

PHA Name : Charleston-Kanawha

PHA Code : WV001

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 4/1/2023

PHA Program Type: Combined

MTW Cohort Number: Stepped and Tiered Rent

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Charleston-Kanawha Housing Authority (CKHA) has a vision for the Moving to Work (MTW) Program aligns with our existing vision, to be the leader in providing and supporting quality affordable housing desired by individuals and families in our market area. We intend to be initiative-taking and innovative in our strategies and activities to increase cost effectiveness within the organization and increase self-sufficiency and housing choices of our residents. Accordingly, our mission not only involves housing people, but also linking them to programs that will assist them on their journey to self-sufficiency. Service coordination and/or peer support services are available to all residents, including those that live in Public Housing and participants in the Housing Choice Voucher (HCV) program.

Participating in the rent reform cohort of the MTW Demonstration Program will allow CKHA to develop local solutions to address housing and self-sufficiency barriers within our communities. We will do this, in part, by simplifying our administrative burden, creating a stronger financial incentive for families to increase their income, continuing to provide a safety net for families that cannot readily increase their income, and minimizing increases in CKHA's average housing subsidy expenditures per family. We view this as an opportunity to invest in our community.

In order to achieve success, CKHA will align short and long-term goals with the three MTW statutory objectives:

1. Reduce cost and achieve greater cost effectiveness in federal expenditures;
 - a. Reduce the frequency of household certifications from one year to three years for those assigned to the tiered rent category, allowing them to save or use increased income over this time, rather than having to pay higher rent. Additionally, this reduces the burden on participants, HCV and Public Housing (PH) staff in acquiring, submitting and processing paperwork.
 - b. Implement waiver for Third-Party Requirement that would allow CKHA to inspect units on a more efficient schedule and to save time scheduling and cost of employing outside inspections.
 - c. Simplify rent calculations using the tiered rent structure and retrospective income and eliminating deductions.
 - d. Simplifying the utility allowance schedule for HCV participants that will make calculations more understandable.
 - e. Require documentation of assets over \$50,000 only, reducing time and effort required for staff and the majority of participants, as most fall in this category.
 - f. Modification to the Income Verification Hierarchy (Notice PIH 2018-18) to streamline the process for recertifications to EIV < Self-Certification.
2. Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming self-sufficient; and
 - a. Service coordination and other staff available to assess and address participant needs, including community referrals.
 - b. Coordination of on-site programming with community providers and resources for ease of access for tenants, including, but not limited to:
 - i. After school programs
 - ii. Medical care mobile units
 - iii. VITA tax preparation
 - iv. Financial literacy – with budgeting and credit reports
 - c. Essentials Pantries onsite providing items related to household needs and personal hygiene for tenants experiencing financial difficulties
 - d. On-site food pantries and delivery of food box delivery
 - e. Ability to address multiple needs/services at the same time – decreasing frustration, cost and confusion of trying to reach out to multiple agencies individually, including:
 - i. Provider fairs with multiple community organizations
 - ii. Enrollment fairs related to community college, Pre-K, high school equivalency classes/testing and child-care assistance subsidies
 - f. Partnership with American Job Center/One-Stop services that houses multiple service providers in one building for ease of access
3. Increase housing choices for low-income families
 - a. Increase Project-Based Voucher (PBV) Project Cap up to 100%, which will increase the number of units available and provide for more flexible use of housing units and provide for more flexible use of housing units and increased choice for tenants.
 - b. Specific staff position focused on providing additional help with searching for appropriate housing, including one-on-one support. This change would allow funding flexibilities so that the current person in this role could spend time more directly helping tenants, thereby, resulting in more efficient matching to vacant units, fill units more quickly and improve long-term relationships with property owners.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Currently Implementing
b. Tiered Rent (HCV)	Currently Implementing
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)	Currently Implementing
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)	Currently Implementing
s. Elimination of Deduction(s) (HCV)	Currently Implementing
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	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)	Currently Implementing
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
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)	Currently Implementing
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)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

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

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

1.a. - Tiered Rent (PH)

This waiver continues from the previously approved FY22 MTW Supplement submission.

This activity will apply to non-elderly and non-disabled families.

CKHA believes the Tenant Rent #1 - Tiered Rent (Income-Based) would be the best fit for our agency. Two reasons for our decision are: (1) our geographic area and (2) current economic state. We are confident that this rent structure along with community partnerships could potentially increase our families' self-sufficiency. CKHA has already eliminated interims in the HCV program for families that experience an increase in income until their next annual reexamination. As an agency, we felt that this policy change would allow the families an opportunity to gain greater momentum toward self-sufficiency. It would also reduce administrative burden in the calculation of rent and simplify the program both for staff and residents.

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.

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

This MTW activity applies to the following Public Housing developments:

WV001000003 Orchard Manor

WV001000007 Hillcrest - Oakhurst

WV001000008 South Park Village

WV001000027 CRH LP 1

WV001000028 CRH LP 2

WV001000029 Harris (Rand)/Anderson (Dunbar)

WV001000031 CRH LP 3

WV001000032 CRH LP 6

WV001000033 CRH LP 5

WV001000036 Starling Drive

WV001000037 729 Central Avenue

WV001000038 731 Central Avenue

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

N/A MTW Demonstration date has been postponed to February 2023.

This MTW activity requires a Safe Harbor Waiver.

The waiver was previously approved.

N/A MTW Demonstration date has been postponed to February 2023.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston-Kanawha MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The Tiered Rent chard consists of 31 tiers, with the income increasing by \$2,499 per tier. The tiered rent payments are set at 28% of gross annual income in the midpoint of the income tier.

Please see attached tiered rent policy table that shows the income bands.

The rent will be based on tiers of household income. Please see attached for the table on the tiered rent policy table that shows the income bands.

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

This activity uses different definition of income because we are using the following MTW waivers:

1.r. and/or 1.s. "elimination of deductions"

1.b. - Tiered Rent (HCV)

This waiver is continued and previously approved from FY22 MTW Supplement submission.

CKHA believes the Tenant Rent #1 - Tiered Rent (Income-Based) would be the best fit for our agency. Two reasons for our decision are: (1) our geographic area and (2) current economic state. We are confident that this rent structure along with community partnerships could potentially increase our family's self-sufficiency. CKHA has already eliminated interims in the HCV program for family's that experience an increase in income until their next annual

reexamination. As an agency, we felt that this policy change would allow the families an opportunity to gain greater momentum toward self-sufficiency. It would also reduce administrative burden in the calculation of rent and simplify the program both for staff and residents.

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.

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

This MTW activity applies to the following housing choice voucher unit types: The activity will apply to non-elderly, non-disabled under both the tenant-based and project-based voucher programs. All special programs, including VASH, EHV, Shelter Plus Care and Mainstream vouchers will be excluded.

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

N/A MTW Demonstration date has been postponed to February 2023.

This MTW activity requires a Safe Harbor Waiver.

The waiver was previously approved.

N/A MTW Demonstration date has been postponed to February 2023.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston-Kanawha MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The Tiered Rent chart consists of 31 tiers, with the income increasing by \$2,499 per tier. The tiered rent payments are set at 28% of gross annual income in the midpoint of the income tier.

Please see attached tiered rent policy table that shows the income bands.

The rent will be based on tiers of household income. Please see attached for the table on the tiered rent policy table that shows the income bands.

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

This activity uses different definition of income because we are using the following MTW waivers:

1.j. - Alternative Utility Allowance (HCV)

CKHA will utilize a simplified utility allowance schedule for all unit types, which will allow for an easier calculation method for staff and help families to better understand their rental payments. It will be based on the most common structure type, number of bedrooms and a base payment on the most common utilities.

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.

N/A MTW Demonstration date has been postponed to February 2023.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston-Kanawha MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

CKHA plans to implement a simplified utility allowance, a single utility schedule for all units and localities. The current utility schedule consists of nine localities and five unit classifications and the new utility schedule will use the most common housing structure and a base payment. The base payment will contain the most common utilities and less common utilities can be add-ons. The objectives are: 1.) less administrative burden on data entry and maintain the vast amounts of data, 2.) less affordability errors when selecting program participants or landlord responsibilities, unit type and locality, and 3.) improved communication to program participants and landlords on what a family can afford.

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

CKHA will eliminate all deductions and use gross income to calculate tenant rent, which will allow for an easier and more timely calculation method for staff and help families to better understand their rental payments. When there are extenuating circumstances that cause significant difficulty to pay the tiered rent, a hardship may be requested.

This activity will apply to non-elderly and non-disabled families.

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 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

This MTW activity applies to the following Public Housing developments:

WV001000003 Orchard Manor

WV001000007 Hillcrest - Oakhurst

WV001000008 South Park Village

WV001000027 CRH LP 1

WV001000028 CRH LP 2

WV001000029 Harris (Rand)/Anderson (Dunbar)

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WV001000032 CRH LP 6

WV001000033 CRH LP 5

WV001000036 Starling Drive

WV001000037 729 Central Avenue

WV001000038 731 Central Avenue

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

N/A MTW Demonstration date has been postponed to February 2023.

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

Attached Hardship policy applies to:

1.r. - Elimination of Deduction(s) (PH);1.s. - Elimination of Deduction(s) (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)}

The hardship policy has been modified based on following considerations:

specific guidance from HUD from the original 2022 submission

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston-Kanawha 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.

The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:

1.r. - Elimination of Deduction(s) (PH);1.s. - Elimination of Deduction(s) (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)

Following deduction(s) will be eliminated, modified, or added.

Dependent allowance;Unreimbursed childcare costs

1.s. - Elimination of Deduction(s) (HCV)

CKHA will eliminate all deductions and use gross income to calculate tenant rent, which will allow for an easier and more timely calculation method for staff and help families to better understand their rental payments. If the family experiences extenuating circumstances that impact their ability to pay the tiered rent, they may request a hardship.

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 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

This MTW activity applies to the following housing choice voucher unit types: The activity will apply to non-elderly, non-disabled households under both the tenant-based and project-based voucher programs. All special programs - VASH, EHV, Shelter Plus Care, Mainstream vouchers will be excluded.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about

what has been accomplished or changed during the implementation.

N/A MTW Demonstration date has been postponed to February 2023.

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, Charleston-Kanawha 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.

Following deduction(s) will be eliminated, modified, or added.

Dependent allowance;Unreimbursed childcare costs

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

CKHA will use a process that includes obtaining reasonable rent determinations from The Nelrod Company and their national database. This will ensure fair and valid determinations and will increase cost effectiveness and decrease staff administrative burden.

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.

N/A MTW Demonstration date has been postponed to February 2023.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston-Kanawha MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Following will explain quality assurance method:

please see attachment (which covers both quality assurance method and rent reasonableness determination method) **and attached for quality assurance method**

Following will explain rent reasonableness determination method:

please see attachment (which covers both quality assurance method and rent reasonableness determination method) **and attached for rent reasonableness determination method**

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

This waiver is approved based on FY22 MTW Supplement submission.

This activity will apply to non-elderly and non-disabled families.

CKHA will establish an alternative (triennial) reexamination schedule (allowing for adjusting via hardship policy if gross income drops into a lower tier). This will be more efficient for both staff and tenants and will allow tenants to increase their overall self-sufficiency by not being required to report increased income and pay an increased rental payment until the next triennial reexamination. Additionally, it is anticipated that tenants will have increased housing choices due to increased accessible income. Decreased staff time on completing annual recertifications will also improve cost effectiveness and decrease administrative burden.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Self-sufficiency

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

This MTW activity applies to the following Public Housing developments:

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WV001000036 Starling Drive

WV001000037 729 Central Avenue

WV001000038 731 Central Avenue

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

N/A MTW Demonstration date has been postponed to February 2023.

This MTW activity requires a Safe Harbor Waiver.

The waiver was previously approved.

N/A MTW Demonstration date has been postponed to February 2023.

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, Charleston-Kanawha 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.

Rather than having one possible interim, there will be a hardship policy in effect so that the family may request a hardship for 6 months when a qualifying circumstance happens. There is no limit to the amount of hardships a family may request.

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

This waiver is continued and approved based on FY22 MTW Supplement submission.

CKHA will establish an alternative (triennial) reexamination schedule (allowing for adjusting via hardship policy if gross income drops into a lower tier). This will be more efficient for both staff and tenants and will allow tenants to increase their overall self-sufficiency by not being required to report increased income and pay an increased rental payment until the next triennial reexamination. Additionally it is anticipated that tenants will have increased housing choices due to increased accessible income. This process should decrease administrative burden and improve cost effectiveness.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Self-sufficiency;Housing choice

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

This MTW activity applies to the following housing choice voucher unit types: This MTW activity applies to non-elderly, non-disabled households under both the tenant based and project based voucher programs. All special programs, VASH, EHV, Shelter Plus Care, Mainstream vouchers will be excluded.

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

N/A MTW Demonstration date has been postponed to February 2023.

This MTW activity requires a Safe Harbor Waiver.

The waiver was previously approved.

N/A MTW Demonstration date has been postponed to February 2023.

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, Charleston-Kanawha 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 previous request for triennial reexaminations as part of the Tiered Rent Demonstration does not allow for any interim

recertifications, but households may request temporary hardships. The number of temporary hardship requests is not limited.

3.c. - Self-Certification of Assets (PH)

CKHA will allow for self-certification of assets up to \$50,000. This will ease administrative burden and burden put upon tenants to provide lengthy, and often difficult to obtain, verification documentation. This will allow tenants to increase their assets without additional stress or burden and may allow them to have greater housing choice, as they could have more assets available to put towards things like transportation.

This activity will apply to non-elderly and non-disabled families.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Self-sufficiency

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.

N/A MTW Demonstration date has been postponed to February 2023.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston-Kanawha 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

\$50,000.

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

CKHA will allow for self-certification of assets up to \$50,000. This will ease administrative burden and burden put upon tenants to provide lengthy, and often difficult to obtain, verification documentation. This will allow tenants to increase their assets without additional stress or burden and may allow them to have greater housing choice, as they could have more assets available to put towards things like transportation.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Self-sufficiency

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.

N/A MTW Demonstration date has been postponed to February 2023.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston-Kanawha 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

\$50,000.

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

CKHA will perform HQS Inspections on PBV units that it owns, manages and/or controls. To ensure objective analysis, the Director of Leased Housing will randomly select a sample of Quality Control (QC) inspections that have been completed within the last 30 days. The number of QC inspections will equal 5%.

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.

Since implementation, there has been a reduction in administrative burden due to not having to coordinate with a third party, increase housing choices for participants due to reduction of the amount of time for a unit to be ready for move in and an increase in cost savings due to not having to pay a third party.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston-Kanawha 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 – please see attached quality assurance method for Third-Party Requirement (HCV)

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

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

Increasing PBV project caps will allow CKHA to increase the number of units within a building without HUD approval. It will provide for more flexible use of housing units and increased choice for tenants. This change will increase the number of units available for extremely low income families needing a high level of rental assistance. It will also preserve existing affordable housing allowing for redevelopment of aging out housing developments.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Housing choice

This MTW activity has the following cost implications:

Increased 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 to all assisted households

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

N/A MTW Demonstration date has been postponed to February 2023.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston-Kanawha MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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	<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, Agency-Specific Waivers may be requested.</p> <p>Please see attached for Agency-Specific Waiver(s) requested this year.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>The MTW agency should describe any changes in how the waiver is being implemented now compared to when it was originally approved.</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
2021	\$4,652,043	\$3,457,730	\$1,194,313	2029-09-30
2022	\$5,038,721	\$5,038,721	\$0	2030-09-30
2023	\$5,457,573	\$1,819,191	\$3,638,382	2031-09-30
2024				2032-09-30
2025				2033-09-30

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	0

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.
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.

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

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available
The PHA participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce PHA Administrative burdens. An independent research team led by MDRC will work with HUD and the selected PHAs to assist in implementation and evaluate the effects of the alternative rent policies.	Keith Olejniczak MDRC Keith.Olejniczak@mdrc.org 510-844-2306	Beginning February 1, 2023 for the duration of the current MTW Demonstration Study.	N/A

This waiver was previously requested for FY22 and is currently awaiting HUD approval.

MTW Agency-Specific Waiver 1: Modification to the Income Verification Hierarchy (Notice PIH 2018-18) to streamline the process for recertifications to EIV < Self-Certification and removing the steps in between (HCV and PH).

Core Waiver Questions

Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.
CKHA is proposing to modify the Income Verification Hierarchy that is posted in Notice PIH 2018-18. Instead, CKHA will use EIV for recertifications and then have resident self-certify the retrospective income, for both HCV and Public Housing. This MTW activity will enable CKHA to streamline the collection of retrospective income information. This process will greatly decrease staff administrative burden and make the retrospective income verification process more efficient for both staff and participant.
Which of the MTW statutory objectives does this MTW activity serve?
Cost effectiveness
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.
Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activities applies to a subset 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?
Both new admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types?
The MTW activity applies only to selected family types.
Please select the family types subject to this MTW activity.
Non-elderly, non-disabled families
If Other Selected in Previous Question: Please describe this target population.
N/A

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
The activity will apply to non-elderly, non-disabled households (selected as MTW program participants) under both the tenant based and project-based voucher programs. All special programs, VASH, EHV, Shelter Plus Care, Mainstream vouchers will be excluded.
Does the MTW activity apply to all public housing developments?
This MTW activity applies to specific developments.
Which developments participate in the MTW activity?
(households selected as MTW program participants) WV001000003 Orchard Manor WV001000007 Hillcrest - Oakhurst WV001000008 South Park Village WV001000027 CRH LP 1 WV001000028 CRH LP 2 WV001000029 Harris (Rand)/Anderson (Dunbar) WV001000031 CRH LP 3 WV001000032 CRH LP6 WV001000033 CRH LP 5 WV001000036 Starling Drive WV001000037 729 Central Avenue WV001000038 731 Central Avenue
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
N/A – new activity
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does this MTW activity require a hardship policy?
No

Does the MTW activity require an impact analysis?
Yes
Provided Already
Does the impact analysis apply to more than this MTW activity?
Yes
Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)
1.r. Elimination of Deductions (PH) 1.s. Elimination of Deductions (HCV) 3.a. Alternative Reexamination Schedule for Households (PH) 3.b. Alternative Reexamination Schedule for Households (HCV) & Agency-Specific Waiver – Income Verification (this one)

**Charleston-Kanawha Housing Authority
MTW Tiered Rent Impact Analysis**

MTW Activities	<p>Tenant Rent Policies 1.r. Elimination of Deductions (PH) 1.s. Elimination of Deductions (HCV)</p> <p>Reexaminations 3.a. Alternative Reexamination Schedule for Households (PH) 3.b. Alternative Reexamination Schedule for Households (HCV)</p> <p>Agency-specific waiver</p> <ul style="list-style-type: none"> • Income Verification – Modification to the Income Verification Hierarchy (Notice PIH 2018-18) to streamline the process for recertifications to EIV < Self-Certification and removing the steps in between.
1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)	
<p>Tenant Rent Policies</p> <p>The estimated average change in TTP/rent paid by families under the tiered rent policy as compared with the current policy is -\$4 for HCV. Aggregating this average across the approximately 679 families (based on 50% of the 1358 eligible) estimated to be in the tiered rent group generates a modest increase in HAP costs to the agency of about \$33,000 annually, which is not expected to impact the agency finances significantly. There is an anticipated benefit to the agency due to increased voucher utilization.</p> <p>The estimated average change in rent paid by families under the tiered rent policy as compared to the current policy is -\$1 for PH. Aggregating this average across the approximately 160 families (based on 50% of the 320 eligible) estimated to be in the tiered rent group generates a modest decrease in agency revenue by about \$2,000 annually, which is not expected to impact the agency finances significantly.</p> <p>Reexaminations</p> <p>There is possible increase in agency expenses anticipated due to annual/inflationary rent increases and no corresponding tenant rent share increases. These costs are expected to be offset by staff and administrative cost savings.</p> <p>Agency-specific waiver</p> <p>No anticipated impact. There may be staff and administrative cost savings since they will not have to spend time contacting and obtaining forms from specific agencies.</p>	
2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)	
<p>Tenant Rent Policies</p> <p>As noted above, the estimated average change in TTP/rent paid by families in the HCV program is -\$4 and in PH is -\$1.</p> <p>For HCV, 25% of families are expected to see a rent decrease under the tiered rent policy. 49% are expected to see no change. 26% are expected to see a rent increase; however, less than 2% of households will see a rent increase of \$50 or more.</p>	

For PH, 42% of families are expected to see a rent decrease under the tiered rent policy. 29% are expected to see no change. 29% are expected to see a rent increase; however, only 1.5% of households will see a rent increase of \$50 or more.

Families who experience a rent increase under the tiered rent policy will have the ability to request a hardship exemption to mitigate the impact of the policy.

Reexaminations

It is anticipated that families will have increased housing choice and self-sufficiency. The triennial certification process will encourage families to obtain full or part-time employment as they will be able to retain increased income between certifications.

Agency-specific waiver

No anticipated impact.

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

Tenant Rent Policies

No anticipated impact.

Reexaminations

No anticipated impact. Potentially, families may achieve self-sufficiency more quickly and that would allow for reduced wait times for other applicants.

Agency-specific waiver

No anticipated impact.

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

Tenant Rent Policies

There is minimal or no anticipated impact due to the availability of the hardship policy for families that need it.

Reexaminations

No anticipated impact. Potentially, families may receive less violations for noncompliance with completing annual forms.

Agency-specific waiver

No anticipated impact.

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

Tenant Rent Policies

No anticipated impact

Reexaminations

No anticipated impact.

Agency-specific waiver

No anticipated impact.

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

Tenant Rent Policies

Anticipated to have a positive impact on the statutory goals of cost effectiveness, housing choice and self-sufficiency. Simplifications to rent and utility calculations make for a clearer understanding for tenants, staff, and landlords. The hardship policy should allow for protection to families if necessary. Eliminating deductions is expected to reduce staff time/admin costs. Families are expected to have greater housing choice and increased self-sufficiency due to clear understanding of rent and utility expectations.

Reexaminations

Anticipated to have a positive impact on CKHA's ability to meet the statutory goals of cost effectiveness, housing choice and self-sufficiency. Moving to triennial reexaminations and not requiring families to report income increases between triennial reexaminations is expected to provide an incentive for families to increase their earned income since they will be able to keep more of their earned income between reexaminations, providing the potential for the family to pay for rent without assistance or save for deposits or down payments.

Agency-specific waiver

It is anticipated that this will increase cost effectiveness due to decreasing staff time and administrative costs.

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

Tenant Rent Policies

The simplified rent and utility calculations and elimination of deductions is anticipated to increase CKHA's ability to increase cost-effectiveness overall. Additionally, the savings of staff time will allow them to focus on helping families find resources to address any barriers, increasing housing choice and self-sufficiency.

Reexaminations

It is anticipated that these activities will have a significant impact on families in assisting them in becoming more self-sufficient. The staff time and administrative costs through triennial certifications improves overall program/agency cost effectiveness.

Agency-specific waiver

It is anticipated that this will increase cost effectiveness due to decreasing staff time and administrative costs.

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

Tenant Rent Policies

Families who are selected to pay tiered rent are anticipated to potentially requesting a higher number of hardships than under the current rent policy, due to the loss of deductions and lack of interim

reviews. Families who have a significant number of dependents and/or lose other federal or state benefits due to moderate increases in income, are expected to be the most likely to receive hardship exemptions. However, the number of large families (5 or more dependents) eligible for the study is less than 2%.

Households who are part of the tiered rent group and who experience a loss of income between triennial reexaminations may request hardship exemptions, but this number is difficult to estimate. CKHA intends to track hardship requests to determine the impact of the policy on participant families and on staff time spent processing hardship requests.

Reexaminations

No anticipated impact.

Agency-specific waiver

No anticipated impact.

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

Tenant Rent Policies

No anticipated impact. Elderly/disabled households are excluded from the tiered rent demonstration study.

Reexaminations

No anticipated impact. It could potentially be a positive impact for families who work a schedule that makes it more difficult for them to come in during CKHA hours, as they will only have to recertify every three years.

Agency-specific waiver

No anticipated impact. It could potentially be a positive impact for families who have changed jobs frequently or have difficulty contacting previous employment.



Tiered Rent Chart (28% midpoint)

Tier	Tier Income Minimum	Tier Income Maximum	Tiered Rent 28%
1	\$0	\$2,499	\$50
2	\$2,500	\$4,999	\$87
3	\$5,000	\$7,499	\$146
4	\$7,500	\$9,999	\$204
5	\$10,000	\$12,499	\$262
6	\$12,500	\$14,999	\$321
7	\$15,000	\$17,499	\$379
8	\$17,500	\$19,999	\$437
9	\$20,000	\$22,499	\$496
10	\$22,500	\$24,999	\$554
11	\$25,000	\$27,499	\$612
12	\$27,500	\$29,999	\$671
13	\$30,000	\$32,499	\$729
14	\$32,500	\$34,999	\$787
15	\$35,000	\$37,499	\$846
16	\$37,500	\$39,999	\$904
17	\$40,000	\$42,499	\$962
18	\$42,500	\$44,999	\$1,021
19	\$45,000	\$47,499	\$1,079
20	\$47,500	\$49,999	\$1,137
21	\$50,000	\$52,499	\$1,196
22	\$52,500	\$54,999	\$1,254
23	\$55,000	\$57,499	\$1,312
24	\$57,500	\$59,999	\$1,371
25	\$60,000	\$62,499	\$1,429
26	\$62,500	\$64,999	\$1,487
27	\$65,000	\$67,499	\$1,546
28	\$67,500	\$69,999	\$1,604
29	\$70,000	\$72,499	\$1,662
30	\$72,500	\$74,999	\$1,721
31	\$75,000	\$77,499	\$1,779



RENT REASONABLENESS QUALITY & IMPARTIALITY POLICY

A. Purpose

1. Introduction and purpose of the policy

This document establishes the policy related to quality and impartiality management concerning Rent Reasonableness.

2. Scope

This procedure is applicable to all personnel involved in the Projected-Based Rent Reasonableness process. It provides a quality statement, quality objectives and the means by which quality and impartiality is developed and maintained within CKHA.

3. Distribution

This document is distributed to all staff involved in the process upon training and will be maintained in the Leased Housing Department Procedures folder, located on the P drive. Staff are informed of changes as soon as they have been finalized. Interested parties may obtain a copy on request.

4. Authority and revision

This policy is approved by the CKHA Board of Commissioners. It is the responsibility of the Chief Executive Officer (CEO) to review the appropriateness of the policy from time to time. It may be revised when the need arises. Its effectiveness in meeting the quality of CKHA will be assessed during Internal Review.

B. Procedure

1. Activity

CKHA is authorized to perform rent reasonable determinations for CKHA-owned Project Based Units.

2. Safe Harbors

- i. **Quality assurance method to ensure impartiality** – CKHA currently utilizes a third party to verify rent reasonableness for units. The third party agency has a Statement of Compliance with Reasonable Rent Regulations, see below.

The system was designed to correct long-standing misconceptions and problems about reasonable rent analysis. For example, other systems allow the Agency Analyst to select the comparable units, allowing for possible favoritism, subjectivity, and Fair Housing Issues. The third party agency automatically selects the best comparable units in the database using consistent and objective methods.

In another example, some systems look for comparable units based only on the same or similar rents. They do not account for differences in the



RENT REASONABLENESS QUALITY & IMPARTIALITY POLICY

characteristics between the assisted and comparable units. The system uses the standard deviation method to enable proper comparisons of the unit to be assisted and comparable units with different characteristics, assuring the Agency that an “apples-to-apples” comparison is made.

Agency should always ensure the database has an adequate number of current comparable units in all communities in which the Participants live as well as communities that may provide Expanded Housing Opportunities. Expanded Housing Opportunities is a HUD term that indicates a geographic area that may offer better housing quality, good public transportation, good schools, close proximity to jobs and services, etc.

This Policy represents a reasonable method per the Section 8 Housing Choice Voucher and SEMAP regulations, as well as the HUD Housing Choice Voucher Program Guidebook. It also represents a common-sense approach according to the HUD SEMAP Confirmatory Review and Reasonable Rent Quality Assurance protocols.

- ii. **Method used to determine that rents charge by owners to voucher participants are reasonable when compared to similar unassisted units in the market area** - The regulations do not require a specific method to be utilized. The only requirements for comparability at 24 CFR 982.507 (b) is for the Agency to utilize unassisted units as comparable units and to consider all nine characteristics for each determination. Therefore, the reasonable rent system uses only unassisted units for comparable units. It also considers the following characteristics for each determination.

- Location
- Quality
- Size (by # of bedrooms, overall size and # of bathrooms)
- Unit type
- Age of the contract unit
- Amenities
- Housing services
- Maintenance
- Utilities to be provided by the owner

The only requirements for reasonable rent at 24 CFR 985.3 (b) is for the Agency to have and implement a reasonable written method that uses all nine of the above characteristics. This Policy describes the reasonable method herein.

The Rent Determination Report documents implementation of this Policy. This Policy includes an example of this Report.



RENT REASONABLENESS QUALITY & IMPARTIALITY POLICY

I. **Step-by Step Explanation of Procedures**

This section first explains the preparation needed to perform reasonable rent determinations; then it provides the steps to implement the reasonable rent determinations.

Preparation: Use of Location

The first step in preparation concerns the location characteristic. Location has the greatest impact on rent. Therefore, this system gives the greatest weight to location.

To define location, the third-party Analysts divide the Agency's jurisdiction into three rental market value areas. Each unit to be assisted and each comparable unit is assigned to be in either a high, medium, or low rental market value location. Section III of this Policy provides an explanation of how these rental market values are determined.

Preparation: Assigning Maximum Value Points to HUD Required Characteristics

The third-party agency assigns maximum value points to each HUD required characteristic. These value points represent the economic value for each characteristic.

Value Point Levels Applied to Each Characteristic

Each characteristic is assigned a value point level. Characteristics with higher levels have more impact on the actual rent. Level V has the highest number of potential value points. Level I have the lowest number of potential points.

Each level has a value point range. The actual number of value points assigned to a characteristic is determined by the description of each characteristic in a particular unit. For example, for the quality characteristic, a unit with high quality will receive more value points than a unit with fair quality. The table below provides value levels and point ranges.

Characteristic	Value Point Level	Value Point Range
Location	V	15-23
HQS Quality	IV	10-18
Utilities Provided by Owner	IV	0-18
Building Structure (Unit Type)	IV	10-18
Overall Unit Size	III	8-13
Number of Bedrooms	II	4-9
Number of Bathrooms	II	4-9



RENT REASONABLENESS QUALITY & IMPARTIALITY POLICY

Age	II	4-9
Amenities	II	0-9
Maintenance	I	1-5
Housing Services	I	0-5

3. Internal QC

Once the rent reasonableness has been determined by the Director of Leased Housing, the Chief Operations Officer (COO) will verify all processed have been followed and sign off if approved. The final step in this process will include a review from a staff person from Finance to perform a review on all documentation to ensure independence, impartiality, and integrity.



HQS THIRD-PARTY REQUIREMENT QUALITY & IMPARTIALITY POLICY

A. Purpose

1. Introduction and purpose of the policy

This document establishes the policy related to quality and impartiality management concerning the third-party requirement for HQS inspections on (Project-Based Voucher) PBV units that it owns, manages, and/or controls.

2. Scope

This procedure is applicable to all personnel involved in the CKHA PBV inspection process. It provides a quality statement, quality objectives and the means by which quality and impartiality is developed and maintained within CKHA.

3. Distribution

This document is distributed to all staff involved in the process upon training and will be maintained in the Leased Housing Department Procedures folder, located on the P drive. Staff are informed of changes as soon as they have been finalized. Interested parties may obtain a copy on request.

4. Authority and revision

This policy is approved by the CKHA Board of Commissioners. It is the responsibility of the Chief Executive Officer (CEO) to review the appropriateness of the policy from time to time. It may be revised when the need arises. Its effectiveness in meeting the quality of CKHA will be assessed during Internal Review.

B. Procedure

1. Activity

CKHA is authorized to perform HQS inspections on PBV units that CKHA owns, manages, and/or controls.

2. Safe Harbors

- i. **Quality assurance method to ensure objective analysis** – The Director of Leased Housing will randomly select a sample of Quality Control (QC) inspections that have been completed within the last 30 days. The number of QC inspections will equal 5%.
- ii. **Participant must be able to request an interim inspection** – CKHA's policy currently allows participants to request an interim inspection. This policy will not be changed. The participants currently contact a Customer Service Specialist and/or the Inspections Coordinator after there is no resolution with the Property Manager.
- iii. **HQS inspection standards must not be altered as found at 24 C.F.R. 982.401** – CKHA currently is a demonstration site for NSPIRE-V. CKHA meets



HQS THIRD-PARTY REQUIREMENT QUALITY & IMPARTIALITY POLICY

the requirements under 24 C.F.R. 982.401.a.4. All NSPIRE-V inspections are sent electronically to HUD once the inspection has been completed.

- iv. **At Department's request, CKHA must obtain services of a third-party entity to determine if CKHA-owned units pass HQS** – CKHA currently has a MOU with two other Housing Authorities if this is requested from HUD.

Charleston-Kanawha Housing Authority (CKHA)

MOVING TO WORK (MTW) HARDSHIP POLICY AFFECTING TIERED RENT

This Hardship Policy applies to the following MTW activities (for those households selected as MTW Tiered Rent program participants):

- 1) Tenant Rent Policies – Elimination of deductions while using gross income to calculate rent and
- 2) Reexaminations – Establishment of triennial reexamination schedule (allowing for hardship requests and/or automatic adjustment via hardship policy if current gross income level drops into lower tier than retrospective income)

Tiered Rent Hardship Policy - Overview

The Tiered Rent policy is intended to benefit assisted households by allowing them to increase their income without an immediate increase in their total tenant payment (TTP) for HCV families or Tenant Rent for Public Housing residents. Households will have an income examination every three years, and in between the triennial reexaminations their tiered rent will not increase. However, some households may need special accommodations to avoid negative consequences of placement in the tiered rent.

General Hardship Provisions

Hardships must be requested by the household in writing, with the exception of automatic hardships processed by CKHA during the first or subsequent triennial income examinations. Hardships should use CKHA's MTW Request for Hardship Exception form.

CKHA will temporarily approve the hardship beginning the first day of the next month after the receipt of a valid hardship request indicating qualifying circumstances. This hardship will be based on the tier corresponding to the household's current gross income, reported by the household in their hardship request. The household will be required to provide the required documentation within 14 business days, to enable CKHA to verify the hardship. CKHA will decide whether to deny or approve the hardship within 14 business days of receiving required documentation. If the hardship request is denied, the household may be required to enter into a repayment agreement.

If the hardship is approved, and the household subsequently experiences another adverse event while still in hardship status, they may request an additional hardship that might further reduce their TTP. There is no limit to the number of hardships that a household may receive.

If a household is approved, they are not required to report income increases during the period of their approved hardship and it will not end early. At least thirty days prior to the

expiration of the tiered rent hardship, the household will be notified of returning to their rent portion set at their last triennial recertification.

If the head of household, spouse, or co-head of household becomes elderly or disabled, the household is eligible to be excluded from the tiered rent and return to the traditional income-based rent policy.

This hardship policy presents eligibility criteria and remedies for different types of hardships. If a household's circumstances correspond to more than one type of hardship, they will receive the hardship most beneficial to them.

Hardship Types, Criteria, and Remedies

- I. **Hardship Due to Elimination of Deductions.** Some families may face a hardship due to the tiered rent policy's reliance on gross income (with no deductions) instead of adjusted income. The childcare deduction requires special attention because childcare can be very expensive and because paid childcare is often essential for enabling parents to work.

Automatic hardship at enrollment or triennial reexamination: CKHA conducts a full income reexamination (at enrollment to the tiered rent, and again three years later) for newly admitted households or for those currently receiving assistance; if the household has \$2,500 or more of eligible out-of-pocket childcare expenses annually, CKHA will deduct that sum from their current gross income and assign a hardship rent based on the tier that corresponds to their adjusted current income.

Hardship requested by household: Any household participating in the tiered rent study whose circumstances change such that they would have \$2,500 or more of out-of-pocket childcare expenses annually, may request a hardship by submitting a completed MTW Request for Hardship Exception form.

Eligibility: A household will be eligible for this hardship exemption if they have \$2,500 or more out-of-pocket childcare expenses annually.

When approved, a hardship agreement will be in effect for **six months only.** An additional written request will need to be completed for an additional hardship. Prior to the expiration of the tiered rent hardship, the household will be notified of their rent portion set at their last triennial recertification.

- II. **Hardship Due to Reduced Income.** Households participating in the tiered rent may be eligible for a hardship if their income decreases.

Automatic hardship: When CKHA conducts an income examination (at the time of enrollment, and at subsequent triennial income reexaminations), CKHA will compare the household's current income with their prior year/retrospective income. If the household's current gross income would place them in a lower

income tier than their prior year/retrospective gross income, CKHA will automatically determine whether the household is eligible for a hardship.

Hardship requested by household: At any time other than enrollment and triennial income reexaminations, a hardship must be requested by the household by submitting a completed MTW Request for Hardship Exception form.

Eligibility: A household will be eligible for this hardship exemption if current gross income corresponds to a lower income tier than the tier they were placed in at the last income recertification.

When approved, a hardship agreement will be in effect for **six months only**. An additional written request will need to be completed for an additional or continued hardship. Prior to the expiration of the tiered rent hardship, the household will be notified of their rent portion set at their last triennial recertification.

III. Other Circumstances. A household may request a hardship exemption for other circumstances not outlined above, such as the death of a family member, a significant increase in reasonable and necessary out-of-pocket expenses because of changed circumstances (for example, a large medical bill), or if the household is facing eviction due to inability to pay the rent. CKHA will consider these requests on a case-by-case basis and decisions will be made by CKHA's hardship review panel; the hardship review panel will consist of the MTW Coordinator, one Housing Specialist/PH Manager, and the HCV/PH Program Director.

Eligibility: The hardship review panel determines that circumstances beyond the household's control make it difficult for the household to pay the tiered rent TTP, and a temporary rent reduction is necessary.

CKHA will set the household's TTP to the \$50 minimum rent for **two months**. Prior to the expiration of the tiered rent hardship, the household will be notified of their rent portion set at their last triennial recertification.

Appeals

For procedures pertaining to grievance hearing requests based upon CKHA's denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

CKHA Agency Analysis of MTW Public Comments (2022)

CKHA staff reviewed all comments and questions from all public meetings related to the MTW Demonstration Program Study.

The most frequent comments were related to getting help finding a job and/or concern related to paying rent. It was determined that an updated flyer, including staff changes and contact information, distributed to CKHA residents would be helpful in informing and reminding them that there is a Family Self-Sufficiency Program and Service Coordinators within the CKHA Client Services Department to help obtain resources.

Some concerns regarding rent payment amounts increasing, particularly above flat rent, were expressed. It was determined that staff would reiterate that those assigned to Tiered Rent would have the option to pay flat rent. Additionally, a fact sheet about Hardships and submitting requests will be distributed, including the timeline of the approval process.

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 04/01/2023, 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.

Charleston - Kanawha Housing Authority

WV001

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).

Allan L. McVey

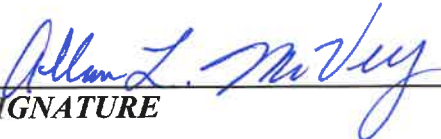
Chair of Board of Commissioners

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE



1-17-2023

* 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.