type: none"> We are lucky to have landlords who continue to work with us. One of the ways they do this is by keeping rents affordable and being willing to take a chance renting to someone who may not have a stellar rental history. We propose giving an additional months' full contract rent to those who continually renew leases for HCV holders. We believe that by giving this incentive to landlords it will make sure they are willing to rent to our participants and will result in more housing options.
Which of the MTW statutory objectives does this MTW activity serve?
Housing choice
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies 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 applies to private landlords who do not receive funding from other sources for their rental units.

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's 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.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

We received this waiver in 2022 but for a number of reasons were unable to implement until now. We had originally thought we would contract with the Town of Brattleboro to use their housing inspectors - their inspection actually is more intense and goes beyond the HUD HQS requirements. However this will not work for a number of reasons. Their schedule is every four years - we want to do them every three years;, and they only cover the town of Brattleboro and we have participants in 8 of the surrounding town. We now have a schedule to complete all inspections by September of 2024. We will then go on an every three year schedule. New participants will be done when they enter and then again to fit into the three year schedule. We believe this will have a tremendous impact on our staff efficiency. Although it is not a hardship policy as such an inspection can be requested at any time by the tenant, the landlord, HUD or at our initiative.

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

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

Currently the PBV Program Cap is 20% of units in the ACC. We are asking for a waiver to increase that to 50%. In large part this is due to local housing market practices. As we see more mom and pop type landlords selling their properties,

they are being bought up by conglomerates, many from out of state. As an incentive to them to continue to work with our participants we feel that allowing more PBVs in their holdings will make their costs more predictable and would be a positive step. The advantage to the participant is that with a PBV their income is capped at 30% of their adjusted gross income.

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

Housing choice

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

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

We propose increasing the PBV project cap to 100%. Our area is in a housing crisis - our vacancy rate is about .5. Developing housing in Vermont is difficult for many reasons. In order to entice more development we believe that being able to have PBV for an entire project will increase the likelihood of more development. It will move us in the right direction toward more housing options for those in need.

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

Housing choice

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

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

No

9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (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

With the housing crisis facing this area we need to be more creative in the solutions. Shared housing and manufactured homes have the potential to add to our housing inventory. But we need to be able to subsidize them in creative ways. By offering PBV for these housing options we believe that we will encourage more interest by developers in them where they are appropriate. If successful it will lead to more affordable housing options for those in need.

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

Housing choice

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

No
How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?
2
How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?
0
How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?
2
How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?
0

9.f. - Increase PBV HAP Contract Length (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
Although it seems like a very long time, 50 years, many developers need the assurance and cost predictability for that length of time. We would like to see more large investments into housing in our area but we need to provide some assurances to the developers. We are losing our community based mom and pop landlords to larger, many out of area, developers and landlords. They may need more assurances because they are not used to working with us and because they are not a part of the community. We believe that it will result in more housing options in the future.
Which of the MTW statutory objectives does this MTW activity serve?
Housing choice
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies to all assisted households
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No

10.b.PH - Alternative Structure for Establishing Program Coordinating Committee (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
We received the waiver for this for the year 2023. We have completely revamped our FSS program and are using existing community board and committees to serve this purpose. It increases our efficiency by not having staff organize and chair yet another committee. It is also a time and energy saver for our community partners.
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.

Our FSS (LEAP) Coordinator has increased the number of community association meetings he is able to attend by not having to have this specialized committee for this one purpose. It has increased his presence in the community and has created more lasting community partners. Our community partners are happy to not have yet one more meeting to attend when the existing ones can well satisfy this requirement.

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.

Please describe the alternative structure and how it is designed to secure local resources to support an MTW Self-Sufficiency program.

We are now making better use of community partners time and our own staff time. As a result of attending already existing meetings better coordination is happening with the community partners.

10.b.HCV - Alternative Structure for Establishing Program Coordinating Committee (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

We received the waiver for this for the year 2023. We have completely revamped our FSS program and are using existing community boards and committees to serve this purpose It increases our efficiency by host having staff organize and chair yet another committee. It is also a time and energy saver for our community partners.

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

Cost effectiveness

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 FSS (LEAP) Coordinator has increased the number of community association meetings he is able to attend by not having to have this specialized committee for this one purpose. It has increased his presence in the community and has created more lasting community partners. Our community partners are happy to not have yet one more meeting to attend when the existing ones can well satisfy this requirement.

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.

Please describe the alternative structure and how it is designed to secure local resources to support an MTW Self-Sufficiency program.

We are now making better use of community partners time and our own staff time. As a result of attending already existing meetings better coordination is happening with the community partners.

10.c.PH - Alternative Family Selection Procedures (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

Waiver 10 has allowed us to restructure our FSS program to better meet the needs of our participants and the community. Our program is now called LEAP (Learning Academic Employment Program). While our past FSS program was completely voluntary, with LEAP we are mandating all residents 18-55 to participate. Those who are 55 and older or are disabled or the primary care giver for a blind or disabled person are exempt, but may participate if they want to.

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.

We received final approval of the waiver in June 2023. We then amended our FSS Action Plan which was approved. We developed all the policies and procedures for exactly how this would work, how it would interface with Property Management, researched and installed a new software case management system (Apricot) and began to inform our residents. We offered options to those few people who were participants in the previous version of FSS. There were only five active participants - all chose to go to the new LEAP program. Because it is now mandatory, we needed to make sure that every resident was aware of the consequences of non participation so we developed a voucher addendum that was signed by all current residents and new ones as they leased up. It made them aware of the expectations and consequences. With all this done we were able to "go live" in mid October and started meeting with residents to sign the COP and the goal plan. Between mid October and end of November we had 27 residents sign up. Between this and HCV we have about 140 residents who will be required to participate. The Coordinators goal is to have them all enrolled and working on their plans by fall of 2024.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

Please describe the purpose and goals of the alternative contract or locally developed agreement, and/or the MTW agency's motivation for developing its own contract or agreement.

The existing contract and selection process simply did not meet the needs of our residents and did not seem to align with the general needs in our community. By changing the COP and requiring all to participate (exempt with hardship policy) we feel that our residents needs will be much better met.

10.c.HCV - Alternative Family Selection Procedures (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

Waiver 10 has allowed us to restructure our FSS program to better meet the needs of our participants and community. Our program is now called LEAP (Learning Employment Academic Program). While our past FSS program was completely voluntary, with LEAP we are mandating all participants 18-55 to participate. Those who are 55 and older or are disabled or the primary caregiver for a blind or disabled person are exempt, but may participate if they want to.

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.

We received final approval of the waiver in June 2023. We then amended our FSS Action Plan which was approved. We developed all the policies and procedures for exactly how this would work, how it would interface with Property Management, researched and installed a new software case management system (Apricot) and began to inform our residents. We offered options to those few people who were participants in the previous version of FSS. There were only about 2 of them and they both went with the new program. Because it is now mandatory, we needed to make sure that every resident was aware of the consequences of non participation so we developed a voucher addendum that was signed by all current participants and new ones as they received a voucher. It made them aware of the expectations and consequences. With all this done we were able to "go live" in mid October and started meeting with residents to sign the COP and the goal plan. Between mid October and end of November we had 27 residents sign up. Between this and HCV we have about 140 residents who will be required to participate. THE Coordinator's goal is to have them all enrolled by fall 2024.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

Please describe the purpose and goals of the alternative contract or locally developed agreement, and/or the MTW agency's motivation for developing its own contract or agreement.

The existing contract and selection process simply did not meet the needs of our participants and did not seem to align with the general needs in our community. By changing the COP and requiring all to participate (exempt with hardship policy) we feel our participants needs will be much better met.

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

The Contract of Participation was developed to meet the needs of a traditional FSS program. Because we changed our program - required participation, no escrow, incentive payments/grants, six year COP, etc - it no longer met the needs of our program. The changes that were made reflect the new program - LEAP - and are much more informative for the participants and easier to understand. It does not feel so daunting to the 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 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.

Other – another specifically defined target population or populations.

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

Everyone between the ages of 18-54 must participate. Elderly, disabled or those who are primary care giver for a disabled or blind person are exempt. But even if a head of household is disabled those in the household who are not disabled and between 18-54 must participate. So it applies to all families, just not all individuals.

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 policy was approved in 2022 and has just been fully implemented. It is too early to evaluate and know any accomplishments. But between full implementation in mid October and the end of November 27 participants had enrolled. We anticipated having to do very active outreach but rather residents are approaching the Coordinator and looking to enroll.

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

10.d.HCV - Modify or Eliminate the Contract of Participation (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

The COP was developed to meet the needs of a traditional FSS program. Because we changed our program - required participation, no escrow, incentive payments/grants, etc. - it no longer met our needs. The changes that were mad reflect our new program - LEAP - are much more informative for the participants and easier to understand. It does not feel so daunting to the 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 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.

Other – another specifically defined target population or populations.

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

Everyone between ages 18-54 must participate. Elderly, disabled or those who are primary care giver for disabled or blind person are exempt. But even if a head of household is disabled, those in the household who are not disabled and are between 18-54 must participate. So it applies to all families, but not all individuals.

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

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

10.e.PH - Policies for Addressing Increases in Family 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

By aligning our recertification process and our LEAP program we will not count increases in family income until the triennial recertification which will coincide with their three year goal plan. For record keeping purposes, residents must still report income increases but they will not be used for rent calculation purposes. We believe that this will help people to become more self-sufficient, will give them a bit more income to meet current unmet needs and will help improve the quality of their lives. This contributes toward our long term goal of helping residents become more self reliant. The LEAP Coordinator will work with them around budgeting to help them wisely use this increase in funds.

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.

Having just fully implemented both the triennial recertification process and the LEAP program we have not yet seen any results.

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?

Provided Already

How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?

Any increases in family income will not be used for rent calculations during the three year recertification period.

10.e.HCV - Policies for Addressing Increases in Family Income (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

By aligning our recertification process and our LEAP program we will not count increases in family income until the triennial recertification which will coincide with their three year goal plan. For record keeping purposes, residents must still report income increases but they will not be used for rent calculation purposes. We believe that this will help people to become more self-sufficient, will give them a bit more income to meet current unmet needs and will help improve the quality of their lives. This contributes toward our long term goal of helping residents become more self reliant. The LEAP

Coordinator will work with them around budgeting to help them wisely use this increase in funds.

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.

Since we have just fully implemented the triennial recertification we have not seen any results yet.

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?

Provided Already

How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?

Any increase in family income will not be used for rent calculations during the triennial recertification cycle.

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	\$70,077	\$52,564	\$17,513	
2024	\$2,458	\$0	\$2,458	

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.
<p>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? No</p> <p>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline. At this point we are not ready to address full rent reform. We do have a policy that increased incomes during the three year recertification cycle and participation in LEAP will not increase rent. This does work toward encouraging employment and self-sufficiency.</p>	

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.	# 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.	# 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.	
<p>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.</p>		
Family Size:	Occupied Number of Local, Non-Traditional units by Household Size	
1 Person		
2 Person		
3 Person		
4 Person		
5 Person		
6+ Person		
Totals	0	

H.	Public Comment	
<p>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.</p>		

I.	Evaluations.	
<p>No known evaluations.</p>		

BHP RESPONSES TO PUBLIC COMMENTS

The RACC discussed the new MTW supplemental plan. There was just a general discussion but no suggestions for changes or negative comments on the changes.

MTW CERTIFICATIONS OF COMPLIANCE**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (04/01/2024 _____), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Brattleboro Housing Authority

VT002

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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

Elizabeth Harrison

Board of Commissioners Chair

NAME OF AUTHORIZED OFFICIAL

TITLE

Elizabeth R. Harrison
SIGNATURE

Jan 8, 2024
DATE

*** Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.**