

PHA Name : Charleston-Kanawha

PHA Code : WV001

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

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's (CKHA) MTW application envisioned using MTW flexibility to strengthen provision and support of quality affordable housing desired by individuals and families in the local market area. CKHA intends to be initiative-taking and innovative in strategies and activities to increase cost effectiveness within the organization and increase self-sufficiency and housing choices of residents.

Participation in the MTW Program will allow CKHA to develop local solutions to address housing and self-sufficiency barriers in the community. CKHA intends to simplify administrative burden, create a stronger financial incentive for families to increase their income, continue to provide a safety net for families that cannot readily increase their income, and minimize increases in CKHA's average housing subsidy expenditure per family. In order to achieve success, CKHA will align short and long-term goals with the three MTW statutory objectives of reducing cost and achieving greater cost effectiveness in federal expenditures, giving 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 economically self-sufficient. Proposed changes to policy and program administration, including requests for waivers, that will facilitate MTW activities will be described in successive MTW Supplements to CKHA's Annual Plan. This process includes engaging residents, program participants, stakeholders, staff, community partners and residents.

CKHA's Annual Supplement for the fiscal year beginning April 1, 2023 included waivers focusing on participating in the MTW Demonstration Study related to Rent Reform via Tiered Rent. Additionally, to decrease burden on both staff and residents, increasing the limit for self-certification of assets for all residents and voucher participants, using an alternative utility allowance for voucher participants, and waiving the third party requirement for both HQS inspections on PBV units that CKHA owns, manages or controls, and determination of rent reasonableness.

This Supplement for the fiscal year beginning April 1, 2024 will add waivers allowing CKHA to increase housing choices by increasing PBV rent to owner to 120%, establishing and implementing payment standards based on 120% of Fair Market Rents (FMR). Additionally, a waiver will be added to allow elderly households to complete reexaminations triennially rather than annually, significantly decreasing staff and tenant burden. Another waiver is being requested to create an alternative structure for securing local resources to support a Family Self-Sufficiency Program with MTW flexibilities.

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)	Was Discontinued in a previous Submission Year
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)	Plan to Implement in the Submission Year
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)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	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)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Plan to Implement in the Submission Year
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)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.</p> <p>As part of the cohort-specific Rent Reform study, CKHA is implementing a tiered rent policy for certain households. Qualifying families will be randomly selected to either pay under the current (standard) or the new (tiered) rent policy. Under the tiered rent policy, families will pay rent based on a rent schedule within tiers of \$2,500. The rent paid by the family will be based on 28% of the midpoint of the income tier corresponding to the family income. Income will be calculated based on gross income for the prior 12-month period for existing households and the current income for newly-admitted households.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased revenue; Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Non-elderly, non-disabled families</p>
<p>Does the MTW activity apply to all public housing developments?</p> <p>The MTW activity applies to specific developments</p>
<p>Which developments participate in the MTW activity?</p> <p>WV001000003 Orchard Manor, WV001000007 Hillcrest/Oakhurst, WV001000008 South Park, 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</p>

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

CKHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policy and associated procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023. Enrollment will continue for a full year.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The safe harbor waivers requested for the study allow CKHA to implement the study as designed by HUD.

Please describe how the income bands are structured?

Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier (representing monthly income), except that households with incomes below \$2,500 will pay a minimum rent of \$50.

Please upload the tiered rent policy table that shows the income bands.

This document is attached.

What is the income basis for assigning households to income bands?

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)
1.r. and/or 1.s. "elimination of deductions"

1.b. - Tiered Rent (HCV)

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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

As part of the cohort-specific Rent Reform study, CKHA is implementing a tiered rent policy for certain households. Qualifying families will be randomly selected to either pay under the current (standard) or the new (tiered) rent policy. Under the tiered rent policy, families will pay rent based on a rent schedule within tiers of \$2,500. The rent paid by the family will be based on 28% of the midpoint of the income tier corresponding to the family income. Income will be calculated based on gross income for the prior 12-month period for existing households and the current income for newly-admitted households.

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

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; 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 activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity will apply to non-elderly, non-disabled under both the tenant-based and project-based voucher programs. All special purpose vouchers, 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.

CKHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policy and associated procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023. Enrollment will continue for a full year.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The safe harbor waivers requested for the study allow CKHA to implement the study as designed by HUD.

Please describe how the income bands are structured.

Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier (representing monthly income), except that households with incomes below \$2,500 will pay a minimum rent of \$50.

Please upload the tiered rent policy table that shows the income bands.

This document is attached.

What is the income basis for assigning households to income bands?

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

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

1.j. - Alternative Utility Allowance (HCV)

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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

CKHA utilizes a simplified utility allowance schedule for all unit types, which allows for an easier calculation method for staff and helps families better understand their rental payments. It is based on the most common structure type, number of bedrooms and a base payment on the most common utilities.

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

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

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 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.

The alternative utility allowance has been implemented and allows for a decreased burden on staff when calculating TTP and discussing with participants the expectations for the amount paid in rent and utilities.

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

No

Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.

CKHA is implementing a simplified utility allowance, a single utility schedule for all units and localities. The previous utility schedule consisted of nine localities and five unit classifications and the alternative utility schedule uses the most common housing structure and a base payment. The base payment contains the most common utilities and less common utilities can be add-ons. The objectives are less administrative burden on data entry and maintain the vast amounts of data, less affordability errors when selecting program participants or landlord responsibilities, unit type and locality, and improved communication to program participants and landlords on what a family can afford.

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

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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

As part of the tiered rent study, families who are selected to pay rent under the tiered rent policy have their rent calculated

using gross income from the prior 12 months (except new admissions have their rent calculated using current gross income). When there are extenuating circumstances that cause significant difficulty to pay the tiered rent, a hardship may be requested.

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.

Increased revenue; 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 activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?

WV001000003 Orchard Manor, WV001000007 Hillcrest/Oakhurst, WV001000008 South Park, 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.

CKHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policies procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes
Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple 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)
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Does the MTW activity require an impact analysis? Provided Already
Which deduction(s) will be eliminated, modified, or added? Dependent allowance; Unreimbursed childcare costs

1.s. - Elimination of Deduction(s) (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented. As part of the tiered rent study, families who are selected to pay rent under the tiered rent policy have their rent calculated using gross income from the prior 12 months (except new admissions have their rent calculated using current gross income). When there are extenuating circumstances that cause significant difficulty to pay the tiered rent, a hardship may be requested.
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. Increased revenue; 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 activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity. Non-elderly, non-disabled families

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity will apply to non-elderly, non-disabled under both the tenant-based and project-based voucher programs. All special purpose vouchers, 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.

CKHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policies procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

Which deduction(s) will be eliminated, modified, or added?

Dependent allowance; Unreimbursed childcare costs

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

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

CKHA will increase the payment standard to 120% of the Fair Market Rent. Due to the rental market increase, this payment standard increase will keep pace with that market increase and make it easier for voucher holders to find a place of their choice. This is not expected to increase the monthly amount that the tenant will pay as it is more likely that the particular unit would fall within the payment standard.

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

Self-sufficiency; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

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

The MTW activity applies to all assisted households

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

This waiver is not yet approved and has not been implemented.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

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

2.b. - Payment Standards- Fair Market Rents (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

Yes

What considerations led the MTW agency to modify the hardship policy?

The hardship policy relating to tiered rent has NOT been modified.

The attached hardship policy is related to the currently requested waivers relating to households that are ineligible for the Rent Reform Demonstration.

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

Please explain the payment standards by FMR:

CKHA will increase the payment standards to 120% of the FMR.

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

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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

CKHA uses a process that includes obtaining reasonable rent determinations from the The Nelrod Company and their national database. This ensures fair and valid determinations and increases cost effectiveness while decreasing staff administrative burden.

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

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

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 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.

CKHA received HUD approval for this waiver and has begun implementing it. This has significantly decreased expenditures for paying for third-party services.

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

No

Please explain or upload a description of the quality assurance method.

CKHA rent reasonable process includes using rent comparables generated by the third party company, The Nelrod Company, to identify comparable units. The rent reasonableness determinations will be performed by a CKHA staff person who is trained on HCV and PBV rent reasonableness regulations, usually the Director of Voucher Management, the Chief Operations Officer will verify that processes have been followed and then a staff person from the Finance department, who is trained on HCV and PBV rent reasonableness regulations, will review to ensure independence, impartiality and integrity.

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.

CKHA uses a third party company (The Nelrod Company) to generate rent comparables for the HCV and PBV programs. The reasonable rent system uses only unassisted units for comparables and considers, in each determination, location, quality, size, unit type, age, amenities, housing services, maintenance and utilities to be provided by the owner. Once the software generates comparables, a CKHA staff member who is knowledgeable about HCV and PVB rent reasonableness regulations reviews the comparables to confirm that they are comparable to the specific unit.

No document is attached.

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

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

CKHA is requesting approval for an additional waiver for triennial recertifications, separate from the Rent Reform Demonstration. This request for a second waiver would allow for triennial reexaminations for households where the head of household is 62 years of age or older. This would decrease administrative burden and burden to the older tenants.

See the FY22 MTW Supplement for a full description of this activity for families that have been assigned to pay tiered rent. This activity has been approved by HUD and is currently being implemented.

CKHA received approval to implement triennial reexaminations for families who are part of the Tiered Rent Demonstration and selected to pay under the tiered rent policy.

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

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; 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 activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families; Elderly families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?

WV001000003 Orchard Manor, WV001000007 Hillcrest/Oakhurst, WV001000008 South Park, 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

For the elderly households - the MTW activity applies to all developments and is based on the age of the residents in the individual unit.

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.

CKHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policies procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023.

The current waiver request (for elderly households) has not yet been approved and has not been implemented.

Does this MTW activity require a hardship policy?

Provided Already

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The safe harbor waiver is for Tiered Rent triennials and allows CKHA to implement the tiered rent policy as designed by HUD.

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

Yes

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

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

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

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

The hardship policy affecting households that are ineligible for the Rent Reform Demonstration provides up to two hardship requests annually for a decrease in income by 10% or more or another extenuating circumstance. For a hardship due to a decrease in income, elderly households will maintain the hardship amount of ttp/rent until their next triennial reexamination. For non-elderly households, the hardship will remain in place until the next annual reexamination. For extenuating circumstances, for either type of household, the rent will be set at the minimum rent of \$50 for two months and then will return to the same amount as before the hardship.

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

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

CKHA is requesting approval for an additional waiver for triennial recertifications, separate from the Rent Reform Demonstration. This request for a second waiver would allow for triennial reexaminations for households where the head of household is 62 years of age or older. This would decrease administrative burden and burden to the older tenants.

See the FY22 MTW Supplement for a full description of this activity for tiered rent households. This activity has been approved by HUD and is currently being implemented. CKHA received approval to implement triennial reexaminations for families who are part of the Tiered Rent Demonstration and selected to pay under the tiered rent policy.

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

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; 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 activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families; Elderly families

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 waiver request will apply to elderly households under both the tenant-based and project-based voucher programs.

This activity will apply to non-elderly, non-disabled under both the tenant-based and project-based voucher programs. All special purpose vouchers, 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.

CKHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policies procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023.

The current waiver request has not yet been approved and not been implemented.

Does this MTW activity require a hardship policy?

Provided Already

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The safe harbor waiver is for Tiered Rent triennials and allows CKHA to implement the tiered rent policy as designed by HUD.

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

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

The hardship policy affecting households that are ineligible for the Rent Reform Demonstration provides up to two hardship requests annually for a decrease in income by 10% or more or another extenuating circumstance. For a hardship due to a decrease in income, elderly households will maintain the hardship amount of ttp/rent until their next triennial reexamination. For non-elderly households, the hardship will remain in place until the next annual reexamination. For extenuating circumstances, for either type of household, the rent will be set at the minimum rent of \$50 for two months and then will return to the same amount as before the hardship.

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

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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

CKHA allows for self-certification of assets up to \$50,000, which eases administrative burden and burden put upon tenants to provide lengthy, often difficult to obtain, verification documentation.

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

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

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 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.

CKHA received HUD approval for this waiver and has begun implementing it. This waiver appears to reduce staff burden by saving a significant amount of time not following up with third parties for verification or waiting on tenants to provide the documentation.

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

No

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

\$50,000.

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

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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

CKHA allows for self-certification of assets up to \$50,000, which eases administrative burden and burden put upon tenants to provide lengthy, often difficult to obtain, verification documentation.

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

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

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 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.

CKHA received HUD approval for this waiver and has begun implementing it. This waiver appears to reduce staff burden by saving a significant amount of time not following up with third parties for verification or waiting on tenants to provide the documentation.

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

No

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

\$50,000.

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

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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is

currently being implemented.

CKHA performs HQS Inspections on PBV units that it owns, manages/controls.

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 activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

CKHA owned, managed or controlled under the tenant-based and project-based voucher program.

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

CKHA received HUD approval for this waiver and has begun implementing it. This waiver has saved a significant amount of time and money by not paying outside sources and waiting on an opening in their schedule. This also allows for families to be housed more quickly.

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

No

Please explain or upload the description of the quality assurance method:

Following will explain the quality assurance method

CKHA will continue to meet the requirements under 24 CFR 982.401, while being a demonstration site for NSPIRE-V. Any staff member conducting inspections will be trained on the HQS standards. Participants will continue to be allowed to request an interim inspection. The CKHA staff member chosen, generally the Director of Voucher Management, will randomly select a sample of 5% of the inspections completed in the last 30 days to complete quality control selection.

CKHA will obtain the services of a third-party entity to determine if PHA-owned units pass HQS, upon the request of HUD.

No document is attached.

9.b. - Increase PBV Project Cap (HCV)**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

Increasing PBV project caps provides for more flexible use of housing units and increased choice for tenants.

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

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue

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

The MTW activity applies to all assisted households

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

CKHA received HUD approval for this waiver and has begun implementing it and will continue the process, which is expanding affordable housing to a wider audience.

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

No

9.g. - Increase PBV Rent to Owner (HCV)**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

CKHA is authorized to develop a local process to determine the initial and re-determined rent to owner. The agency may increase rents up to 120% of Fair Market Rents. CKHA will be implementing this activity within the Safe Harbor limits established by the MTW Operations Notice. CKHA will increase PBV rent to the owner to make it more attractive for landlords to participate in the program. This increases the availability of housing choices and makes it more likely that existing and new landlords will want to participate.

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

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

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

The MTW activity applies to all assisted households

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

This waiver has not yet been approved and is not yet implemented.

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

No

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

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

CKHA will establish the Program Coordinating Committee (PCC) in coordination with the American Job Center (AJC)/One-Stop, which houses several provider agencies in one building and allows for stronger and more frequent communication as the whole or with individual partnerships. This alternative PCC will provide support for the Family Self-Sufficiency program.

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

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

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

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

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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

This waiver has not yet been approved and has not been implemented.

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

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

The Family Self-Sufficiency Coordinator is a partner in the local American Job Center (AJC)/One-Stop, in which one building holds representatives from several provider agencies across the county and region. These partners hold meetings on a regular basis and when any partner is in need of specific resources.

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

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

CKHA will establish the Program Coordinating Committee (PCC) in coordination with the American Job Center (AJC)/One-Stop, which houses several provider agencies in one building and allows for stronger and more frequent communication as the whole or with individual partnerships. This alternative PCC will provide support for the Family Self-Sufficiency program.

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

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

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

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

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

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

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

This waiver has not yet been approved and not yet been implemented.

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

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

The Family Self-Sufficiency Coordinator is a partner in the local American Job Center (AJC)/One-Stop, in which one building holds representatives from several provider agencies across the county and region. These partners hold meetings on a regular basis and when any partner is in need of specific resources.

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

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>Yes</p> <p>Has there been a change in how the waiver is being implemented from when it was originally approved?</p> <p>No</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	\$4,652,043	\$0	2029-09-30
2022	\$5,038,721	\$5,038,721	\$0	2030-09-30
2023	\$5,354,602	\$4,017,181	\$1,337,441	2031-09-30
2024	\$5,757,580	\$0	\$5,757,580	2032-09-30

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

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

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

G.3	Substantially the Same (STS) – Local, Non-Traditional.	
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	# 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.
	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
Stepped and Tiered Rent Demonstration	Keith Olejniczak MDRC Keith.Olejniczak@mdrc.org 510-844-2306	March 1, 2023 (Official start) for the duration of the current MTW Demonstration Study	N/A

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 16, Program Administration (HCV) or Chapter 14, Grievances and Appeals (PH).

Charleston-Kanawha Housing Authority (CKHA)

MOVING TO WORK (MTW) HARDSHIP POLICY AFFECTING HOUSEHOLDS INELIGIBLE FOR THE RENT REFORM STUDY

This Hardship Policy applies to the following MTW activities (for those households INELIGIBLE for the Rent Reform Demonstration) expected to begin April 1, 2024:

- 1) Payment Standards (HCV) based on 120% of Fair Market Rent – waiver 2.b.
- 2) Project-Based Voucher Program Flexibilities (PBV) increasing rent to owner – waiver 9.g.
- 3) Reexaminations (PH & HCV) establishing a triennial reexamination schedule for households whose head of household (HOH) is 62 or above – waivers 3.a. & 3.b

Overview

The waivers above are intended to benefit assisted households by increasing payment standards (HCV) and rent to owner (PBV) resulting in increased housing choices available. Additionally, establishing a triennial reexamination schedule for elderly households allowing them to increase their income and/or benefits without an immediate increase in their total tenant payment (TTP) for HCV families or Tenant Rent for Public Housing residents. Elderly households will have an income examination every three years, and in between the triennial reexaminations their portion of rent will not increase. However, some households may need special accommodations when there is a decrease in income and/or benefits or extenuating circumstances. Non-Elderly households will continue to have annual reexaminations.

General Hardship Provisions

Hardships must be requested by the household in writing. 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. 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 experiences another adverse event, they may request an additional hardship. Hardship requests can be submitted up to twice in a calendar year.

Hardship Types, Criteria, and Remedies

I. **Hardship Due to a decrease in household income by 10% or more.**

A household will be eligible for this hardship exemption if they have a decrease in overall household income by 10% or more.

Elderly Households: When approved, the TTP/Tenant Rent amount determined by the hardship will remain in place until the next triennial reexamination.

Non-elderly households: When approved, the TTP/Tenant Rent amount determined by the hardship will remain in place until the next annual reexamination.

II. **Other Circumstances.** A household may request a hardship exemption for other circumstances, 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**.

Appeals

For procedures pertaining to grievance hearing requests based upon CKHA's denial of a hardship exemption, see Chapter 16, Program Administration (HCV) or Chapter 14, Grievances and Appeals (PH).

CKHA Agency Analysis of MTW Public Comments (2023)

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 the waiver that would establish alternative (triennial) reexamination schedule for households where the head of household is age 62 or older. The feedback was positive.

Some concerns regarding rent payment amounts increasing at the triennial recertification, due to the Cost-of-Living Adjustment (COLA), were expressed, though minimally. It was determined that these households would receive annual reminder letters in between the triennials. Additionally, a fact sheet about Hardships and submitting requests will be distributed, including the timeline of the approval process.

MTW Supplement Specific Questions/Comments

Regarding triennial recertifications for elderly households:

“That would be fantastic!”

“Just the fact that it (rent) wouldn’t go up for a few years, would be really happy.”

“I like that!”

“That’s good.”

“More money in your pocket for the next years.”

“Would the increase [at year 3] be very high?”

“If you go to three-year recerts, what is the next increase going to be based on?”

“Sounds good to me.”

“Would automatically know that [rent would increase at year 3 due to COLA].”

“Thank you.”

“Does that (MTW) only count for the ones that go out and get a job?”

“Could we qualify for that 3-year thing?”

**Charleston-Kanawha Housing Authority
MTW Impact Analysis (April 2024)**

MTW Activities	Reexaminations 3.a. Alternative Reexamination Schedule for Households (PH) – Elderly Households 3.b. Alternative Reexamination Schedule for Households (HCV) - Elderly Households
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>The overall impact on the agency’s finances is expected to be minimal. The increase in agency HAP is expected to be approximately \$16,315.21 annually, resulting in \$48,945.64 over three years. The potential loss of incoming rent payments from elderly households in Public Housing is expected to be \$14,064.65 annually, resulting in \$42,193.95 across three years.</p> <p>However, the agency anticipates that the savings from staff salary alone is \$61,789.00, equaling 2,874 hours of staff time.</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>The estimated average change in TTP of elderly households under triennial reexaminations as compared with the current policy is -\$0.07 annually for households with vouchers. Aggregating this average across the approximately 816 households, the average savings per household is \$59.98 across three years.</p> <p>The estimated average change in rent paid by elderly households under triennial reexaminations as compared with the current policy is -\$33.97 annually for elderly households in Public Housing. Aggregating this average across the approximately 414 households, the average savings per household is \$101.92 across the three years.</p>	
3. Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)	
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)	
There is minimal or no anticipated impact due to the availability of the hardship policy for families that need it.	
5. Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program	
No anticipated impact.	

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

It is anticipated to have a positive impact on the statutory goals of cost effectiveness, housing choice and self-sufficiency. Households could increase self-sufficiency by not having their payments increased annually, which could allow for greater housing choices. Both the agency and the households are expected to have decreased cost for triennial, rather than annual reexaminations.

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

There is no anticipated impact on the statutory requirements of ensuring 75% of households are very low income, assisting substantially the same total number of eligible low-income households and continuing to assist a comparable mix of households by family size. This change to triennial reexaminations is expected to encourage self-sufficiency, allowing for hardships if necessary.

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

Households who experience a loss of income between triennial reexaminations may request hardship exemptions, but this number is expected to be low as the majority of elderly households receive stable federal assistance. CKHA intends to track hardship requests to determine the impact of the policy on participant families and on staff time spent processing hardship requests.

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

No anticipated impact.

**Charleston-Kanawha Housing Authority
MTW Impact Analysis (April 2024)**

MTW Activities	<p>Payment Standards and Rent Reasonableness 2.b. Payment Standards – Fair Market Rents (HCV)</p> <p>Project-Based Voucher Program Flexibilities 9.g. Increase Rent to Owner (PBV)</p>
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>CKHA will likely pay more money towards rents in the areas that rent-reasonableness determinations allow landlords to charge rents that are higher than the HUD Fair Market Rent publication for the area. CKHA will increase the payment standard to 120% of the Fair Market Rent (increased from the current 110%). The increase in contract rent is expected to cost \$182,327 annually across all units.</p> <p>In terms of increasing rent to owner, it is anticipated that the agency will pay an increase of approximately \$12,476 monthly across all PBV units. However, some units are owned by the agency, which will offset the cost overall.</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>This waiver is not expected to increase the monthly amount that the tenant will pay as it is more likely that the particular unit’s contract rent will fall within the increased payment standards.</p>	
3. Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)	
<p>No anticipated impact.</p>	
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)	
<p>It is anticipated that the termination rate will decrease as landlords will be approved for higher rents, which will likely keep them in the program and make them less likely to terminate voucher contracts or the tenants.</p>	
5. Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program	
<p>It is anticipated that the utilization rate will increase due to an increased number of landlords that join and remain with CKHA. This is beneficial to families, increasing housing choices as well.</p>	

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

Anticipated to have a positive impact on the statutory goals of cost effectiveness, housing choice and self-sufficiency. This waiver allows for families to have increased income without going over the payment standards, encouraging them to stay in the units longer, increasing cost effectiveness due to not having vacancies or time/money spent cleaning out units.
In terms of increasing housing choice, this waiver in conjunction with increasing rent to owners (PVB) is expected to incentivize more landlords to participate and increase housing choice.

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

This waiver is not anticipated to have an impact on ensuring 75% of households are very low income, assisting substantially the same total number of eligible low-income households, and continuing to assist a comparable mix of households by family size as there is no expectation that it will change the individuals/families who apply, the majority of which qualify as very low-income and are of varied family size. This waiver is not expected to have a large impact on encouraging employment and self-sufficiency; however, it is possible that tenants may stay in units longer, making it less likely that they would have to end their employment due to location changes.

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

It is anticipated that there will be a minimal number of hardship requests as the tenant portion of payment will not change.

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

No anticipated impact.



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

CKHA Annual Plan & MTW Supplement Meetings - Public Comments (2023)

<u>DATE</u>	<u>TIME</u>	<u>LOCATION</u>	<u># ATTENDED</u>
10/10/23	11:00 am	Hillcrest Village	5
10/10/23	1:15 pm	Washington Manor	6
10/11/23	1:15 pm	Littlepage, Greystone, Patrick St., Legion, Prezioso Place	4
10/16/23	2:00 pm	Lee Terrace	21
10/17/23	11:00 am	CKHA Resident Councils & Resident Advisory Board	34
10/19/23	11:00 am	Dunbar (J.D. Anderson)	5
10/19/23	1:30 pm	South Park Village	12
10/20/23	11:00 am	Lippert Terrace	20
10/24/23	11:00 am	Oakhurst	5
10/24/23	2:00 pm	Jarrett Terrace	14
10/25/23	11:00 am	Rand (Albert Harris)	5
10/25/23	2:00 pm	Orchard Manor	19
10/26/23	2:00 pm	Carroll Terrace	30
11/28/23	11:00 am	Charleston-Kanawha Housing Authority Administrative Bldg.	5

Welcome & Introduction of CKHA staff.

Discussion of CKHA Annual Agency Plan for 2024 as a part of the larger Five-Year Agency Plan. This plan is a comprehensive guide to public housing agency policies, programs, operations, and strategies for meeting local housing needs and goals.

Strategic Priorities for the 2020 – 2024 Five-Year Plan:

1. Maintain, Improve and Expand Affordable Housing
2. Develop Additional Services/Partnerships
3. Build Diversified Business Model
4. Promote the Opportunities and Successes of Affordable Housing
5. Strengthen Organizational Operations

Additionally, the Moving to Work (MTW) Supplement for 2024 was discussed, including a reminder of the demonstration program goals and objectives, current waivers, and potential waivers to be requested. There are four waivers that were discussed for possible request.

1. Increasing payment standards in HCV to 120% of FMR.
2. Increase PBV rent to owner to 120% of FMR.
3. Create an alternative structure for securing local resources for the Program Coordinating Committee (PCC) – partnering with the American Job Center/One-Stop.
4. Establish alternative (triennial) reexamination schedule for households where the head of household is age 62 or older.

Handouts were provided for comments to be returned later or by persons who were not able to attend the meeting. The 45-day public comment period started October 1st and ended November 14th, 2023. Final meeting for public comment discussion held November 28, 2023.

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

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

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

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

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 McVey

Chair of Board of Commissioners

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

December 11, 2023

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.*