

PHA Name : Brighton

PHA Code : CO019

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2022

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Due to the on-going community impact because of the COVID-19 pandemic, and with the winding-down of alternative supportive programs, BHA has had to refocus its MTW plan to account for changing circumstances. As a result, a different strategy has been proposed with the agency's MTW flexibilities.

At the height of the COVID-19 pandemic, BHA was able to secure substantial relief funds and has had great success in delivering those funds to those most in need. As a PHA with great access to the most vulnerable populations experiencing housing instability or insecurity, BHA expanded internal capacity to offer a wider array of services than traditionally offered by a non-MTW program. The flexibilities offered under MTW have provided a method to continue to build upon providing those services to the greater Brighton community beyond the families already served by the HCV program.

In conjunction with the Tenant-based Rental Assistance program supported by Adams County grant funding, the BHA services department is seeking to expand the scope of their work in transitioning families off of subsidy-supported rental assistance and move them into self-supported affordable rental markets. Under the Adams County funded grant, current HCV holders or the public at-large are unable to access those services fully. By reallocating a portion of the Housing Assistance Payment (HAP) funds to supportive services, BHA's position and ability to transition families off of subsidy programs is strengthened. HAP funding will remain adequate to support substantially the same number of families assisted prior to the MTW conversion, and there is even sources of funds dedicated to the release of additional vouchers to bring new families onto the HCV program.

Beyond the enhancing of the services department to provide direct services, BHA is proposing some modifications to some HCV standard deductions and revisions to income inclusions and exclusion. The current proposal would see the creation of an educational deduction for the Head of Household (HOH). In addition, the feasibility of providing a partial income exclusion to non-HOH adult workers is being explored and proposed at this time.

The 2022 MTW Plan Supplement also re-affirms the agencies commitment to the objectives proposed and board-approved under what would have been the 2021 MTW Plan Supplement.

To achieve greater cost effectiveness in federal expenditures the PHA has proposed the simplification of utility allowance schedules, the elimination of utility reimbursements, the elimination of the third-party requirement for rent reasonableness, and alternative reexamination schedule for elderly or disabled families, self-certification of assets under \$25,000, and the elimination of the third-party requirement for HQS inspections.

To give incentive to families who are either working, seeking work, or participating in job training, funds reallocated from HAP to services would support those families as well as the creation of a new income partial exclusion.

In the realm of housing choice, the PHA seeks to increase the PBV program cap, increase the PBV project cap, and eliminate the PBV selection process. These waivers, although not expected to be used immediately, would further enhance the PHA's ability to support the establishment of affordable housing in an extremely tight rental market.

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)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
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)	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)	Plan to Implement in the Submission Year
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
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)	Plan to Implement in the Submission Year
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)	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)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
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	Plan to Implement in the Submission Year

C. MTW Activities Plan that Brighton Plans to Implement in the Submission Year or Is Currently Implementing**1.j. - Alternative Utility Allowance (HCV)**

This activity would consolidate the four current schedules down into just two resulting in greater participant understanding of how the utility allowance works and how to better search for approvable units. The consolidation would also reduce the possibility of administrative errors in applying the wrong schedule resulting in under or over payment of subsidy. The consolidated schedules would still retain the bedroom count and utility type factors. Schedules would be based on either the average of property type (general families in the jurisdiction at a variety of sites) or on site-specific high efficiency utilities (for the modern senior properties). Since the consolidated schedules are based on averages, it is anticipated to have minimal cost implications.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This is the first year for this being implemented.

No hardship were requested in the most recent fiscal year.**In the prior year, under this activity, Brighton MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The calculations would be the average of the three units types for families (single family home, duplex, and multi family). For seniors at high energy efficiency properties, the schedule would be derived from average annual usage studies adjusted for annual anticipated cost factor adjustments.

The agency will review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency will maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.

The agency will not include items in the utility schedule that are excluded under HUD regulations.

1.n. - Utility Reimbursements (HCV)

This waiver would end the issuance of utility reimbursements for families. By eliminating URPs for families in most circumstances, this would create a minimum level of self-sufficiency not captured under current regulations.

This waiver will only apply when the utility allowance is greater than the total tenant payment.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Self-sufficiency

This MTW activity has the following cost implications:

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

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In the prior year, under this activity, Brighton MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

1.w. - Alternative Income Inclusions/Exclusions (HCV)

The PHA proposes to implement a partial income exclusion for non-head of household (or spouse or cohead) adult members between the ages of 18 and 30 where only 75% of their earned income would be used when calculating family share. Historically, this agency has seen adult children cease employment once their income is captured in family share calculations. This is sometimes done since the adult child may drive family share more than the HOH and the household becomes destabilized as the individual members may not contribute at the rate calculated by the PHA. This leaves the HOH oftentimes with the choice of being unable to collect the increase rent share from the adult member, or forcing the adult member to cease employment to return the family share back to the prior lower level. A partial exclusion seeks to preserve the young adults desire to work and build job history and financial resources for establishing an independent unassisted household while still permitting the PHA to capture the majority of the new income when calculating family share.

This MTW activity serves the following statutory objectives:

Self-sufficiency

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

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This is the first year for this being implemented.

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In the prior year, under this activity, Brighton MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Following inclusions or exclusions will be eliminated, modified, or added.

Only 75% of the earned income from non-student, non-HOH (or spouse or cohead), adult between age 18 and 30 will count in calculating family income.

The agency will exempt elderly and disabled individuals from this rent determination policy.

2.d. - Rent Reasonableness – Third-Party Requirement (HCV)

The PHA operates in a smaller jurisdiction and getting a qualified third-party to review and approve the few numbers of properties the PHA would need is not cost or time effective. In addition, the PHA routinely underprices their owned properties to remain affordable. Units at PHA-controlled properties are majority LIHTC units not subject to rent reasonableness determinations and the the few units which are not LIHTC rents are still below FMR and true market.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This is the first year for this being implemented.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brighton MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Following will explain quality assurance method:

The PHA will employ a third-party to review a sample (25%) of the required annual rent reasonableness determinations. If the review reveals a non-reasonable rate greater than 5% of the sample, the PHA shall have the third-party review 100% of the rent determinations to ensure rent reasonableness is true and accurate. **and attached for quality assurance method**

Following will explain rent reasonableness determination method:

The PHA uses software from a nationally known and recognized third-party provider (Nelrod). The provider uses available market data to generate a set of comparable units for each rent reasonableness determination. The guidelines established with the software provider conform the the HUD requirements outlined in 24 CFR 982.305 and 24 CFR 982.507. **and attached for rent reasonableness determination method**

3.b. - Alternative Reexamination Schedule for Households (HCV)

In an effort to reduce administrative burden on the families and PHA staff, elderly and disabled households would move to a recertification schedule of every three years. Changes in these household's income is usually limited to annual Social Security COLA increase which are typically not cost or time effective to capture on an annual basis.

Notwithstanding the expanded ability to file more than one interim per year under the current PHA Administrative Plan, the agency shall not restrict MTW safe harbor and will allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Decreased revenue

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

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.

As this is the first year of implementation, there is no previous activity to compare against.

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brighton MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

Recertification Schedule is

Once every three years

Household may request 2 or more interim recertifications per year.

The PHA will conduct an interim reexamination of the household at the family's request, if the household adds or removes any household members, or if any non-elderly/non-disabled adult household member begins or ceases employment or other earned income.

In addition, the agency will allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.

3.d. - Self-Certification of Assets (HCV)

Families may self-certify assets under \$25,000 on an on-going basis. More than 95% of the families served on the program have less than \$5,000 in assets and it is extremely rare to have a household with greater than \$25,000 in assets. The families and PHA staff spend considerable time and effort in certifying those assets which would only in exceptionally rare cases generate more than \$100/year in income. PHA staff time and resources would be better served on other functions than verifying inconsequential assets.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently 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 this is the first year of implementation, there is no previous activity to compare against.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brighton MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The dollar threshold for the self-certification of assets is

\$25,000.

5.c. - Third-Party Requirement (HCV)

The PHA would be authorized to conduct its own HQS inspection for units, owned, controlled, or managed by the PHA. The agency is a smaller jurisdiction and securing a qualified, reliable third-party inspection can prove to be costly or time consuming to execute. Without a reliable third-party inspection, families face delays in occupancy.

The participant will be able to request an interim inspection.

HQS inspection standards will not be altered as found at 24 CFR 982.401.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Housing choice

This MTW activity has the following cost implications:

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently 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 this is the first year of implementation, there is no previous activity to compare against.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brighton MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The quality assurance method:

Following will explain the quality assurance method – The PHA would utilize a third-party inspector to perform the required SEMAP HQS QC inspections. Failed HQS QC inspections of greater than 10% would result in all PHA-owned, managed, or controller units being re-inspected. The family would also be able to request third-party inspection in the case of complaint or interim inspections.

If [Upload file] options- Display 'Attached for quality assurance method'

9.a. - Increase PBV Program Cap (HCV)

Since the local housing market is so tight, the PHA seeks to expand its options in supplying affordable units. PBV also serve as an option to help finance new affordable housing projects and to financially stabilize struggling affordable housing projects. Although there is no intent to project-base up to the full 50% (of the lower of either the total authorized units or annual budget authority) at this time, the PHA seeks to have this tool available address housing development or acquisition opportunities as they arise.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently 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 this is the first year of implementation, there is no previous activity to compare against.

No hardship were requested in the most recent fiscal year.**In the prior year, under this activity, Brighton MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

50.00% of total authorized HCV units will be authorized for project-basing.

9.b. - Increase PBV Project Cap (HCV)

The PHA is in control of several smaller sites which are difficult to develop but offer possibilities of providing affordable housing. Increasing the PBV project cap provides another tool to developing affordable housing options. Although it is not anticipated that this waiver would be immediately used upon implementation, it would provide new options in making difficult projects feasible.

The agency will remain subject to Notice PIH 2013-27 where applicable, or successor.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently 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 this is the first year of implementation, there is no previous activity to compare against.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brighton MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

Historically, the PHA has had extremely limited response responses to the PBV Selection Process. (Only one applicant). Having few or no options stifles the PHA's options to actively seek out qualified, proven partners to develop PBV projects. Having a reliable, knowledgeable developer increases the likelihood of projects coming to fruition and returns a bit of leverage back to the PHA over a selection process with only one applicant.

A subsidy layering review must be conducted.

The agency must complete site selection requirements.

HQS inspection must be performed by an independent entity according to 24 CFR 983.59(b) or 24 CFR 983.103(f).

The agency is subject to Notice PIH 2013-27 where applicable, or successor.

Property must be owned by a single-asset entity of the agency, see Notice PIH 2017-21.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently 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 this is the first year of implementation, there is no previous activity to compare against.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brighton MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

9.h. - Limit Portability for PBV Units (HCV)

The PHA wants to encourage the establishment of strong community ties to the jurisdiction. Vested interest in the community helps to create longer-term stability through the engagement of schools, employment, religious, community, or civic participation. Limiting portability by delaying choice mobility until two years have elapsed helps strengthen those ties between the participant and the community. It also reduces the impact portability has on a smaller PHA without denying portability.

The agency has a clear and uniform policy in place to address how move requests are received and how they are approved/denied for PBV households.

Participants will still retain the ability to request a tenant-based voucher for reasonable accommodation according to exiting rules.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Housing choice

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions (i.e., applicants) only

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

The MTW activity applies to all properties with project-based vouchers

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

As this is the first year of implementation, there is no previous activity to compare against.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brighton MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

17.b. - Service Provision

The PHA would allocate up to \$145,000 of HAP funding to support the following or similar programs:

Housing Navigation:

Housing Navigation Services further addresses long-term stabilization efforts for families. This program is focused on supporting families and individuals with housing needs, but expands services to include homeownership navigation. These services include navigation of homeownership opportunities, as well as assistance with finding and securing rental units. These services best address the housing continuum to move our community towards long-term housing stabilization.

Career and College Launch (CCL):

In partnership with 27J, Prairie View High School, and Custom Build Futures, BHA administers a program for high school and middle school students to investigate financial aid, explore post secondary school and program options, and even participate in an internship program. BHA delivers this program in multiple ways with on-the-job training, in person one-on-one sessions, group sessions, all with virtual options. This program is expanding quickly as more students consider next steps.

Domestic Violence Emergency Shelter:

BHA works closely with local law enforcement victim's advocates to temporarily house victims of domestic violence. We provide short-term stays with contracted hotels and can give basic necessities to these individuals. We also assist the victim's advocates in finding local referral agencies to help with their victims and perform a warm handoff. Many of these victims need wrap-around services that go beyond what the victims advocates do. This program is rapidly growing as needs and resources change quickly. We work diligently to keep up with local and state resources for victims who need wrap-around services and housing resources as these are limited. Housing navigation has become increasingly growing throughout the last 2 years.

Food Assistance:

BHA delivers food to older adults in need at our senior independent living properties. We partner with Food Bank of the Rockies to deliver commodities boxes to the doorsteps of approximately 25 families every month. In addition, we partner with a local food bank to deliver 30 boxes of food to families in need once per month.

Technology Library program:

BHA's existing Technology Library Program serves households who lack access to technology across Adams County. We currently offer short and long-term checkouts ranging from 24 hrs to 6 weeks. These timeframes allow families to attend one-time appointments or manage ongoing services needs. We check in with families regularly who are utilizing long-term check outs. These check-ins are survey-based. After three (3) check-ins, if the family has demonstrated that having the devices has allowed them to overcome barriers, we give them the device.

Tenant Based Rental Assistance (TBRA) Case Management:

We deliver case management services to our TBRA families. This is on top of the rent and security deposit assistance that we administer. Our services include resource navigation, housing navigation assistance, housing stability plans, referrals, etc. Relationship building with families is key to moving forward and off of assistance. We spend a great deal of time getting to know our families and meeting them where they are. We also provide resources to families who need assistance and referrals to other community agencies. Many community members want to know more about affordable housing, older adult housing referrals, homeless services, food assistance and school advocacy.

Vaccine Clinics:

We work closely with CDPHE and other community non-profits to host COVID-19 vaccine clinics on a regular basis at one of our local properties. We staff an open office space on a BHA property to provide easy access to vaccines for community members. We have worked with several community based non-profits, to engage hard-to-reach communities.

Youth tutoring:

The Youth Tutoring Program (YTP) is an educational enrichment program for K-12th-grade students who are low income.

This program was started to provide safe, positive, and stimulating environments to explore learning and experience academic and personal success. This includes enrichment opportunities like dance, music, sports, and art. Providing enrichment opportunities to families will encourage students to be creative, problem solve, and challenge themselves in new ways. In addition, tutoring programs can help students build better communication skills and relationships with peers and teachers both inside and outside of the classroom. We have seen an increase in the number of children participating in our program over the past year and grow in their abilities while in our program.

These initiatives build upon the agency's normal offering of rental assistance to provide more robust services to a wider population.

This MTW activity serves the following statutory objectives:

Self-sufficiency; Housing choice

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

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Denied hardship requests

There is\are hardship requests pending.

The following are the types of Services MTW Agency is providing:

Housing search and navigation. Higher education prep for high school students. Domestic violence supportive services. Food assistance. Technology and internet access services. Case management for families assisted under a county-funded tenant-based rental assistance program. COVID-19 vaccine clinics. Youth tutoring programs.

The agency will not spend more than 10% of its HAP budget on local, non-traditional activities.

Families receiving housing or services through local, non-traditional activities must meet the HUD definition of low-income.

The agency is subject to Notice PIH 2011-45 or any successor notice and/or guidance.

The agency will comply with section 30 of the 1937 Housing Act.

Any MTW funding awarded to a third-party provider must be competitively bid.

PHA provides services to 54 households in the most recently completed PHA Fiscal Year through this activity.

The MTW activity applies to all units/properties

1,400 # of persons receiving LNT services only in the most recently completed PHA fiscal year.

1,400 # of persons receiving LNT services only in the most recently completed PHA fiscal year.

D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: No Safe Harbor Waivers are being requested.

E.	Agency-Specific Waiver(s).
E.1	Agency-Specific Waiver(s) for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested. No Agency-Specific Waivers are being requested.
E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: MTW Agency does not have approved Agency-Specific Waivers

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
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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.
MTW agency established a rent reform policy to encourage employment and self-sufficiency	

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.
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	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
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.

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 (01/01/2022), 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 identity, 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.

Housing Authority of the City of Brighton

CO019

MTW PHA NAME

MTW PHA NUMBER/HA CODE

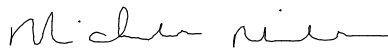
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729,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

Michelle Miller

PHA Board Chair

NAME OF AUTHORIZED OFFICIAL

TITLE



7/22/2022

SIGNATURE

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.*



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IMPACT ANALYSIS

As a requirement the Moving to Work (“MTW”) program, and specifically of item 3.b Alternative Reexamination Schedule for Households, the PHA is required to conduct an impact analysis. The impact analysis examined the proposal of changing the reexamination schedule for senior and disabled families to once every three (3) years. The analysis selected 61 currently participating senior or disabled families who had no less than two (2) annual reexaminations from which to collect data from. The indicator selected for study was the family Total Tenant Payment (“TTP”) and the percentage increase or decrease across a starting year of 2019 and then studying a three (3) year period. The general results of the study are as follows:

- A total of 214 years’ worth of annual reexaminations were reviewed
- The study groups average TTP increased, starting at \$334 in 2019 and ending at \$361 in 2022
- Between 2019 and 2022, TTPs increased an average of 8.03% (over the entire period, not per year)

- Under standard HCV rules the average family in this impact analysis would see the following results:
 - 2019 – TTP of \$334, annual reexamination required by PHA
 - 2020 – TTP of \$343, annual reexamination required by PHA
 - 2021 – TTP of \$352, annual reexamination required by PHA
 - 2022 – TTP of \$361, annual reexamination required by PHA

- Under the MTW proposal, the average family in this impact study would see these results:
 - 2019 – TTP of \$334, annual reexamination required by PHA
 - 2020 – TTP of \$334
 - 2021 – TTP of \$334
 - 2022 – TTP of \$361, annual reexamination required by PHA

- Based on average annual increase in the families TTP of \$9, the PHA would expect to be unable to offset HAP costs by \$4,320 per year
 - \$9 per family
 - Roughly 40 families (the number of families is reduced from the 61 study families since 1/3 of them will have an annual reexamination in any year)
 - 12 months

- The increased HAP costs represent less than 0.17% of the PHA’s annual budget authority but would represent significant savings in staff time and resources processing 61 reexaminations triennially

Impact Analysis Conclusions

1. Impact on agency finances.
 - a. Even with increasing the number of senior families to the maximum number of non-RAD vouchers allocated to the PHA (240), increased HAP expenditures would still be less than 1%; the change in the family's contribution would simply be deferred but there would be savings to the family during the 3-year period.
2. Impact on affordability of housing costs for affected families.
 - a. Calculating the family share remains unaffected and increased housing costs that would occur regardless of the MTW waiver are simply deferred until the triennial reexamination.
3. Impact on the agency's waitlists.
 - a. The tenant-based voucher program waitlist would be unaffected.
 - b. The project-based voucher programs waitlists would be unaffected.
4. Impact on the agency's termination rate of families.
 - a. This waiver is not expected to impact the termination rate of families.
5. Impact on agency's current utilization rate in the HCV program.
 - a. When comparing the increased HAP cost due to unrealized capture of disabled and elderly families' increased TTP's and the cost of supporting a single voucher at the current PUC, the increased HAP costs would neither support a single new voucher, nor require the termination of an existing voucher.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.
 - a. Freeing elderly and disabled families from annual reexaminations that have very little impact and reducing the burden on PHA staff and resources required to conduct and process those reexaminations yearly, represents a significant step towards better cost effectiveness.
7. Impact on the agency's ability to meet the MTW statutory requirements.
 - a. The cost effectiveness savings from this waiver free up staff time and resources to further pursue additional MTW statutory requirements more efficiently and effectively.
8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity.
 - a. Only 8.41% of the families in the impact analysis would have met the threshold for the hardship policy; however, the hardship threshold is largely irrelevant as the PHA is not proposing significant restrictions on the family voluntarily requesting or filing an interim reexamination.
9. Impact on protected classes.
 - a. The proposed waiver reducing the frequency of annual reexaminations provides a benefit to a protected class (disability) and is not expected to have any disparate impact.

Hardship Policy for Alternative Reexamination Schedule for Households (MTW 3.b)

A disabled or elderly family impacted by this waiver may still request a family-initiated interim reexamination of family income at any time between annual (or triennial) reexaminations in accordance with the existing PHA Administrative Plan. The PHA Administrative Plan does not place a limit on the number of family-initiated interim reexaminations that may be requested per year.

In addition, the agency will allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.



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HARDSHIP POLICY FOR ALTERNATIVE REEXAMINATION SCHEDULE FOR HOUSEHOLDS

(MTW 3.b)

A disabled or elderly family impacted by this waiver may still request a family-initiated interim reexamination of family income at any time between annual (or triennial) reexaminations in accordance with the existing PHA Administrative Plan. The PHA Administrative Plan does not place a limit on the number of family-initiated interim reexaminations that may be requested per year.

In addition, the agency will allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.



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July 14, 2021

**BRIGHTON HOUSING AUTHORITY
MOVING TO WORK PLAN
PUBLIC HEARING #1 MINUTES**

Virtual Public Hearing held at 4:00 PM:

- The Moving to Work (MTW) Plan was posted on the PHA website and was available for review by the public since June 30, 2021.
- Notice of this public hearing was posted on the PHA website and published in the local paper of record; the newspaper notice ran on June 30, 2021, July 7, 2021, and July 14, 2021.
- No phone calls or any other type of correspondence regarding the public hearing or MTW plan was received.
- No resident/participants attended the public hearing.
- No other comments were received.

Staff in attendance:

- Andrew W. Dall, Chief Housing Programs Manager
- Elsa Gonzalez, Housing Specialist
- Anneli Berube, Internal Project Administrator



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June 1, 2022

BRIGHTON HOUSING AUTHORITY MOVING TO WORK WAIVERS PUBLIC HEARING MINUTES

Virtual Public Hearing held at 3:32 PM:

- The proposed Moving to Work (MTW) waivers were posted on the PHA website and were available for review by the public since April 29, 2022.
- Notice of this public hearing was posted on the PHA website and published in the local paper of record; the newspaper notice ran on April 28, 2022, May 5, 2022, May 12, 2022, May 19, 2022, May 26, 2022, and June 2, 2022.
- No phone calls or any other type of correspondence regarding the public hearing or MTW plan was received.
- No resident/participants attended the public hearing.
- No other comments were received.

Staff in attendance:

- Andrew W. Dall, Deputy Director



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June 1, 2022

BRIGHTON HOUSING AUTHORITY MOVING TO WORK WAIVERS PUBLIC HEARING MINUTES

Virtual Public Hearing held at 3:32 PM:

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- No phone calls or any other type of correspondence regarding the public hearing or MTW plan was received.
- No resident/participants attended the public hearing.
- No other comments were received.

Staff in attendance:

- Andrew W. Dall, Deputy Director



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BRIGHTON HOUSING AUTHORITY ANALYSIS OF PUBLIC COMMENTS

As no member of the public attended any of the four public hearings or two board meetings where the Moving to Work Plan was presented and reviewed, there was little information to be incorporated into the plan.

The individual minutes of the hearings did describe some informal interactions with members of the public and those comments were incorporated into the plan. The most supported option was the reduced reexamination schedule.

For a comment inquiring about sole proprietorships and MTW benefits for them, the PHA was unable to develop a program or waiver for those cases at this time.

Overall public enthusiasm for the MTW was positive.