

PHA Name : Charleston/Kanawha Housing Authority

PHA Code : WV001

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 4/1/2022

PHA Program Type: Combined

MTW Cohort Number: 2

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

MTW Supplement Narrative

Charleston-Kanawha Housing Authority (CKHA) is an agency with over 80 years of experience providing decent, safe, and sanitary housing for low to moderate income residents. Our mission not only involves housing people, but also linking them to programs that will assist them on their journey to self-sufficiency. Service coordination and/or peer support services are available to all residents, including those in who live in Public Housing and participants in the Housing Choice Voucher (HCV) program.

CKHA's vision for the Moving to Work (MTW) Program aligns with our existing vision, to be the leader in providing and supporting quality affordable housing desired by individuals and families in our market area, encompassing two of the three statutory objectives: self-sufficiency and housing choice. We intend to be initiative-taking and innovative in our strategies and activities to increase cost effectiveness within the organization and increase self-sufficiency and housing choices of our residents.

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

MTW goals and activities are:

1. Reduce Cost and Achieve Greater Cost Effectiveness in Federal Expenditures

- Reduce the frequency of household certifications from one year to three years. This change allows participants to save or use increased income over this time, rather than having to pay higher rent. This also reduces the burden on participants, HCV, and Public Housing (PH) staff in acquiring, submitting, and processing paperwork
- Implement Waiver for Third-Party Requirement that would allow CKHA to inspect units on a more efficient schedule and to save time scheduling and cost of employing outside inspectors.
- Simplify rent calculations:
 - o Use tiered rent structure to look at previous year's gross income to determine resident rent amount
 - o Eliminate deductions for things such as number of children and childcare expenses
 - o Simplify the utility allowance schedule

These simplifications make rent and utility calculations more understandable for participants. Simplified paperwork benefits participants, staff, and property owners, as determination of household eligibility could be a faster process. Hardship exceptions are allowed for any participant where the changes create an unreasonable burden.

- Require documentation of assets over \$50,000 only. Reduces time and effort required for staff and for those participants, in the majority, with assets that fall below \$50,000.
- Modification to the Income Verification Hierarchy (Notice PIH 2018-18) to streamline the process for recertifications to EIV < Self-Certification.

Will continue to develop a strong IT infrastructure by continuing to modernize the website and create a CKHA MTW Facebook group, which will allow for ease of communication between staff and tenants.

2. Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient

- Provide onsite programming to allow for ease of access for tenants
 - o After school programming
 - o Medical care mobile units
 - o Personal hygiene pantries
 - o Peer Recovery Coaching
 - o VITA tax preparation
 - o Food pantries & Food box delivery (when needed)
- Ability to address multiple needs/services at the same time, decreasing the frustration, cost, and confusion of trying to reach out to multiple agencies individually.
 - o Provider fairs onsite that have multiple services, such as:
 - Enrollment for free community college programming
 - Enrollment for free Pre-K and Kindergarten
 - Enrollment for high school equivalency classes/testing
 - Enrollment for childcare assistance subsidies
 - Domestic Violence/Substance Use Services so that a tenant may seek services but be identified as directly seeking the service due to other providers present
 - o One-Stop via the Workforce Investment Board (WIBKC) and Human Resource Development Foundation (HRDF) where providers across multiple categories are virtually or physically (when possible) in one place for ease of access
- Ability to have one on one assessments and goal planning sessions with CKHA staff to address any barriers the tenant may be facing, including finding childcare, completing online applications, or finding school and/or holiday resources for families.
- CKHA has strong partnerships with many agencies that readily accept referrals and provide services to tenants, such as:

o WV Works/Department of Health & Human Resources, WIBKC and HRDF all provide funding for training and education, but also for necessary clothing, transportation, and equipment necessary to be successful in employment or the educational/vocational program.

o Jobs & Hope provides individualized services for those seeking employment that have significant barriers. Barriers could include but are not limited to owing money before can regain driver's license, needing to obtain High School Equivalency, having items on a background check, or needing to obtain current identification documents.

o City of Charleston's Workforce Initiative that assists with employment and training programs.

- Ability to self-certify assets up to \$50,000 without having to provide burdensome paperwork
- Hardship requests available to provide a safety net if a family has a loss of income or benefits.
- Provide workshops/sessions on various service related to increasing self-sufficiency, such as:

o Banking services

o Home ownership

o Credit review and counseling

o Having an emergency fund

o Emergency/disaster preparation

3. Increase Housing Choices for Low-Income Families

• Increase Project-Based Voucher (PBV) Project Cap up to 100%. This will increase the number of units available and provide for more flexible use of housing units and increased choice for tenants.

• Provide additional help with searching for appropriate housing, including one-on-one support. This change would allow funding flexibilities so that the current person in this role could spend time more directly helping tenants, thereby, resulting in more efficient matching to vacant units, fill units more quickly, and improve long-term relationships with property owners.

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

| 1. Tenant Rent Policies | |
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| a. Tiered Rent (PH) | Plan to Implement in the Submission Year |
| b. Tiered Rent (HCV) | Plan to Implement in the Submission Year |
| 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) | Plan to Implement in the Submission Year |
| j. Alternative Utility Allowance (HCV) | Plan to Implement in the Submission Year |
| k. Fixed Rents (PH) | Not Currently Implemented |
| l. Fixed Subsidy (HCV) | Not Currently Implemented |
| m. Utility Reimbursements (PH) | Not Currently Implemented |
| n. Utility Reimbursements (HCV) | 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) | Plan to Implement in the Submission Year |
| s. Elimination of Deduction(s) (HCV) | Plan to Implement in the Submission Year |
| t. Standard Deductions (PH) | Not Currently Implemented |
| u. Standard Deductions (HCV) | Not Currently Implemented |
| v. Alternative Income Inclusions/Exclusions (PH) | Not Currently Implemented |
| w. Alternative Income Inclusions/Exclusions (HCV) | Not Currently Implemented |
| 2. Payment Standards and Rent Reasonableness | |
| a. Payment Standards- Small Area Fair Market Rents (HCV) | Not Currently Implemented |
| b. Payment Standards- Fair Market Rents (HCV) | Not Currently Implemented |
| c. Rent Reasonableness – Process (HCV) | Not Currently Implemented |
| d. Rent Reasonableness – Third-Party Requirement (HCV) | Plan to Implement in the Submission Year |
| 3. Reexaminations | |
| a. Alternative Reexamination Schedule for Households (PH) | Plan to Implement in the Submission Year |
| b. Alternative Reexamination Schedule for Households (HCV) | Plan to Implement in the Submission Year |
| c. Self-Certification of Assets (PH) | Plan to Implement in the Submission Year |
| d. Self-Certification of Assets (HCV) | Plan to Implement in the Submission Year |
| 4. Landlord Leasing Incentives | |
| a. Vacancy Loss (HCV-Tenant-based Assistance) | Not Currently Implemented |
| b. Damage Claims (HCV-Tenant-based Assistance) | Not Currently Implemented |
| c. Other Landlord Incentives (HCV- Tenant-based Assistance) | Not Currently Implemented |
| 5. Housing Quality Standards (HQS) | |
| a. Pre-Qualifying Unit Inspections (HCV) | Not Currently Implemented |
| b. Reasonable Penalty Payments for Landlords (HCV) | Not Currently Implemented |
| c. Third-Party Requirement (HCV) | Plan to Implement in the Submission Year |
| d. Alternative Inspection Schedule (HCV) | Not Currently Implemented |
| 6. Short-Term Assistance | |
| a. Short-Term Assistance (PH) | Not Currently Implemented |
| b. Short-Term Assistance (HCV) | Not Currently Implemented |
| 7. Term-Limited Assistance | |
| a. Term-Limited Assistance (PH) | Not Currently Implemented |
| b. Term-Limited Assistance (HCV) | Not Currently Implemented |
| 8. Increase Elderly Age (PH & HCV) | |
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| 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) | Plan to Implement in the Submission Year |
| c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV) | Not Currently Implemented |
| d. Alternative PBV Selection Process (HCV) | Not Currently Implemented |
| e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV) | Not Currently Implemented |
| f. Increase PBV HAP Contract Length (HCV) | Not Currently Implemented |
| g. Increase PBV Rent to Owner (HCV) | Not Currently Implemented |
| h. Limit Portability for PBV Units (HCV) | Not Currently Implemented |
| 10. Family Self-Sufficiency Program with MTW Flexibility | |
| a.PH Waive Operating a Required FSS Program (PH) | Not Currently Implemented |
| a.HCV Waive Operating a Required FSS Program (HCV) | Not Currently Implemented |
| b.PH Alternative Structure for Establishing Program Coordinating Committee (PH) | Not Currently Implemented |
| b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV) | Not Currently Implemented |
| c.PH Alternative Family Selection Procedures (PH) | Not Currently Implemented |
| c.HCV Alternative Family Selection Procedures (HCV) | Not Currently Implemented |
| d.PH Modify or Eliminate the Contract of Participation (PH) | Not Currently Implemented |
| d.HCV Modify or Eliminate the Contract of Participation (HCV) | Not Currently Implemented |
| e.PH Policies for Addressing Increases in Family Income (PH) | Not Currently Implemented |
| e.HCV Policies for Addressing Increases in Family Income (HCV) | Not Currently Implemented |
| 11. MTW Self-Sufficiency Program | |
| a.PH Alternative Family Selection Procedures (PH) | Not Currently Implemented |
| a.HCV Alternative Family Selection Procedures (HCV) | Not Currently Implemented |
| b.PH Policies for Addressing Increases in Family Income (PH) | Not Currently Implemented |
| b.HCV Policies for Addressing Increases in Family Income (HCV) | Not Currently Implemented |
| 12. Work Requirement | |
| a. Work Requirement (PH) | Not Currently Implemented |
| b. Work Requirement (HCV) | Not Currently Implemented |
| 13. Use of Public Housing as an Incentive for Economic Progress (PH) | |
| Use of Public Housing as an Incentive for Economic Progress (PH) | Not Currently Implemented |
| 14. Moving on Policy | |
| a. Waive Initial HQS Inspection Requirement (HCV) | Not Currently Implemented |
| b.PH Allow Income Calculations from Partner Agencies (PH) | Not Currently Implemented |
| b.HCV Allow Income Calculations from Partner Agencies (HCV) | Not Currently Implemented |
| c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH) | Not Currently Implemented |
| c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV) | Not Currently Implemented |
| 15. Acquisition without Prior HUD Approval (PH) | |
| Acquisition without Prior HUD Approval (PH) | Not Currently Implemented |
| 16. Deconcentration of Poverty in Public Housing Policy (PH) | |
| Deconcentration of Poverty in Public Housing Policy (PH) | Not Currently Implemented |
| 17. Local, Non-Traditional Activities | |
| a. Rental Subsidy Programs | Not Currently Implemented |
| b. Service Provision | Not Currently Implemented |

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

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| 1.a. - Tiered Rent (PH) |
| CKHA believes the Test Rent #1-Tiered Rent (Income-Based) would be the best fit for our agency. Two reasons for our decision are: (1) our geographic area and (2) current economic state. We are confident that this rent structure along with community partnerships could potentially increase our family's self-sufficiency. CKHA has already eliminated interims in the HCV program for family's that experience an increase in income until their next annual reexamination. As an agency, we felt that this policy change would allow the families an opportunity to gain greater momentum toward self-sufficiency. It would also reduce administrative burden in the calculation of rent and simplify the program both for staff and for residents. |
| This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency |
| This MTW activity serves the following statutory objectives: Decreased expenditures |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households |
| This MTW activity applies to: New admissions and currently assisted households |
| An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types |
| This MTW activity applies to the following Public Housing developments: (for those households selected to participate in MTW) WV001000003 Orchard Manor WV001000007 Hillcrest - Oakhurst WV001000008 South Park Village WV001000027 CRH LP 1 WV001000028 CRH LP 2 WV001000029 Harris(Rand)/Anderson (Dunbar) WV001000031 CRH LP 3 WV001000032 CRH LP6 WV001000033 CRH LP 5 WV001000036 Starling Drive WV001000037 729 Central Avenue WV001000038 731 Central Avenue |
| N/A |
| This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D). |
| No hardship were requested in the most recent fiscal year. |
| In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| The Tiered Rent chart would consist of 31 tiers, with the income increasing by \$2,499 per tier. The tiered rent payments are set at 28% of gross annual income in the midpoint of the income tier. |
| Please see attached tiered rent policy table that shows the income bands. |
| The rent will be based on tiers of household income. Please see attached for the table on the tiered rent policy table that shows the income bands. |
| This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) |
| This activity uses different definition of income because we are using the following MTW waivers: 1.r. and/or 1.s. "elimination of deductions" |

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| 1.b. - Tiered Rent (HCV) |
| CKHA believes the Test Rent #1-Tiered Rent (Income-Based) would be the best fit for our agency. Two reasons for our decision are: (1) our geographic area and (2) current economic state. We are confident that this rent structure along with community partnerships could potentially increase our family's self-sufficiency. CKHA has already eliminated interims in the HCV program for family's that experience an increase in income until their next annual reexamination. As an agency, we felt that this policy change would allow the families an opportunity to gain greater momentum toward self-sufficiency. It would also reduce administrative burden in the calculation of rent and simplify the program both for staff and for residents. |
| This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency |
| This MTW activity serves the following statutory objectives: Decreased expenditures |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households |
| This MTW activity applies to: New admissions and currently assisted households |
| An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types |
| This MTW activity applies to the following housing choice voucher unit types: The activity will apply to non-elderly, non-disabled (selected as MTW program participants) under both the tenant based and project based voucher programs. All special programs, VASH, EHV, Shelter Plus Care, Mainstream vouchers will be excluded. |
| N/A |
| This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D). |
| No hardship were requested in the most recent fiscal year. |
| In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| The Tiered Rent chart would consist of 31 tiers, with the income increasing by \$2,499 per tier. The tiered rent payments are set at 28% of gross annual income in the midpoint of the income tier. |
| Please see attached tiered rent policy table that shows the income bands. |
| The rent will be based on tiers of household income. Please see attached for the table on the tiered rent policy table that shows the income bands. |
| This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) This activity uses different definition of income because we are using the following MTW waivers: 1.r. and/or 1.s. "elimination of deductions" |

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| 1.i. - Alternative Utility Allowance (PH) |
| CKHA will utilize a simplified utility allowance schedule for all unit types, which will allow for an easier calculation method for staff and help families to better understand their rental payments. It will be based on the most common structure type, number of bedrooms and a base payment on the most common utilities. CKHA will follow required safe harbors: 1. The utility schedule must be based upon number of bedrooms, the property location, and/or the types of utilities paid by participant. 2. The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule. 3. The agency must not include items in the utility schedule that are excluded under HUD regulations. |
| This MTW activity serves the following statutory objectives: Cost effectiveness |

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| Housing choice |
| This MTW activity serves the following statutory objectives: Decreased expenditures |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households |
| N/A |
| No hardship were requested in the most recent fiscal year. |
| In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| CKHA plans to implement a simplified utility allowance, a single utility schedule for all units and localities. The current utility schedule consists of nine localities and five unit classifications and the new utility schedule will use the most common housing structure and a base payment. The base payment will contain the most common utilities and less common utilities can be add-ons. The objectives are: 1.) less administrative burden on data entry and maintain the vast amounts of data, 2.) less affordability errors when selecting program participants or landlord responsibilities, unit type, and locality, and 3.) improved communication to program participants and landlords on what a family can afford. |

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| 1.j. - Alternative Utility Allowance (HCV) |
| CKHA will utilize a simplified utility allowance schedule, which will allow for an easier calculation method for staff and help families to better understand their rental payments. It will be based on the most common structure type, number of bedrooms and a base payment on the most common utilities. CKHA will follow required safe harbors: 1. The utility schedule must be based upon number of bedrooms, the property location, and/or the types of utilities paid by participant. 2. The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule. 3. The agency must not include items in the utility schedule that are excluded under HUD regulations. |
| This MTW activity serves the following statutory objectives: Cost effectiveness Housing choice |
| This MTW activity serves the following statutory objectives: Decreased expenditures |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households |
| N/A |
| No hardship were requested in the most recent fiscal year. |
| In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| CKHA plans to implement a simplified utility allowance, a single utility schedule for all units and localities. The current utility schedule consists of nine localities and five unit classifications and the new utility schedule will use the most common housing structure and a base payment. The base payment will contain the most common utilities and less common utilities can be add-ons. The objectives are: 1.) less administrative burden on data entry and maintain the vast amounts of data, 2.) less affordability errors when selecting program participants or landlord responsibilities, unit type, and locality, and 3.) improved communication to program participants and landlords on what a family can afford. |

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| 1.r. - Elimination of Deduction(s) (PH) |
| CKHA will eliminate all deductions and use gross income to calculate tenant rent, which will allow for an easier and more timely calculation method for staff and help families to better understand their rental payments. |
| This MTW activity serves the following statutory objectives: Cost effectiveness |

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| This MTW activity serves the following statutory objectives: Decreased expenditures |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households |
| This MTW activity applies to: New admissions and currently assisted households |
| An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types |
| This MTW activity applies to the following Public Housing developments: (for those households selected to participate in MTW) WV001000003 Orchard Manor WV001000007 Hillcrest - Oakhurst WV001000008 South Park Village WV001000027 CRH LP 1 WV001000028 CRH LP 2 WV001000029 Harris(Rand)/Anderson (Dunbar) WV001000031 CRH LP 3 WV001000032 CRH LP6 WV001000033 CRH LP 5 WV001000036 Starling Drive WV001000037 729 Central Avenue WV001000038 731 Central Avenue |
| N/A |
| This MTW activity requires a Hardship Policy. The Hardship Policy is attached. |
| Attached Hardship policy applies to: 1.r. - Elimination of Deduction(s) (PH) 1.s. - Elimination of Deduction(s) (HCV) 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)} |
| No hardship were requested in the most recent fiscal year. |
| In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| This MTW activity requires an Impact Analysis. The Impact Analysis is attached. |
| The Impact Analysis that applies to this MTW activity also applies to the following MTW activities: 1.r. - Elimination of Deduction(s) (PH) 1.s. - Elimination of Deduction(s) (HCV) 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV) |
| Following deduction(s) will be eliminated, modified, or added. Dependent allowance Unreimbursed childcare costs N/A |

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| 1.s. - Elimination of Deduction(s) (HCV) |
| CKHA will eliminate all deductions and use gross income to calculate tenant rent, which will allow for an easier and more timely calculation method for staff and help families to better understand their rental payments. |
| This MTW activity serves the following statutory objectives: Cost effectiveness |
| This MTW activity serves the following statutory objectives: Decreased expenditures |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households |
| This MTW activity applies to: |

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| New admissions and currently assisted households |
| An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types |
| This MTW activity applies to the following housing choice voucher unit types: The activity will apply to non-elderly, non-disabled households (selected as MTW program participants) under both the tenant based and project based voucher programs. All special programs, VASH, EHV, Shelter Plus Care, Mainstream vouchers will be excluded. |
| N/A |
| This MTW activity requires a Hardship Policy. The Hardship Policy is attached. |
| No hardship were requested in the most recent fiscal year. |
| In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| This MTW activity requires an Impact Analysis. The Impact Analysis is attached. |
| Following deduction(s) will be eliminated, modified, or added. Dependent allowance Unreimbursed childcare costs N/A |

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| 2.d. - Rent Reasonableness – Third-Party Requirement (HCV) |
| This waiver applies to CKHA owned and operated properties. CKHA will use a process that includes obtaining reasonable rent determinations from The Nelrod Company and their national database. This will ensure fair and valid determinations and will increase cost effectiveness and decrease staff administrative burden. CKHA will follow safe harbors, including: 1. The agency shall establish and make available a quality assurance method to ensure impartiality. 2. The agency shall make available the method used to determine that rents charged by owners to vouchers participants are reasonable when compared to similar unassisted unites in the market area. 3. At the Department’s request, the agency must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units. |
| This MTW activity serves the following statutory objectives: Cost effectiveness |
| This MTW activity serves the following statutory objectives: Decreased expenditures |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households |
| N/A |
| No hardship were requested in the most recent fiscal year. |
| In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| Following will explain quality assurance method: Note: Attached document covers BOTH Quality Assurance Method & Rent Reasonableness Determination Method. i. Quality assurance method to ensure impartiality – CKHA currently utilizes a third party to verify rent reasonableness for units. The third party agency has a Statement of Compliance with Reasonable Rent Regulations, see blow. The system was designed to correct long-standing misconceptions and problems about reasonable rent analysis. For example, other systems allow the Agency Analyst to select the comparable units, allowing for possible favoritism, subjectivity, and Fair Housing Issues. The third party agency automatically selects the best comparable units in the database using consistent and objective methods. In another example, some systems look for comparable units based only on the same or similar rents. They do not account for differences in the characteristics between the assisted and comparable units. The system uses the standard deviation method to enable proper comparisons of the unit to be assisted and comparable units with different characteristics, assuring the Agency that an “apples-to-apples” comparison is made. |

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

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

3. Internal QC

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

Following will explain rent reasonableness determination method:

Note: Attached document covers BOTH Quality Assurance Method & Rent Reasonableness Determination Method.

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

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

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

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

I. Step-by Step Explanation of Procedures

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

Preparation: Use of Location

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

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

Preparation: Assigning Maximum Value Points to HUD Required Characteristics

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

Value Point Levels Applied to Each Characteristic

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

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

Characteristic Value Point Level Value Point Range

Location V 15-23
 HQS Quality IV 10-18
 Utilities Provided by Owner IV 0-18
 Building Structure (Unit Type) IV 10-18
 Overall Unit Size III 8-13
 Number of Bedrooms II 4-9
 Number of Bathrooms II 4-9
 Age II 4-9
 Amenities II 0-9
 Maintenance I 1-5
 Housing Services I 0-5 and attached for rent reasonableness determination method

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

CKHA will establish an alternative (triennial) reexamination schedule (allowing for adjusting via hardship policy if gross income drops into a lower tier). This will be more efficient for both staff and tenants and will allow tenants to increase their overall self-sufficiency by not being required to report increased income and pay an increased rental payment until the next triennial reexamination. Additionally, it is anticipated that tenants will have increased housing choices due to increased accessible income. Decreased staff time on completing annual recertifications will also improve cost effectiveness and decrease administrative burden. CKHA is requesting a waiver for the safe harbor stating that the agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. The decrease in household income is covered in the Hardship Policy, where the household may request a Hardship Exception, where there is no limit to the number of Hardship Exceptions that the household may request, rather than the allowance of an interim.

This MTW activity serves the following statutory objectives:
 Cost effectiveness
 Self-sufficiency
 Housing choice

This MTW activity serves the following statutory objectives:
 Decreased revenue

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:
 New admissions and currently assisted households

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

This MTW activity applies to the following Public Housing developments: (for those households selected to participate in MTW)
 WV001000003 Orchard Manor
 WV001000007 Hillcrest - Oakhurst
 WV001000008 South Park Village
 WV001000027 CRH LP 1
 WV001000028 CRH LP 2
 WV001000029 Harris(Rand)/Anderson (Dunbar)
 WV001000031 CRH LP 3
 WV001000032 CRH LP6
 WV001000033 CRH LP 5
 WV001000036 Starling Drive
 WV001000037 729 Central Avenue
 WV001000038 731 Central Avenue

N/A

This MTW activity requires a Safe Harbor Waiver.
 The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency
 Received 0 hardship requests

| |
|--|
| Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| This MTW activity requires an Impact Analysis. The Impact Analysis is attached. |
| Recertification Schedule is Once every three years |
| Household may request 0 interim recertifications per year. |
| Rather than having a possible annual interim, there will be a hardship policy in effect if a family's gross income drops into a lower tier based on the following criteria: family has experienced a decrease in income because of changed circumstances, including the loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance; family has experienced an increase in expenses because of changed circumstances, medical costs, childcare, transportation, education, or similar items; family has lost eligibility for, or is awaiting an eligibility determination for a Federal, State, or local assistance program; or family has received a notice to vacate within the next 30 days for non-payment of rent because of the inability to pay the tiered rent required. They may request that their hardship be extended due to continuing circumstances. |

| |
|---|
| 3.b. - Alternative Reexamination Schedule for Households (HCV) |
| CKHA will establish an alternative (triennial) reexamination schedule (allowing for adjusting via hardship policy if gross income drops into a lower tier). This will be more efficient for both staff and tenants and will allow tenants to increase their overall self-sufficiency by not being required to report increased income and pay an increased rental payment until the next triennial reexamination. Additionally, it is anticipated that tenants will have increased housing choices due to increased accessible income. This process should decrease administrative burden and improve cost effectiveness. CKHA is requesting a waiver for the safe harbor stating that the agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. The decrease in household income is covered in the Hardship Policy, where the household may request a Hardship Exception, where there is no limit to the number of Hardship Exceptions that the household may request, rather than the allowance of an interim. |
| This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency Housing choice |
| This MTW activity serves the following statutory objectives: Decreased revenue |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households |
| This MTW activity applies to: New admissions and currently assisted households |
| An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types |
| This MTW activity applies to the following housing choice voucher unit types: The activity will apply to non-elderly, non-disabled households (selected as MTW program participants) under both the tenant based and project based voucher programs. All special programs, VASH, EHV, Shelter Plus Care, Mainstream vouchers will be excluded. |
| N/A |
| This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D). |
| This MTW activity requires a Hardship Policy. The Hardship Policy is attached. |
| No hardship were requested in the most recent fiscal year. |
| In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| This MTW activity requires an Impact Analysis. The Impact Analysis is attached. |
| Recertification Schedule is Once every three years |
| Household may request 0 interim recertifications per year. |
| As an alternative to requesting an interim, there will be a hardship policy in effect if a family's gross income drops |

into a lower tier based on the following criteria: family has experienced a decrease in income because of changed circumstances, including the loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance; family has experienced an increase in expenses because of changed circumstances, medical costs, childcare, transportation, education, or similar items; family has lost eligibility for, or is awaiting an eligibility determination for a Federal, State, or local assistance program; or family has received a notice to vacate within the next 30 days for non-payment of rent because of the inability to pay the tiered rent required. They may request that their hardship be extended due to continuing circumstances.

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

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

This MTW activity serves the following statutory objectives:

- Cost effectiveness
- Self-sufficiency

This MTW activity serves the following statutory objectives:

- Neutral (no cost implications)

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

N/A

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency

- Received 0 hardship requests
- Approved hardship requests
- Denied hardship requests
- There is\are hardship requests pending.

The dollar threshold for the self-certification of assets is \$50,000.

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

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

This MTW activity serves the following statutory objectives:

- Cost effectiveness
- Self-sufficiency
- Housing choice

This MTW activity serves the following statutory objectives:

- Neutral (no cost implications)

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

N/A

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency

- Received 0 hardship requests
- Approved hardship requests
- Denied hardship requests
- There is\are hardship requests pending.

The dollar threshold for the self-certification of assets is \$50,000.

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

CKHA will perform HQS Inspections on PBV units that it owns, manages, and/or controls. To ensure objective analysis,

the Director of Leased Housing will randomly select a sample of Quality Control (QC) inspections that have been completed within the last 30 days. The number of QC inspections will equal 5%. CKHA will follow all safe harbors:

1. The agency shall establish and make available a quality assurance method to ensure an objective analysis.
2. The participant must be able to request an interim inspection.
3. HQS inspection standards must not be altered as found at 24 CKR 982.401.
4. At the Department's request, the agency must obtain the services of a third-party entity to determine if PHA-owned units pass HQS.

This MTW activity serves the following statutory objectives:
Cost effectiveness

This MTW activity serves the following statutory objectives:
Decreased expenditures

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

N/A

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

The quality assurance method:
Following will explain the quality assurance method –
If [Upload file] options- Display 'Attached for quality assurance method"

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

Increasing PBV project caps will allow CKHA to increase the number of units within a building without HUD approval. It will provide for more flexible use of housing units and increased choice for tenants. this change will increase the number of units available for extremely low income families needing a high level of rental assistance. It will also preserve existing affordable housing allowing for redevelopment of aging out housing developments. CKHA will follow the safe harbor: The agency is subject of Notice PIH 2013-27 where applicable, or its successor.

This MTW activity serves the following statutory objectives:
Cost effectiveness
Housing choice

This MTW activity serves the following statutory objectives:
Increased revenue

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

N/A

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

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

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

17.c. - Housing Development Programs

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Charleston/Kanawha Housing Authority MTW agency
 Received 0 hardship requests
 Approved hardship requests
 Denied hardship requests
 There is\are hardship requests pending.

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

| Name of Development and Address | MTW Role: Acquisition, Rehabilitation, New Construction? | Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other | Number of Affordable Units | Total Number of Units | Number of Units by Affordability - 80% of AMI | Number of Units by Affordability - 50% of AMI | Number of Units by Affordability - 30% of AMI | Number of Units by Affordability - Other |
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|

Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

| Name of Development and Address | MTW Role: Acquisition, Rehabilitation, New Construction? | Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other | Number of Affordable Units | Total Number of Units | Number of Units by Affordability - 80% of AMI | Number of Units by Affordability - 50% of AMI | Number of Units by Affordability - 30% of AMI | Number of Units by Affordability - Other |
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|

Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

| Name of Development and Address | MTW Role: Acquisition, Rehabilitation, New Construction? | Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other | Number of Affordable Units | Total Number of Units | Number of Units by Affordability - 80% of AMI | Number of Units by Affordability - 50% of AMI | Number of Units by Affordability - 30% of AMI | Number of Units by Affordability - Other |
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|

Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

| Name of Development and Address | MTW Role: Acquisition, Rehabilitation, New Construction? | Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other | Number of Affordable Units | Total Number of Units | Number of Units by Affordability - 80% of AMI | Number of Units by Affordability - 50% of AMI | Number of Units by Affordability - 30% of AMI | Number of Units by Affordability - Other |
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|

| | |
|------------|--|
| D. | Safe Harbor Waivers. |
| D.1 | Safe Harbor Waivers seeking HUD Approval: Please see attached for Safe Harbor Waivers requested this year. |

| | |
|------------|---|
| E. | Agency-Specific Waiver(s). |
| E.1 | Agency-Specific Waiver(s) for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested. Please see attached for Agency-Specific Waiver(s) requested this year. |
| E.2 | Agency-Specific Waiver(s) for which HUD Approval has been Received: MTW Agency does not have approved Agency-Specific Waivers |

| | |
|------------|--|
| F. | Public Housing Operating Subsidy Grant Reporting. |
| F.1 | Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency. |

| Federal Fiscal Year (FFY) | Total Operating Subsidy Authorized Amount | How Much PHA Disbursed by the 9/30 Reporting Period | Remaining Not Yet Disbursed | Deadline |
|----------------------------------|--|--|------------------------------------|-----------------|
| 2021 | \$4,652,043 | \$3,457,730 | \$1,194,313 | 2029-09-30 |
| 2022 | \$780,566 | \$390,283 | \$390,283 | 2030-09-30 |
| 2023 | \$0 | \$0 | \$0 | 2031-09-30 |
| 2024 | \$0 | \$0 | \$0 | 2032-09-30 |
| 2025 | \$0 | \$0 | \$0 | 2033-09-30 |

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

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

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

| | |
|---|---|
| G.3 | Substantially the Same (STS) – Local, Non-Traditional. |
| The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year. | 0 # of unit months |
| The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year. | 0 # of unit months |

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

| PROPERTY NAME/ ADDRESS | 0/1 BR | 2 BR | 3 BR | 4 BR | 5 BR | 6+ BR | TOTAL UNITS | POPULATION TYPE* | if 'Population Type' is Other | # of Section 504 Accessible (Mobility)** | # of Section 504 Accessible (Hearing/ Vision) | Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year? | What was the Total Amount of MTW Funds Invested into the Property? |
|------------------------|--------|------|------|------|------|-------|-------------|------------------|-------------------------------|--|---|---|--|
|------------------------|--------|------|------|------|------|-------|-------------|------------------|-------------------------------|--|---|---|--|

| | |
|---|--|
| G.4 | Comparable Mix (by Family Size) – Local, Non-Traditional. |
| To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table. | |

| Family Size: | Occupied Number of Local, Non-Traditional units by Household Size |
|--------------|---|
| 1 Person | 0 |
| 2 Person | 0 |
| 3 Person | 0 |
| 4 Person | 0 |
| 5 Person | 0 |
| 6+ Person | 0 |
| Totals | 0 |

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

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

Table I.1 - Evaluations of MTW Policies

| Title and short description | Evaluator name and contact information | Time period | Reports available |
|---|---|---|-------------------|
| The PHA participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce PHA administrative burdens. An independent research team lead by MDRC will work with HUD and the selected PHAs to assist in implementation and evaluate the effects of the alternative rent policies. | Keith Olejniczak MDRC Keith.olejniczak@mdrc.org (510) 844-2306 Don Davis, MPA Director of Professional Services ddavis@bronnergroup.com O 312.759.5101 D 312.265.6408 C 773.332.9638 | Beginning August 1, 2022 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 14, Grievances and Appeals.



Charleston-Kanawha Housing Authority

P.O. Box 86 • Charleston, West Virginia 25321-0086
1525 Washington Street, W • Charleston, West Virginia 25387
304-348-6451 • Fax 304-348-6454 • TDD 304-348-6840

MOVING TO WORK (MTW) REQUEST FOR HARDSHIP EXCEPTION

Printed Name: _____ Program: HCV _____ or PH _____

I formally request an exception to allow payment of rent at a lower tier because of the following hardship. The specified tiered rent requirement will be suspended beginning the first of the month following your request and the tiered rent that is correlated to your current income based on your hardship request will be applied. CKHA will then determine whether the financial hardship exists and will make a determination within 14 business days from the date this form is returned. Please check applicable reason and provide details in the space below.

- My family has experienced a hardship due to elimination of deductions related to having \$2,500 or more out-of-pocket childcare expenses.
- My family has experienced a hardship due to reduced income that puts current gross income at a lower income tier category than the tier previously calculated.
- My family is experiencing a hardship due to other circumstances that puts current gross income at a lower income tier category than the tier previously calculated.

HOUSEHOLD'S CURRENT GROSS INCOME? _____

Please complete the section below with additional information for the hardship request:

I understand that I must provide documentation proving the hardship as determined by CKHA and that all household income will be evaluated. If CKHA determines that the request did not meet hardship standards, any retroactive rent will be collected, if applicable, through a reasonable payment agreement. **I UNDERSTAND THAT, IF APPROVED, THIS HARDSHIP AGREEMENT WILL BE IN EFFECT FOR 6 MONTHS ONLY.** If the hardship falls into the "other circumstances" category, the agreement will be for two months at \$50 minimum rent. I understand that any additional hardship requests will be determined independently by CKHA as separate requests.

I understand that I have the right to an informal hearing under grievance or hearing procedures of a Housing Authority's denial of hardship request.

I understand the above information and I have had the opportunity to ask questions.

Signature: _____ Date: _____



CKHA Staff use only:

Staff Name: _____ Date received: _____

Rent at last recert. \$ _____ Tier: _____ Rent at decreased amount \$ _____ Tier: _____

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

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

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

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

Reexaminations

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

Agency-specific waiver

No anticipated impact.

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

Tenant Rent Policies

No anticipated impact.

Reexaminations

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

Agency-specific waiver

No anticipated impact.

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

Tenant Rent Policies

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

Reexaminations

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

Agency-specific waiver

No anticipated impact.

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

Tenant Rent Policies

No anticipated impact

Reexaminations

No anticipated impact.

Agency-specific waiver

No anticipated impact.

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

Tenant Rent Policies

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

Reexaminations

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

Agency-specific waiver

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

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

Tenant Rent Policies

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

Reexaminations

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

Agency-specific waiver

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

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

Tenant Rent Policies

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

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

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

Reexaminations

No anticipated impact.

Agency-specific waiver

No anticipated impact.

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

Tenant Rent Policies

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

Reexaminations

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

Agency-specific waiver

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



Tiered Rent Chart (28% midpoint)

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

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

Core Waiver Questions

| |
|--|
| <p>Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency’s goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.</p> |
| <p>CKHA is proposing to modify the Income Verification Hierarchy that is posted in Notice PIH 2018-18. Instead, CKHA will use EIV for recertifications and then have resident self-certify the retrospective income, for both HCV and Public Housing.</p> <p>This MTW activity will enable CKHA to streamline the collection of retrospective income information. This process will greatly decrease staff administrative burden and make the retrospective income verification process more efficient for both staff and participant.</p> |
| <p>Which of the MTW statutory objectives does this MTW activity serve?</p> |
| <p>Cost effectiveness</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 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 activities applies to a subset 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>Both 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>If Other Selected in Previous Question: Please describe this target population.</p> |
| <p>N/A</p> |
| <p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> |

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

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

MTW Safe Harbor Waiver Request - Charleston-Kanawha Housing Authority

CKHA requests a Safe Harbor Waiver for the following group of MTW activities:

Tenant Rent Policies

- 1.a. Tiered Rent (PH)
- 1.b. Tiered Rent (HCV)

Reexaminations

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

1. Tenant Rent Policies

The agency is authorized to adopt and implement the activities listed below for setting tenant rents in public housing, including but not limited to establishing definitions of income and adjusted income that differ from those in the current 1937 Act and its implementing regulations. The agency is authorized to adopt and implement the activities listed below to establish total tenant payments (TTP) in the HCV program, and/or tenant rents for tenant-based and project-based voucher (PBV) assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The agency is authorized to adopt and implement the activities listed below to calculate the tenant portion of the rent in a way that differs from the currently mandated program requirements in the 1937 Act and its implementing regulations. The agency must determine initial eligibility in accordance with 24 CFR 5.609 and must comply with section 3(b)(2) of the United States Housing Act of 1937 Act (1937 Act) (42 U.S.C. §1437). For voucher activities, the Department has developed a standard rider to the HAP contract that reflects any MTW authorizations that amend the current requirements of the HAP contract.

1.a. Tiered Rent (PH) – The agency may implement changes to the tenant rent calculation to create a system based upon income bands.

Statutes and Regulations Waived: Certain provisions of sections 3(a)(1)-(2) of the 1937 Act and 24 CFR 5.628, 5.634(b) and 960.253.

1.b. Tiered Rent (HCV) – The agency may implement changes to the TTP calculation to create a system based upon income bands.

Statutes and Regulations Waived: Certain provisions of sections 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.628.

Safe Harbors: 1.a. and 1.b.

- i. Rents and/or TTP (as applicable) established under this system must be set using the lowest income in each band. For example, if an income band is \$2,500 - \$5,000 then the rent for that band must be set using \$2,500.*
- ii. The agency must adopt a flat rent and/or TTP (as applicable) policy within each income band instead of calculating rent based on adjusted or gross income.

Requested Waiver and Explanation

Tenant TTP/rent calculation is based on tiers, which are assigned using gross income, rather than adjusted income. * Rather than establishing TTP/rent at the lower end of a tier, as specified in 1.a./1.b. i., CKHA will establish TTP/rent at 28% of the midpoint for each tier. For recertifications, this income is calculated retroactively. The recertifications will occur triennially, rather than annually. Households do not report income increases between recertifications. Hardship policy is in place for households who face rent burden.

CKHA believes this total package of changes is necessary to achieve maximum staff efficiency and cost effectiveness under MTW flexibilities. The combination of changes encourages employment and self-sufficiency without significantly increasing overall costs for households. These simplifications make rent and utility calculations more understandable for families. The changes save time, and in many cases, lower costs. Simplified paperwork also benefits staff and landlords by determining household eligibility more quickly.

3. Reexaminations

The agency is authorized to implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations. The terms “low-income families” and “very low-income families” shall continue to be defined by reference to section 3(b)(2) of the 1937 Act. MTW agencies must continue to determine the initial eligibility of the family in accordance with provisions of 24 CFR 5.609.

3.a. Alternative Reexamination Schedule for Households (PH) – The agency may establish an alternative reexamination schedule for households.

Statutes and Regulations Waived: Certain provisions of sections 3(a)(1), 3(a)(2)(E) of the 1937 Act and 24 CFR 960.257(a)-(b).

3.b. Alternative Reexamination Schedule for Households (HCV) – The agency may establish an alternative reexamination schedule for households.

Statutes and Regulations Waived: Certain provisions of sections 8(o)(5) of the 1937 Act and 24 CFR 982.516(a)(1) and 982.516(c)(2).

Safe Harbors: 3.a. and 3.b.

- i. Reexaminations must occur at least every three years.
- ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.**
- iii. Agency must implement an impact analysis.
- iv. Agency must include a hardship policy.

Requested Waiver and Explanation

CKHA requests to change to reexamination every three years, with a release of information form that covers 40 months (rather than HUD-9886 that covers 15 months). **However, rather than an interim once per year if household has a decrease of gross income of 10% or more, if a household has a decrease in gross income that drops the family into a lower income tier, they would complete a hardship exception request. If approved, this exception would be in place for six months, at the end of which, rent would revert back to the established amount established at the previous triennial recertification. However, prior to the expiration of this exception, the household may complete a hardship exception request in order to continue the hardship or to request an alternative hardship. In order to achieve cost effectiveness, CKHA needs most households to move to a triennial schedule.

Allowing households to keep income gains until the next reexamination encourages employment and self-sufficiency and allows them to save for a rental deposit or homebuyer down payment, increasing housing choice. Families are protected from rent burden by the hardship policy.

See Impact Analysis and Hardship Policy attached.

1. Tenant Rent Policies

The agency is authorized to adopt and implement the activities listed below for setting tenant rents in public housing, including but not limited to establishing definitions of income and adjusted income that differ from those in the current 1937 Act and its implementing regulations. The agency is authorized to adopt and implement the activities listed below to establish total tenant payments (TTP)¹ in the HCV program, and/or tenant rents for tenant-based and project-based voucher (PBV) assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The agency is authorized to adopt and implement the activities listed below to calculate the tenant portion of the rent in a way that differs from the currently mandated program requirements in the 1937 Act and its implementing regulations. The agency must determine initial eligibility in accordance with 24 CFR 5.609 and must comply with section 3(b)(2) of the United States Housing Act of 1937 Act (1937 Act) (42 U.S.C. §1437). For voucher activities, the Department has developed a standard rider to the HAP contract that reflects any MTW authorizations that amend the current requirements of the HAP contract.

1.a.,1.b. Tiered Rent

| | | |
|---------------------------------|---|---|
| Activity | 1.a. Tiered Rent (PH) - The agency may implement changes to the tenant rent calculation to create a system based upon income bands. | 1.b. Tiered Rent (HCV) - The agency may implement changes to the TTP calculation to create a system based upon income bands. |
| Statutes and Regulations Waived | Tiered Rent (PH) - Certain provisions of sections 3(a)(1)-(2) of the 1937 Act and 24 CFR 5.628, 5.634(b) and 960.253. | Tiered Rent (HCV) - Certain provisions of sections 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.628. |
| Safe Harbors | 1.a. and 1.b. <ul style="list-style-type: none"> i. Rents and/or TTP (as applicable) established under this system must be set using the lowest income in each band. For example, if an income band is \$2,500-\$5,000 then the rent for that band must be set using \$2,500. ii. The agency must adopt a flat rent and/or TTP (as applicable) policy within each income band instead of calculating rent based on adjusted or gross income. | |

¹ In the HCV tenant-based program, the housing assistance payment (HAP) is the lower of: (1) the payment standard minus the family's TTP, or (2) the gross rent minus the TTP. The TTP is the minimum amount the family will pay as the family share. If the gross rent exceeds the payment standard, the family will pay TTP and the difference between the gross rent and the payment standard as the family share. In the HCV project-based program, the family always pays TTP minus any utility allowance (UA) as the tenant rent.

| 1i.,1.j. Alternative Utility Allowance | | |
|---|---|--|
| Activity | 1i. Alternative Utility Allowance (PH) - The agency may create a utility schedule(s) for all units. | 1j. Alternative Utility Allowance (HCV) - The agency may create a utility schedule(s) for all HCV units based upon bedroom size, the unit location and/or the types of utilities paid by participant. The agency may establish a site-based utility allowance in PBV. |
| Statutes and Regulations Waived | Alternative Utility Allowance (PH) - Certain provisions of 24 CFR. 965.503-506. | Alternative Utility Allowance (HCV) - Certain provisions of section 8(o)(2)(D)(i) of the 1937 Act and 24 CFR 982.517 and 983.301(f)(2)(ii). |
| Safe Harbor(s) | 1.i. and 1.j. i. The utility schedule must be based upon number of bedrooms, the property location, and/or the types of utilities paid by participant. ii. The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule. iii. The agency must not include items in the utility schedule that are excluded under HUD regulations. * | |
| 1.r.,1.s. Elimination of Deduction(s) | | |
| Activity | 1.r. Elimination of Deduction(s) (PH) - The agency may eliminate one, some, or all deductions. | 1.s. Elimination of Deduction(s) (HCV) - The agency may eliminate one, some, or all deductions. |
| Statutes and Regulations Waived | Elimination of Deduction(s) (PH) - Certain provisions of sections 3(a)(1), 3(b)(4)-(5) of the 1937 Act and 24 CFR 5.611, 960.253, 960.255, and 960.257. | Elimination of Deduction(s) (HCV) - Certain provisions of sections 3(a)(1), 3(b)(4)-(5) and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.611, and 982.516. |
| Safe Harbor(s) | 1.r. and 1.s. i. Agency must conduct an impact analysis. * ii. Agency must exempt elderly and disabled families from rent policy. * iii. Agency must implement a hardship policy. * | |
| 2. Payment Standards and Rent Reasonableness | | |
| <p>The agency is authorized to adopt and implement any reasonable policy to establish payment standards or rent reasonableness that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. For voucher activities, the Department has developed a standard rider to the HAP contract that reflects any MTW authorizations that amend the current requirements of the HAP contract.</p> | | |

| 2.d. Rent Reasonableness – Third-Party Requirement | | |
|--|--|---|
| Activity | 2.d. Rent Reasonableness – Third-Party Requirement (HCV) - The agency is authorized to perform rent reasonable determinations on PBV units that it owns, manages, and/or controls. | |
| Statutes and Regulations Waived | Rent Reasonableness – Third-Party Requirement (HCV) - Certain provisions of 24 CFR 982.352(b) and 983.303. | |
| Safe Harbor(s) | 2.d. i. The agency shall establish and make available a quality assurance method to ensure impartiality. * ii. The agency shall make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area. * iii. At the Department’s request, the agency must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units. * | |
| 3. Reexaminations | | |
| The agency is authorized to implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations. The terms “low-income families” and “very low-income families” shall continue to be defined by reference to section 3(b)(2) of the 1937 Act. MTW agencies must continue to determine the initial eligibility of the family in accordance with provisions of 24 CFR 5.609. | | |
| 3.a.,3.b. Alternative Reexamination Schedule for Households | | |
| Activity | 3.a. Alternative Reexamination Schedule for Households (PH) - The agency may establish an alternative reexamination schedule for households. | 3.b. Alternative Reexamination Schedule for Households (HCV) - The agency may establish an alternative reexamination schedule for households. |
| Statutes and Regulations Waived | Alternative Reexamination Schedule for Households (PH) - Certain provisions of sections 3(a)(1) and 3(a)(2)(E) of the 1937 Act and 24 CFR 960.257(a)-(b). | Alternative Reexamination Schedule for Households (HCV) - Certain provisions of section 8(o)(5) of the 1937 Act and 24 CFR 982.516 (a)(1) and 982.516(c)(2). |
| Safe Harbor(s) | 3.a. and 3.b. i. Reexaminations must occur at least every three years. ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. iii. Agency must implement an impact analysis. * iv. Agency must include a hardship policy. * | |
| 3.c.,3.d. Self-Certification of Assets | | |
| Activity | 3.c. Self-Certification of Assets (PH) - At reexamination, the agency may allow the self-certification of assets. | 3.d. Self-Certification of Assets (HCV) - At reexamination, the agency may allow the self-certification of assets. |

| | | |
|--|--|---|
| Statutes and Regulations Waived | Self-Certification of Assets (PH) - Certain provisions of sections 3(a)(1) and 3(a)(2)(E) of the 1937 Act and 24 CFR. 960.259(c)(2). | Self-Certification of Assets (HCV) - Certain provisions of section 8(o)(5) of the 1937 Act and 24 CFR. 982.516 (a)(3). |
| Safe Harbor(s) | 3.c. and 3.d. i. At reexamination, the agency may allow the self-certification of assets only up to \$50,000. | |
| 5. Housing Quality Standards (HQS) | | |
| Subject to state and local laws, the agency is authorized by the Secretary to develop flexibilities around an HQS inspection's timing and frequency, the independent-entity requirement, and penalties for failing an HQS inspection, as detailed below. Implementation of any of the below discrete HQS activities meets the requirements of the 1996 MTW Statute, which requires housing to meet HQS established or approved by the Secretary. | | |
| 5.c. Third-Party Requirement | | |
| Activity | 5.c. Third-Party Requirement (HCV) - The agency is authorized to perform HQS inspections on PBV units that it owns, manages, and/or controls. | |
| Statutes and Regulations Waived | Third-Party Requirement (HCV) - Certain provisions of section 8(o)(11) of the 1937 Act, 24 CFR 982.352(b)(iv) and 24 CFR 983.103(f). | |
| Safe Harbor(s) | 5.c. i. The agency shall establish and make available a quality assurance method to ensure an objective analysis. * ii. The participant must be able to request an interim inspection. * iii. HQS inspection standards must not be altered as found at 24 CFR 982.401. * iv. At the Department's request, the agency must obtain the services of a third-party entity to determine if PHA-owned units pass HQS. * | |
| 9. Project-Based Voucher Program Flexibilities | | |
| The agency is authorized to adopt and implement the activities listed below in the project-based voucher program. For voucher activities, the Department has developed a standard rider to the HAP contract that reflects any MTW authorizations that amend the current requirements of the HAP contract. | | |
| 9.b. Increase PBV Project Cap | | |
| Activity | 9.b. Increase PBV Project Cap (HCV) - The agency may raise the PBV cap within a project up to 100%. | |
| Statutes and Regulations Waived | Increase PBV Project Cap (HCV) - Certain provisions of section 8(o)(13)(D) of the 1937 Act and 24 CFR 983.56(a)-(b), as superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461 (see implementation guidance in Notice PIH 2017-21). | |
| Safe Harbor(s) | 9.b. i. The agency is subject to Notice PIH 2013-27 where applicable, or successor. * | |



RENT REASONABLENESS QUALITY & IMPARTIALITY POLICY

A. Purpose

1. Introduction and purpose of the policy

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

2. Scope

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

3. Distribution

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

4. Authority and revision

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

B. Procedure

1. Activity

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

2. Safe Harbors

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

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

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



RENT REASONABLENESS QUALITY & IMPARTIALITY POLICY

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

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

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

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

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

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

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



RENT REASONABLENESS QUALITY & IMPARTIALITY POLICY

I. Step-by Step Explanation of Procedures

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

Preparation: Use of Location

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

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

Preparation: Assigning Maximum Value Points to HUD Required Characteristics

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

Value Point Levels Applied to Each Characteristic

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

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

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



RENT REASONABLENESS QUALITY & IMPARTIALITY POLICY

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

3. Internal QC

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



HQS THIRD-PARTY REQUIREMENT QUALITY & IMPARTIALITY POLICY

A. Purpose

1. Introduction and purpose of the policy

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

2. Scope

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

3. Distribution

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

4. Authority and revision

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

B. Procedure

1. Activity

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

2. Safe Harbors

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



HQS THIRD-PARTY REQUIREMENT QUALITY & IMPARTIALITY POLICY

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

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

CKHA MTW Meeting Notes & Feedback

Tuesday, October 19, 2021 – MTW Information Session In-person (Hillcrest Property)

4 participants 11:00 – 11:30 am

Welcome & Introduction of CKHA staff

Jeff Knight, COO

Tammy Edelman, Director of Housing Management

Moving to Work (MTW) Coordinator – TBD

MTW explanation (including Tiered Rent), background and planned start date of July 1, 2022

Discussion of which households will not be eligible to participate

Discussed statutory objectives of cost effectiveness, self-sufficiency and housing choice.

Discussed program goals of simplifying CKHA's administrative burden, creating a stronger financial incentive for families to increase their income, continuing to provide a safety net for families that cannot readily increase their income and minimizing increases in CKHA's average housing subsidy expenditures per family.

Discussed Hardship policy and availability to request one, if needed.

Reviewed anticipated waivers to be requested for MTW Demonstration.

Provided handout with summary and agency contact information.

Tuesday, October 19, 2021 – MTW Information Session In-person (Oakhurst Property)

5 participants 1:30 – 2:00 pm

Welcome & Introduction of CKHA staff

Jeff Knight, COO

Tammy Edelman, Director of Housing Management

Moving to Work (MTW) Coordinator – TBD

MTW explanation (including Tiered Rent), background and planned start date of July 1, 2022

Discussion of which households will not be eligible to participate

Discussed statutory objectives of cost effectiveness, self-sufficiency and housing choice.

Discussed program goals of simplifying CKHA's administrative burden, creating a stronger financial incentive for families to increase their income, continuing to provide a safety net for families that cannot

readily increase their income and minimizing increases in CKHA's average housing subsidy expenditures per family.

Discussed Hardship policy and availability to request one, if needed.

Reviewed anticipated waivers to be requested for MTW Demonstration.

Provided handout with summary and agency contact information.

Wednesday, October 20, 2021 – MTW Information Session In-person (Orchard Manor Property)

10 participants 11:00 – 11:30 am

Welcome & Introduction of CKHA staff

Jeff Knight, COO

Tammy Edelman, Director of Housing Management

Moving to Work (MTW) Coordinator – TBD

MTW explanation (including Tiered Rent), background and planned start date of July 1, 2022

Discussion of which households will not be eligible to participate

Discussed statutory objectives of cost effectiveness, self-sufficiency and housing choice.

Discussed program goals of simplifying CKHA's administrative burden, creating a stronger financial incentive for families to increase their income, continuing to provide a safety net for families that cannot readily increase their income and minimizing increases in CKHA's average housing subsidy expenditures per family.

Discussed Hardship policy and availability to request one, if needed.

Reviewed anticipated waivers to be requested for MTW Demonstration.

Provided handout with summary and agency contact information.

Wednesday, October 20, 2021 – MTW Information Session In-person (Littlepage Property)

4 participants 1:30 – 2:00 pm

Welcome & Introduction of CKHA staff

Jeff Knight, COO

Tammy Edelman, Director of Housing Management

Moving to Work (MTW) Coordinator – TBD

MTW explanation (including Tiered Rent), background and planned start date of July 1, 2022

Discussion of which households will not be eligible to participate

Discussed statutory objectives of cost effectiveness, self-sufficiency and housing choice.

Discussed program goals of simplifying CKHA's administrative burden, creating a stronger financial incentive for families to increase their income, continuing to provide a safety net for families that cannot readily increase their income and minimizing increases in CKHA's average housing subsidy expenditures per family.

Discussed Hardship policy and availability to request one, if needed.

Reviewed anticipated waivers to be requested for MTW Demonstration.

Provided handout with summary and agency contact information.

Thursday, October 21, 2021 – MTW Information Session In-person (Rand Property)

4 participants 11:00 – 11:30 am

Welcome & Introduction of CKHA staff

Jeff Knight, COO

Tammy Edelman, Director of Housing Management

Moving to Work (MTW) Coordinator – TBD

MTW explanation (including Tiered Rent), background and planned start date of July 1, 2022

Discussion of which households will not be eligible to participate

Discussed statutory objectives of cost effectiveness, self-sufficiency and housing choice.

Discussed program goals of simplifying CKHA's administrative burden, creating a stronger financial incentive for families to increase their income, continuing to provide a safety net for families that cannot readily increase their income and minimizing increases in CKHA's average housing subsidy expenditures per family.

Discussed Hardship policy and availability to request one, if needed.

Reviewed anticipated waivers to be requested for MTW Demonstration.

Provided handout with summary and agency contact information.

Thursday, October 21, 2021 – MTW Information Session In-person (Dunbar Property)

4 participants 1:30 – 2:00 pm

Welcome & Introduction of CKHA staff

Jeff Knight, COO

Tammy Edelman, Director of Housing Management

Moving to Work (MTW) Coordinator – TBD

MTW explanation (including Tiered Rent), background and planned start date of July 1, 2022

Discussion of which households will not be eligible to participate

Discussed statutory objectives of cost effectiveness, self-sufficiency and housing choice.

Discussed program goals of simplifying CKHA's administrative burden, creating a stronger financial incentive for families to increase their income, continuing to provide a safety net for families that cannot readily increase their income and minimizing increases in CKHA's average housing subsidy expenditures per family.

Discussed Hardship policy and availability to request one, if needed.

Reviewed anticipated waivers to be requested for MTW Demonstration.

Provided handout with summary and agency contact information.

Wednesday, October 27, 2021 – MTW Information Session In-person (Washington Manor Property)

8 participants 11:00 – 11:30 am

Welcome & Introduction of CKHA staff

Jeff Knight, COO

Tammy Edelman, Director of Housing Management

Moving to Work (MTW) Coordinator – TBD

MTW explanation (including Tiered Rent), background and planned start date of July 1, 2022

Discussion of which households will not be eligible to participate

Discussed statutory objectives of cost effectiveness, self-sufficiency and housing choice.

Discussed program goals of simplifying CKHA's administrative burden, creating a stronger financial incentive for families to increase their income, continuing to provide a safety net for families that cannot readily increase their income and minimizing increases in CKHA's average housing subsidy expenditures per family.

Discussed Hardship policy and availability to request one, if needed.

Reviewed anticipated waivers to be requested for MTW Demonstration.

Provided handout with summary and agency contact information.

Wednesday, October 27, 2021 – MTW Information Session In-person (South Park Property)

8 participants 1:30 – 2:00 pm

Welcome & Introduction of CKHA staff

Jeff Knight, COO

Tammy Edelman, Director of Housing Management

Moving to Work (MTW) Coordinator – TBD

MTW explanation (including Tiered Rent), background and planned start date of July 1, 2022

Discussion of which households will not be eligible to participate

Discussed statutory objectives of cost effectiveness, self-sufficiency and housing choice.

Discussed program goals of simplifying CKHA's administrative burden, creating a stronger financial incentive for families to increase their income, continuing to provide a safety net for families that cannot readily increase their income and minimizing increases in CKHA's average housing subsidy expenditures per family.

Discussed Hardship policy and availability to request one, if needed.

Reviewed anticipated waivers to be requested for MTW Demonstration.

Provided handout with summary and agency contact information.

Tuesday, November 30, 2021 – Virtual via Microsoft Teams

8 participants 1:00 – 1:45 pm

Welcome & Introduction of CKHA staff

Jeff Knight, COO

Carmen Maniak, Director of Leased Housing

Tammy Edelman, Director of Housing Management

Serena Seen, Moving to Work (MTW) Coordinator

Power Point Overview of MTW Demonstration

MTW explanation, background and selection process

CKHA application, selection and planned start date of July 1, 2022

Discussion of which households will not be eligible to participate

MTW Cohort #2 explanation- rent reform (Tiered Rent)

Discussion of control group vs. randomly assigned group (by outside agency, not CKHA)

Review of Tiered Rent Structure- with gross income (retrospective for recertifications) determining tier, thus rental payment/TTP. Each tier is range accounting for \$2,499 and the midpoint of each range is 28% of gross income. There are 31 tiers, but only 5 on the example listed on screen.

Discussed statutory objectives of cost effectiveness, self-sufficiency and housing choice.

Discussed program goals of simplifying CKHA's administrative burden, creating a stronger financial incentive for families to increase their income, continuing to provide a safety net for families that cannot readily increase their income and minimizing increases in CKHA's average housing subsidy expenditures per family.

Discussed Hardship policy and availability to request one, if needed.

Reviewed requested waivers for MTW Demonstration

C.1.a/b Rent calculation at each tier using midpoint (28%)

C.1. i/j Establish alternative utility allowance based on the most common structure type, number of bedrooms and base payment on the most common utilities

C.1 r/s Eliminate deductions and use gross income to calculate rent

C.2d CKHA is authorized to perform rent reasonableness determinations on units that it owns, manages and/or controls

C.3.a/b Establish alternative (triennial) reexamination schedule (allow for adjusting via hardship policy if gross income drops into lower tier)

C.3.c/d Allow for self-certification of assets up to \$50,000

C.5c CKHA is authorized to perform HQS inspections on PBV units that it owns, manages and/or controls

C.9.b CKHA may raise the PBV cap within a project up to 100%

Agency-Specific Waiver- Modification to the Income Verification Hierarchy (Notice PIH 2018-18) to streamline the process for recertifications to EIV < Self-Certification

Reviewed expected timeline of enrollment and MTW Demonstration Study.

Questions/Comments

? Is rent based on monthly or annual income? Annual gross income- retroactive for previous year for recertifications.

? How will tiered rent help people to get on their feet? Discussed the goal of participants being able to save or use their extra money toward self-sufficiency purposes rather than paying additional rent when income increases.

? What if rent goes up to the point where can't afford it and will lose their home? Discussed hardship policy, including eviction prevention.

? What about large families that rely on dependent deduction? Reiterated that could be discussed as a hardship request.

Comments

Don't know much about process, just fill out paperwork.

Want to buy a house, but need more income. Husband is trying to get another job.

Child care issues with adoptive children.

? What is the process to get HUD to reconsider utility payments? (Behind on utilities.) Addressed service coordinators and options for assistance.

? Can you send me homeownership paperwork? (request from multiple participants) CKHA will be having a homeownership class with more information, likely in January.

Wednesday, December 1, 2021 – In-person Meeting at CKHA Office

15 participants 11:00 am – 12:00 pm

Welcome & Introduction of CKHA staff

Jeff Knight, COO

Carmen Maniak, Director of Leased Housing

Tammy Edelman, Director of Housing Management

Serena Seen, Moving to Work (MTW) Coordinator

Power Point Overview of MTW Demonstration

MTW explanation, background and selection process

CKHA application, selection and planned start date of July 1, 2022

Discussion of which households will not be eligible to participate

MTW Cohort #2 explanation- rent reform (Tiered Rent)

Discussion of control group vs. randomly assigned group (by outside agency, not CKHA)

Review of Tiered Rent Structure- with gross income (retrospective for recertifications) determining tier, thus rental payment/TTP. Each tier is range accounting for \$2,499 and the midpoint of each range is 28% of gross income. There are 31 tiers, but only 5 on the example listed on screen.

Discussed statutory objectives of cost effectiveness, self-sufficiency and housing choice.

Discussed program goals of simplifying CKHA's administrative burden, creating a stronger financial incentive for families to increase their income, continuing to provide a safety net for

families that cannot readily increase their income and minimizing increases in CKHA's average housing subsidy expenditures per family.

Discussed Hardship policy and availability to request one, if needed.

Reviewed requested waivers for MTW Demonstration

C.1.a/b Rent calculation at each tier using midpoint (28%)

C.1. i/j Establish alternative utility allowance based on the most common structure type, number of bedrooms and base payment on the most common utilities

C.1 r/s Eliminate deductions and use gross income to calculate rent

C.2d CKHA is authorized to perform rent reasonableness determinations on units that it owns, manages and/or controls

C.3.a/b Establish alternative (triennial) reexamination schedule (allow for adjusting via hardship policy if gross income drops into lower tier)

C.3.c/d Allow for self-certification of assets up to \$50,000

C.5c CKHA is authorized to perform HQS inspections on PBV units that is owns, manages and/or controls

C.9.b CKHA may raise the PBV cap within a project up to 100%

Agency-Specific Waiver- Modification to the Income Verification Hierarchy (Notice PIH 2018-18) to streamline the process for recertifications to EIV < Self-Certification

Reviewed expected timeline of enrollment and MTW Demonstration Study.

Questions/Comments

? Do you have to be 18 to participate? Discussed that MTW is determined via Head of Household status and that you would have to be 18 to be HOH.

? How does this affect amount of rent that is paid? Tiered rent lets you know how much rent will be based on annual income from the past year and will stay consistent until the triennial recertification. There will be no surprises, but there will be a hardship policy if something were to significantly decrease income.

? How do we determine the affordability of the unit? Based on payment standards.

? Do I have to get a job now? Discussed no one will be forced to obtain employment. Residents will be encouraged and supported as needed for employment and education related resources.

? Will I have to move? No one will be required to move from their home.

Comments

I make more than this chart. – Reiterated that the chart in the power point is just a sample of the full tiered rent explanation chart.

? I want to know more about homeownership? (request from multiple participants) CKHA will be having a homeownership class with more information, likely in January.

Thursday, December 2, 2021 – Virtual via Microsoft Teams

14 attendees 11:00 – 11:50 am

Welcome & Introduction of CKHA staff

Jeff Knight, COO

Carmen Maniak, Director of Leased Housing

Tammy Edelman, Director of Housing Management

Serena Seen, Moving to Work (MTW) Coordinator

Power Point Overview of MTW Demonstration

MTW explanation, background and selection process

CKHA application, selection and planned start date of July 1, 2022

Discussion of which households will not be eligible to participate

MTW Cohort #2 explanation- rent reform (Tiered Rent)

Discussion of control group vs. randomly assigned group (by outside agency, not CKHA)

Review of Tiered Rent Structure- with gross income (retrospective for recertifications) determining tier, thus rental payment/TTP. Each tier is range accounting for \$2,499 and the midpoint of each range is 28% of gross income. There are 31 tiers, but only 5 on the example listed on screen.

Discussed statutory objectives of cost effectiveness, self-sufficiency and housing choice.

Discussed program goals of simplifying CKHA's administrative burden, creating a stronger financial incentive for families to increase their income, continuing to provide a safety net for families that cannot readily increase their income and minimizing increases in CKHA's average housing subsidy expenditures per family.

Discussed Hardship policy and availability to request one, if needed.

Reviewed requested waivers for MTW Demonstration

C.1.a/b Rent calculation at each tier using midpoint (28%)

C.1. i/j Establish alternative utility allowance based on the most common structure type, number of bedrooms and base payment on the most common utilities

C.1 r/s Eliminate deductions and use gross income to calculate rent

C.2d CKHA is authorized to perform rent reasonableness determinations on units that it owns, manages and/or controls

C.3.a/b Establish alternative (triennial) reexamination schedule (allow for adjusting via hardship policy if gross income drops into lower tier)

C.3.c/d Allow for self-certification of assets up to \$50,000

C.5c CKHA is authorized to perform HQS inspections on PBV units that it owns, manages and/or controls

C.9.b CKHA may raise the PBV cap within a project up to 100%

Agency-Specific Waiver- Modification to the Income Verification Hierarchy (Notice PIH 2018-18) to streamline the process for recertifications to EIV < Self-Certification

Reviewed expected timeline of enrollment and MTW Demonstration Study.

Questions/Comments

? How will this program affect me with health issues? Addressed that if someone receives disability or has applied, they will not be eligible for MTW Demonstration.

? How will this impact those who pay flat rent in PH? Discussed those households that pay flat rent will not be eligible for the MTW Demonstration.

Comments

My client is a resident and I am his caregiver. He cannot work. – Reviewed guidelines again about who qualifies for MTW Demonstration.

I want to be a part of this.

I need help getting a job

Discussed client services department and resources available.

CKHA Agency Analysis of MTW Public Meeting Notes & Feedback

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

Feedback was positive overall, with several residents indicating it seemed like a good program.

The most frequent comments were related to getting help finding a job and/or information about homeownership. It was determined that a quarterly newsletter distributed to CKHA residents would be helpful in informing and reminding them that there is a Family Self-Sufficiency Program and Service Coordinators within the CKHA Client Services Department to help obtain resources.

Some concerns regarding child care and dependent deductions were expressed. It was determined that the hardship policy would specifically specify examples, including these. Additionally, specification would be included within the hardship policy regarding application for and/or loss of benefits.

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 04/01/2022, hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA 's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(0)(3) and 903.1S(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(0) 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(0)(1)-(3) and 903.1S(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 SO 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 MTWPHA will comply with the policies, guidelines, and requirements of 24 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, 1011; 31 U.S.C 3729, 3801).

Allan L. McVey

Chair of Board of Commissioners

NAME OF AUTHORIZED OFFICIAL

TITLE


SIGNATURE

12/10/2021
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.*