

# PHA Name : Concord Housing Authority

**PHA Code :** NH005

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 10/1/2023

**PHA Program Type:** Combined

**MTW Cohort Number:** Asset Building

**MTW Supplement Submission Type:** Annual Submission

## **B. MTW Supplement Narrative.**

Concord Housing and Redevelopment (CH+R) is pleased to have been awarded by HUD to participate in the Moving to Work (MTW) Demonstration Program's Asset Building Cohort. Through the funding flexibility and regulatory relief provided by the MTW program, CH+R will design and test innovative strategies to increase housing choice and self-sufficiency, streamline programming, and administer more efficient and transparent programs that are responsive to community needs and priorities. CH+R envisions utilizing the flexibilities offered under the MTW program to improve the programs and services available to clients, increase and expand available housing opportunities, and facilitate new partnerships to leverage additional resources needed to address the affordable housing crisis in the region.

CH+R's overall mission, which is to "advocate, develop, operate, and manage affordable housing programs to provide decent, safe, and affordable housing for families in a manner that promotes and improves the economic independence and social well-being of its residents," aligns well with the three MTW statutory objectives. To fulfill this mission, CH+R provides a variety of programs and services designed to: (1) act as a catalyst and community partner in developing new affordable housing opportunities, (2) engage in community wide revitalization initiatives in a manner that improves the City's neighborhoods, promotes economic development, and increases employment opportunities for all citizens; (3) provide personal and economic enrichment opportunities for all constituents; and (4) help residents achieve independence through supportive services and training.

CH+R welcomes the opportunity to participate in Cohort #4 of the MTW Expansion, which is focused on asset building initiatives, defined as activities that encourage the growth of savings accounts and/or aim to build credit for assisted households. The asset building component of this initiative assists and incentivizes program participants to improve their credit scores, budget and save, establish, and achieve financial goals, and build generational wealth and opportunity. The lessons learned from this MTW cohort will be critical in shaping future policy around asset building, financial literacy, and other economic self-sufficiency initiatives. Further, CH+R appreciates the opportunity to connect with other innovative MTW agencies by participating in the "Community of Practice" sessions for MTW Asset Building Cohort to share ideas and best practices. Upon designation as an MTW agency, CH+R intends to utilize MTW programmatic and funding flexibilities to achieve other objectives, including streamlining program administration and increasing housing choice, as authorized in the MTW Operations Notice and through the MTW Plan/Supplement process.

**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).**

<b>1. Tenant Rent Policies</b>	
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Plan to Implement in the Submission Year
c. Rent Reasonableness – Process (HCV)	Plan to Implement in the Submission Year
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
<b>3. Reexaminations</b>	
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
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
<b>6. Short-Term Assistance</b>	
<b>7. Term-Limited Assistance</b>	
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
d. Alternative PBV Selection Process (HCV)	Plan to Implement in the Submission Year
f. Increase PBV HAP Contract Length (HCV)	Plan to Implement in the Submission Year
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
<b>11. MTW Self-Sufficiency Program</b>	
<b>12. Work Requirement</b>	
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	
c. Housing Development Programs	Plan to Implement in the Submission Year

**C. MTW Activities Plan that Concord Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing**

<b>2.a. - Payment Standards- Small Area Fair Market Rents (HCV)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b>
This activity will allow CH+R to adopt and implement a reasonable policy to establish payment standards based upon applicable Small Area Fair Market Rents (SAFMRs). CH+R may use this flexibility to establish payment standards for grouped ZIP code areas between 80% and 120% of the applicable SAFMRs, based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc., or may establish payment standards for each ZIP code within its jurisdiction. Among the geographic considerations in grouping SAFMRs, CH+R may explore the use of school

districts.

**Agency Goals for the MTW Activity:**

CH+R's goal is to utilize a comprehensive approach to expand housing opportunities for HCV participants and to increase landlord participation in the HCV Program. Ultimately, the CH+R will provide HCV participants with information about housing opportunity areas and bargains. This will be done through SAFMRs and the provision/access to information to families with neighborhood data and information to exercise their choices about where to live. CH+R will increase housing choices for HCV participants to live in areas of opportunity based on Payment Standards between 80% and 150% of the SAFMRs. Through the measures above, CH+R plans to increase housing choice and opportunities and deconcentrating poverty for HCV participants in neighborhoods that have access to jobs, good schools, healthcare, a healthy environment, healthy foods, safe neighborhoods, and transportation services.

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

Self-sufficiency; Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

**Does this MTW activity require a hardship policy?**

Yes

This document is attached.

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

No

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

No

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

No hardship were requested in the most recent fiscal year.

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

No

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

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

No

**Please explain the payment standards by ZIP code or "grouped" ZIP codes:**

Grouped ZIP codes based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc.,

Through this activity, CH+R plans to increase housing choice and opportunities and deconcentrating poverty for HCV participants in neighborhoods that have access to jobs, good schools, healthcare, a healthy environment, healthy foods, safe neighborhoods, and transportation services.

Among the geographic considerations in grouping SAFMRs, CH+R may explore the use of school districts.

### 2.c. - Rent Reasonableness – Process (HCV)

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

CH+R will use MTW flexibility to perform rent reasonable determinations of units that it owns, manages, and/or controls. CH+R will make reasonable rent determinations with the support of third-party software that taps into a National database.

This process will ensure fair and valid determinations.

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

Cost effectiveness

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

No

**Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method.**

The agency will determine rent reasonableness with the support of third-party software. CH+R will consider information for each type of unit, including location, quality, size, type, age of unit, amenities, maintenance, and utilities to be provided by the owner.

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

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

CH+R will use MTW flexibility to perform rent reasonable determinations on units that it owns, manages, and/or controls. CH+R will make reasonable rent determinations with the support of third-party software that taps into a national database. This process will ensure fair and valid determinations.

Agency goals for MTW Activity:

Increase rent reasonable turn window to support on-time reporting. This waiver supports CH+R's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.

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

Cost effectiveness

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

No

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

Reasonable rent determinations will be made with the support of a third-party database that is updated annually based on market conditions.

No document is attached.

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

The agency will determine rent reasonableness with the support of third-party software. CH+R will consider information for each type of unit, including location, quality, size, type, age of unit, amenities, maintenance, and utilities to be provided by the owner.

No document is attached.

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

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

Description:

CH+R may implement a triennial reexamination schedule for some elderly and disabled households. If a household meets the following three criteria, it will be enrolled in triennial reexaminations.

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations.

For these households, the standard rent calculation method will be used and households will continue to receive the elderly/disabled allowance and be eligible to claim unreimbursed medical expenses, if applicable (see standardized medical deduction waiver). If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's contract rent is above their payment standard. The households may continue to request interim reexaminations due to a decrease in income. There will be a limit of one interim reexaminations allowed to be requested per year. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

CH+R must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10 percent or more. CH+R must conduct an interim reexamination of family income when it becomes aware that the family's adjusted income has changed by an amount that it estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except CH+R may not consider any increase in income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction at their request because of any changes in income since the last examination during the certification period; and CH+R may choose not to conduct an interim reexamination in the last three months of a certification period. In other words, CH+Rs may not consider a family's increases in income for the purposes of an interim reexamination unless the family had previously undergone an interim reexamination during the year for any decrease in income. If the family has undergone an interim reexamination for a decrease in income after the completion of the last reexamination, CH+R also has discretion regarding whether or not to count increases in income when estimating or calculating whether the family's adjusted income has increased.

Triennial reexaminations for these households are expected to begin with reexaminations effective in 2024. When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

This schedule will also include only reviewing the EIV at the triennial recertification rather than annually, implementing a release form that is valid for 45 months, and updating the payment standard and utility allowance at the time of a rent increase for the affected households. In addition, households on a triennial recertification schedule will not utilize the IVT Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase administrative burden of PHA staff. Unreported income requires no change or rent correction for triennial households unless it occurs before their last reexamination, so the IVT Report will not provide any needed information that cannot be gathered from the EIV. PHA staff will continue to monitor the EIV at households' triennial reexaminations to ensure the proper reporting of income.

Agency goals for MTW Activity:

This activity will help CH+R further its goals to increase cost effectiveness. This activity will reduce administrative costs and burdens by reducing the amount of recertification paperwork and staff time, every three years. Households with income increases (beyond Cost-of-Living Adjustments for fixed-income households) will also be able to retain more of their income without it being calculated towards their rent share and tenant-paid utility allowance, to provide them with more income for their ongoing living expenses. This activity will contribute to a reduction in CH+R staff time spent on the certification process for participants through triennial recertifications, standardizing medical and disability expense deductions, and utilizing local methods for verification processes.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

**Does this MTW activity require a hardship policy?**

Yes

This document is attached.

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

No

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

No

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

No hardship were requested in the most recent fiscal year.

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

No

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

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

No

**What is the recertification schedule?**

Once every three years

**How many interim recertifications per year may a household request?**

1

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

Family circumstances may change throughout the period between annual reexaminations. HUD and CH+R policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the CH+R must process interim reexaminations to reflect those changes. HUD regulations also permit the CH+R to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted [HCV GB, p. 12-10]. In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition changes. The CH+R must complete the interim reexamination within a reasonable time after the family's request.

If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's contract rent is above their payment standard. The households may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement

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

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

Description:

CH+R may implement a triennial reexamination schedule for some elderly and disabled households. If a household meets the following three criteria, it will be enrolled in triennial reexaminations.

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations.

For these households, the standard rent calculation method will be used and households will continue to receive the elderly/disabled allowance and be eligible to claim unreimbursed medical expenses, if applicable (see standardized medical deduction waiver). If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's contract rent is above their payment standard. The households may continue to request interim reexaminations due to a decrease in income. There will be a limit of one interim reexaminations allowed to be requested per year. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

CH+R must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10 percent or more. CH+R must conduct an interim reexamination of family income when it becomes aware that the family's adjusted income has changed by an amount that it estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except CH+R may

not consider any increase in income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction at their request because of any changes in income since the last examination during the certification period; and CH+R may choose not to conduct an interim reexamination in the last three months of a certification period. In other words, CH+Rs may not consider a family's increases in income for the purposes of an interim reexamination unless the family had previously undergone an interim reexamination during the year for any decrease in income. If the family has undergone an interim reexamination for a decrease in income after the completion of the last reexamination, CH+R also has discretion regarding whether or not to count increases in income when estimating or calculating whether the family's adjusted income has increased.

Triennial reexaminations for these households are expected to begin with reexaminations effective in 2024. When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

This schedule will also include only reviewing the EIV at the triennial recertification rather than annually, implementing a release form that is valid for 45 months, and updating the payment standard and utility allowance at the time of a rent increase for the affected households. In addition, households on a triennial recertification schedule will not utilize the IVT Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase administrative burden of PHA staff. Unreported income requires no change or rent correction for triennial households unless it occurs before their last reexamination, so the IVT Report will not provide any needed information that cannot be gathered from the EIV. PHA staff will continue to monitor the EIV at households' triennial reexaminations to ensure the proper reporting of income.

Agency goals for MTW Activity:

This activity will help CH+R further its goals to increase cost effectiveness. This activity will reduce administrative costs and burdens by reducing the amount of recertification paperwork and staff time, every three years. Households with income increases (beyond Cost-of-Living Adjustments for fixed-income households) will also be able to retain more of their income without it being calculated towards their rent share and tenant-paid utility allowance, to provide them with more income for their ongoing living expenses. This activity will contribute to a reduction in CH+R staff time spent on the certification process for participants through triennial recertifications, standardizing medical and disability expense deductions, and utilizing local methods for verification processes.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

**Does this MTW activity require a hardship policy?**

Yes

This document is attached.

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

No

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

No

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

No hardship were requested in the most recent fiscal year.

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

No

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

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

No

**What is the recertification schedule?**

Once every three years

**How many interim recertifications per year may a household request?**

1

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

Family circumstances may change throughout the period between annual reexaminations. HUD and CH+R policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the CH+R must process interim reexaminations to reflect those changes. HUD regulations also permit the CH+R to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted [HCV GB, p. 12-10]. In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition changes. The CH+R must complete the interim reexamination within a reasonable time after the family's request.

If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's contract rent is above their payment standard. The households may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

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

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

CH+R will allow participants and applicants (through a safe harbor waiver) to self-certify their assets up to \$50,000.

Agency goals for MTW Activity:

Decrease administrative time and costs required to follow up and secure documents, allowing staff to focus on other priorities. This may also lower barriers to participants in obtaining asset verification. This waiver may improve cost effectiveness in our effort to reduce administrative burden while still maintaining the integrity of the rent calculation process. Staff spend substantial amounts of administrative time verifying assets that do not impact participants' rent portions. Participants know the approximate balances in their accounts and rarely receive interest payments. By allowing them to self-certify, CH+R will free up staff time to accomplish other tasks and require less burdensome documentation of participants.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

No

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

\$50,000.

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

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

CH+R will allow participants and applicants (through a safe harbor waiver) to self-certify their assets up to \$50,000.

Agency goals for MTW Activity:

Decrease administrative time and costs required to follow up and secure documents, allowing staff to focus on other priorities. This may also and lower barriers to participants in obtaining asset verification. This waiver may improve cost effectiveness in our effort to reduce administrative burden while still maintaining the integrity of the rent calculation process. Staff spend substantial amounts of administrative time verifying assets that do not impact participants' rent portions. Participants know the approximate balances in their accounts and rarely receive interest payments. By allowing them to self-certify, CH+R will free up staff time to accomplish other tasks and require less burdensome documentation of participants.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

No

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

\$50,000.

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

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

CH+R may offer vacancy loss payments to landlords in its service area that re-lease a unit to a voucher holder after a previous voucher holder has vacated the unit. The payment amount will be no more than one month's contract rent of the previous tenant. The landlord must re-lease the unit to a new voucher holder within 3 months of the CH+R recorded move-out date of the previous tenant and will be paid when the new HAP contract is executed between the owner and CH+R.

Agency goals for MTW Activity:

The goal of this activity is to incentivize landlords to continue their participation in the HCV program and to maintain the availability of units in zip codes of opportunity. The vacancy loss payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The vacancy loss payments will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and also encourage landlords to seek out additional voucher tenants rather than relying on the open market, thereby maintaining housing in zip codes of opportunity.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

No

**Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)**

To all units

**What is the maximum payment that can be made to a landlord under this policy?**

The payment amount will be no more than one month's contract rent of the previous tenant.

**How many payments were issued under this policy in the most recently completed PHA fiscal year?**

0

**What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?**

\$0

**4.b. - Damage Claims (HCV-Tenant-based Assistance)**

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

CH+R is considering the offer of a limited damage claim not to exceed one month's contract rent to owner in cases where an MTW tenant-based voucher participant's tenancy ends and there is tenant-caused damage to the unit that exceeds the security deposit collected by the owner. The damage claim would be verified by a special inspection conducted by a CH+R HQS inspector. The special inspection will be required to be conducted within 30 calendar days of the MTW tenant-based HCV participant's move-out date. The landlord must re-lease the unit to a new voucher holder within 3 months of the

CH+R recorded move-out date of the previous tenant and will be paid when the new HAP contract is executed between the owner and CH+R.

Agency goals for MTW Activity:

The goal of this activity is to incentivize landlords to continue their participation in the HCV program. The limited damage claim payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The limited damage claim payments will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and also encourage landlords to seek out additional voucher tenants rather than relying on the open market.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

No

**Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)**

To all units

**What is the maximum payment that can be made to a landlord under this policy?**

CH+R is considering the offer of a limited damage claim not to exceed one month's contract rent to owner in cases where an MTW tenant-based voucher participant's tenancy ends and there is tenant-caused damage to the unit that exceeds the security deposit collected by the owner.

**How many payments were issued under this policy in the most recently completed PHA fiscal year?**

0

**What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?**

\$0

#### **4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)**

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

CH+R is considering the offer a one-time incentive HAP payment of \$1,000.00 to new landlords, upon the execution of a new HAP contract for an MTW tenant-based HCV participant.

Landlords would be eligible for this payment yearly, based on a new contract with a new tenant. A "new landlord" would be defined as a landlord who has not rented to a tenant-based voucher participant within the past twelve (12) months. The landlord would not be eligible for the \$1,000.00 incentive HAP payment if the contract is executed for a transfer of units with the same landlord, or if the contract is executed due to a lease renewal or change. Additionally, properties owned or managed by CH+R would be ineligible for this incentive.

Agency goals for MTW Activity:

The goal of this activity is to incentivize landlords to continue their participation in the HCV program. The New Landlord Incentive payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The New Landlord Incentive will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and also encourage landlords to seek out additional voucher tenants rather than relying on the open market.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

No

**Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)**

To all units

**What is the maximum payment that can be made to a landlord under this policy?**

CH+R is considering the offer of a one-time \$500.00 incentive HAP payment to existing landlords who execute a new HAP contract for an MTW tenant-based HCV participant. An "existing landlord" would be defined as a landlord who has rented to a tenant-based voucher participant at any time within the past twelve (12) months. The landlord would not be eligible for the \$500.00 incentive HAP payment if the contract is executed for a transfer of units with the same landlord, or if the contract is executed due to a lease renewal or change. Additionally, properties owned or managed by CH+R would be ineligible for this incentive HAP payment.

Agency goals for MTW Activity:

The goal of this activity is to incentivize landlords to continue their participation in the HCV program. The Existing Landlord Incentive payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The Existing Landlord Incentive will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and also encourage landlords to seek out additional voucher tenants rather than relying on the open market.

**How many payments were issued under this policy in the most recently completed PHA fiscal year?**

0

**What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?**

\$0

**5.a. - Pre-Qualifying Unit Inspections (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW**

**activity contributes to a larger initiative**

Description:

CH+R will allow prequalifying unit inspections (also known as a pre-inspection). Passing pre-qualifying inspections will be valid for 90 days from the passed inspection date. Participants will be able to request an interim inspection after move-in as needed.

Agency goals for MTW Activity:

The apartment industry relies on a seamless turnover to meet its overhead costs and the financial implications of such delays are sufficient to deter them from participating in the program. Property owners lose rental revenue trying to get an HQS inspection scheduled for the individual apartment units...when in fact the family is ready to move in immediately. So not only do they lose but the voucher holder loses too because they are anxious to move in and find housing.

This activity will accelerate the lease-up process and minimize property owners' lost revenue during a period of vacancy and make the process closer to the unassisted rental market, which will incentivize their participation and/or retention in the voucher program all in service of increasing housing choice for voucher holders/households.

The goal of these inspections is to lessen the time it takes for a voucher holder to move into a unit and encourage participation from new landlords in zip codes of opportunity by offering additional customer service. New landlords can understand the current HUD inspection standards through a pre-qualifying inspection, quickly make their repairs, and then be ready for a voucher holder tenant. The voucher holder will be able to move into the unit faster because they will not be waiting on an inspection, which may fail the first time and take more time to pass a re-inspection. Landlords will decrease their vacancy time and income lost. The pre-qualifying unit inspections are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. Pre-qualifying unit inspections will shorten the timeframe landlords must wait during the Request For Tenancy Approval and normal inspection process (a deterrent for some landlords) and ensure more quality units are available to voucher holders.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

No

**How long is the pre-inspection valid for?**

The pre-inspection is valid for 90 days.

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

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

CH+R will perform HQS inspections on project-based units that it owns, manages, and/or controls.

Agency goals for MTW Activity:

Streamline the HQS inspection process to match non-PHA owned HQS inspections. This waiver supports CH+R's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.

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

Cost effectiveness

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

Decreased expenditures

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

No

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

Following will explain the quality assurance method

A CH+R supervisor will re-inspect a sample of units (10% quarterly) for quality control of HQS inspections in accordance with 24 CFR 982.405(b) and 24 CFR 985.2

No document is attached.

#### **5.d. - Alternative Inspection Schedule (HCV)**

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

Description:

CH+R currently conducts biennial inspections after 1 year on the program.

Under the MTW demonstration, during the next scheduled biennial inspection, if the unit passes at the first inspection, the tenant will change to a triennial inspection. This will only be applicable to families that have stayed in place and have not only passed an inspection after 1 year, but also after biennial inspection. So, the family will not be eligible for a triennial inspection until after their 3rd year on the program.

Agency goals for MTW Activity:

This will help CH+R increase property owner participation and create more housing choice for voucher holders.

This activity will open opportunities for a greater number of first-time and existing property owners to consider leasing under CH+R's voucher program. In term of retaining greater percentages of existing property owners participating in our voucher program, will help stabilize tenancies, reduce voucher-assisted households' costs relating to the frequency of their involuntary moves and result in administrative cost savings to CH+R. Having more property owners participate in the voucher program will also lead to greater choice to voucher holders/households.

As an important but third-party, to the greatest extent possible CH+R encourages property owners and voucher-assisted households to communicate and to maintain their respective responsibilities to maintain decent, safe, and sanitary housing conditions in compliance with HQS. Like all other aspects of being a tenant, voucher-assisted households present no greater risk than unassisted tenants and participating property owners who receive a reasonable rent comparable with unassisted dwelling units are expected to maintain their units like unassisted property owners. To this end, after a dwelling unit has passed an initial HQS inspection and it is properly maintained by the property owner and the tenant's use of the property is within normal wear and tear, the need for CH+R to conduct annual HQS inspections when both parties can live up to their respective obligations similar to property owners and tenants in the private sector, is something that CH+R would like to help foster through this MTW activity. By doing so in a responsible fashion, CH+R believes that voucher-assisted households' transition into self-sufficiency for those that go into unassisted rental housing, this practice will help facilitate that transition.

With a measured approach, voucher participants will still be able to request an interim inspection for CH+R's inspection and enforcement measures, if applicable. CH+R will adopt a sound policy regarding the criterion under which qualifying units can be inspected less frequently but at least once every three years.

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

Cost effectiveness; Self-sufficiency; Housing choice

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

Decreased expenditures

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

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

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

Currently assisted households only

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

The MTW activity applies to all family types

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

The MTW activity applies to all tenant-based units

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

No

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

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

CH+R will increase the number of authorized units it project-bases.

Agency goals for MTW Activity:

Sometimes, people do not necessarily associate affordable housing at 30% of low-income households' monthly adjusted income in both tenant-based voucher and project-based assistance programs as directly relating to self-sufficiency. However, the PBV program offers households with housing costs at a 30% affordability threshold. With the right type of wrap around services pertinent to each population type and household, coupled with this activity and safe harbor waiver,

CH+R believes that significantly greater numbers of households will be able to become self-sufficient.

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

Self-sufficiency

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

The MTW activity applies to all assisted households

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

No

**What percentage of total authorized HCV units will be authorized for project-basing?**

50.00%

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

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

CH+R may raise the Project Based Voucher cap within a project up to 100%.

Agency goals for MTW Activity:

Create family stability in an environment with support to encourage family self-sufficiency.

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

Self-sufficiency

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

The MTW activity applies to all assisted households

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

No

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

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

CH+R will eliminate the selection process in the award of PBV to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site.

Agency goals for MTW Activity:

Streamline the selection process for PBV. This waiver supports CH+R's larger goal of using MTW flexibility to streamline administrative processes

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

No

**9.d. - Alternative PBV Selection Process (HCV)**

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

Under this activity, CH+R will eliminate the selection process in the award of PBVs to properties owned by CH+R that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. CH+R's goal for this request is to increase cost effectiveness by eliminating this process and increase housing choice. CH+R will be requesting a Safe Harbor Waiver for this activity for 9.c.iii. Please note that CH+R is requesting a waiver under 5.c. that will allow our agency to inspect PHA-owned PBV units. In the event that HUD determines that the 5.c. waiver does not apply to PBV units selected under 9.c.iii, CH+R is submitting this safe harbor waiver request to conform to the requirements of the MTW Operations Notice and will be implementing this activity with all other safe harbor limits established by the MTW Operations Notice.

Agency goals for MTW Activity:

This waiver supports CH+R's larger goal of using MTW flexibility to streamline administrative processes.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

No

**9.f. - Increase PBV HAP Contract Length (HCV)**

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

CH+R may lengthen the PBV HAP contract length.

Agency goals for MTW Activity:

This waiver supports CH+R's larger goal of using MTW flexibility to both streamline administrative processes in the PBV HAP contract length terms that can be offered for cost effectiveness and to provide greater affordability in voucher-assisted households' income to housing cost burdens which directly impacts their long-term self-sufficiency.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

No

**17.c. - Housing Development Programs**

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

Description:

CH+R will report the rent payments of public housing households that enroll in the program to one or more credit bureaus. CH+R has selected this option because it believes that assisting residents and program participants to build positive credit history is a key component to increasing financial well-being and pursuing other economic activities and advancement. Having poor or no credit history can affect an individual's ability to lease a rental unit, secure a job, purchase essential goods and services, and invest in longer-term assets such as homes and businesses.

CH+R must seek to report all public housing rent payments (on-time, late, and missed) for the public housing households participating in the credit building program to one or more credit bureaus at regular intervals. Rent reporting should be in accord with standard practices that protect consumers, such as not reporting unpaid balances that are small.

Households will have the opportunity to learn more about the program before deciding whether to opt in and enroll in the program through an informed consent process. During the informed consent process, CH+R will explain all potential risks and benefits of participating in the credit building program, and households will be able to withdraw their participation at any time.

Agency goals for MTW Activity:

CH+R's goal in implementing this initiative is to assist public housing households with building their credit, which will unlock other opportunities related to financial goals and economic self-sufficiency activities such as career advancements, investing in homes and/or business

activities, expanded housing opportunities and choice, and increased economic security and personal satisfaction.

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

Self-sufficiency

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

No

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

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

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	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
2022	\$739,130	\$639,190	\$99,940	2023-09-30

<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> 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.	
<b>Income Level</b>		<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
80%-50% Area Median Income		
49%-30% Area Median Income		
Below 30% Area Median Income		
Total Local, Non-Traditional Households		<b>0</b>

\*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.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> No	
<b>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.</b> CH+R is considering the option of excluding earned employment income in rent calculations based on a tiered system of 0% the first year, 50% the second year, 75% the third year and 100% the 4th year.	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
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?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
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To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

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

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

I.	Evaluations.
	No known evaluations.

## **Concord Housing & Redevelopment Authority's MTW Hardship Policy**

CH+R has created a hardship policy for when a requirement or provision of certain MTW activities constitutes a financial or other hardship for an CH+R household. CH+R will review its hardship policy with clients during the intake and recertification processes. The resident must sign and submit consent forms for obtaining information requested by CH+R necessary to consider if a resident qualifies for a hardship exemption. The agency will also consider if a client qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity. When a client requests a hardship exemption from an MTW activity included in this policy, CH+R will suspend the activity for the household beginning the next month after the request until CH+R has determined if the request is warranted. Hardship information will be retained by CH+R for the duration of CH+R's participation in the MTW demonstration program.

### **Activity: 2.a. – Small Area Payment Standards –Fair Market Rents (SAFMR) (HCV)**

In order to qualify for a hardship exemption, households must meet all of the criteria listed below:

1. The household is in compliance with all the program rules and regulations.
2. The household does not owe CH+R any money or is current with a re-payment agreement.
3. The household must be admitted to the program prior to October 1, 2023.
4. The household has not relocated on or after October 1, 2023.
5. The household must experience an increase of 5 percent or more in rent as a direct result of the MTW rent reform initiatives.
6. The household must request the hardship waiver within 10 business days from the date of the letter notifying them of change and giving the timeline in which to request an Informal Hearing or hardship review.
7. The household has not received a rent reform hardship relief for the Payment Standards application at interim recertification previously.

Hardship relief for households who qualify and receive waiver approval may pay their portion of rent based on the calculation under HUD regulations until their next reexamination / recertification or relocation. At the next reexamination / recertification, or relocation, whichever comes first, the household will automatically be subject to the payment standards set by CH+R at that time.

Each household is only eligible for one term of relief for the payment standards initiative.

**MTW Impact Analyses  
Concord Housing & Redevelopment Authority**

<b>Activity</b>	<b>Activity 2.a. Payment Standards-Small Area Fair Market Rents (SAMFR) (HCV)</b>
<b>Fiscal Year</b>	<b>FY 2023</b>
<b>Program</b>	<b>Voucher Program (HCV)</b>
1. Impact on the agency’s finances	Utilizing SAFMRs as the basis for CH+R’s payment standards within the 80% to 150% range, in conjunction with its “rent reasonableness” system, is intended to help achieve the following goals - increase the number of families served with modest amounts of HAP reserves, while maintaining affordable income to housing cost burdens overall and ensuring good housing quality stock and providing opportunities to lease in opportunity areas. Over time, the use of SAFMR-based payment standards that are more finely attenuated to submarkets within CH+R’s service area, will result in relatively greater HAP expenditures in some areas and relatively lower HAP expenditures in other areas, with modest HAP cost savings.
2. Impact on the affordability of housing costs for affected families	None
3. Impact on the agency’s waitlist(s)	Over time, this activity is intended to enable CH+R to serve more eligible households from its waiting list by maximizing the use of limited Federal HAP funding efficiently and effectively, but also by helping some families to become self-sufficient from the voucher program.
4. Impact on the agency’s termination rate of families	None
5. Impact on the agency’s current utilization rate in the HCV program	None
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	<p>This activity increases CH+R’s ability to meet the statutory goals of housing choice and self-sufficiency. This activity will allow CH+R to adopt and implement a reasonable policy to establish payment standards based upon applicable Small Area Fair Market Rents (SAFMRs). CH+R may use this flexibility to establish payment standards for grouped ZIP code areas between 80% and 150% of the applicable SAFMRs, based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc., or may establish payment standards for each ZIP code within its jurisdiction.</p> <p>This activity will increase the CH+R’s ability to encourage self-sufficiency and increase housing choices</p>

	<p>for HCV participants by utilizing mobility counseling and Small Area Fair Market Rent (SAFMR) payment standards.</p> <p>CH+R's goal is to utilize a comprehensive approach to expand housing opportunities for HCV participants and to increase landlord participation in the HCV Program. This will be done through SAFMRs and the provision/access to information to families with neighborhood data and information to exercise their choices about where to live.</p>
<b>7.</b> Impact on the agency's ability to meet MTW statutory requirements	None
<b>8.</b> Impact on the rate of hardship requests and the number granted and denied as a result of this activity	None
<b>9.</b> Impact on protected classes (and any disparate impact)	This activity is expected to have no disparate impact on protected classes.

<b>Activity</b>	<b>Activity 4.c. – Other Landlord Incentives - New Landlord Incentive (HCV)</b>
<b>Fiscal Year</b>	<b>FY 2023</b>
<b>Program</b>	<b>Voucher Program (HCV)</b>
1. Impact on the agency’s finances	<p>CH+R is considering the offer a one-time incentive HAP payment of \$1,000 to new landlords, upon the execution of a new HAP contract for an MTW tenant-based HCV participant. Landlords would be eligible for this payment yearly, based on a new contract with a new tenant. A “new landlord” would be defined as a landlord who has not rented to a tenant-based voucher participant within the past twelve (12) months. The landlord would not be eligible for the \$1,000 incentive HAP payment if the contract is executed for a transfer of units with the same landlord, or if the contract is executed due to a lease renewal or change. Additionally, properties owned or managed by CH+R would be ineligible for this incentive.</p> <p>In 2022, CH+R had 20 landlords that had not participated in its voucher program in 2021. At \$1,000 per “new landlord” it would cost approximately \$20,000 per year for the new landlord activity.</p>
2. Impact on the affordability of housing costs for affected families	None
3. Impact on the agency’s waitlist(s)	None
4. Impact on the agency’s termination rate of families	None
5. Impact on the agency’s current utilization rate in the HCV program	None
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	<p>Housing choice</p> <p>The goal of this activity is to incentivize landlords to continue their participation in the HCV program. The New Landlord Incentive payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The New Landlord Incentive will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and encourage landlords to seek out additional voucher tenants rather than relying on the open market.</p>
7. Impact on the agency’s ability to meet MTW statutory requirements	None
8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity	None
9. Impact on protected classes (and any disparate impact)	This activity is expected to have no disparate impact on protected classes.

**ATTACHMENT I**  
**Moving to Work Certifications of Compliance**

**CERTIFICATIONS OF COMPLIANCE**

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
**OFFICE OF PUBLIC AND INDIAN HOUSING**

**Certifications of Compliance with HUD and Federal Requirements and Regulations:**  
**Board Resolution to Accompany Application to the Moving to Work Demonstration Program**

Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the application to the Moving to Work (MTW) Demonstration Program for the PHA and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the application and implementation thereof:

- (1) The PHA will adhere to the MTW Operations Notice or successor notice and all requirements therein.
- (2) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure at least 75% of families assisted are very low-income as defined in Section 3(b)(2) of the 1937 Act throughout the PHA's participation in the MTW Demonstration Program.
- (3) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in establishing a reasonable rent policy that is designed to encourage employment and self-sufficiency.
- (4) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to assist substantially the same total number of eligible low-income families as would have been served absent MTW throughout the PHA's participation in the MTW Demonstration Program.
- (5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program throughout the PHA's participation in the MTW Demonstration Program.
- (6) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.
- (7) The PHA published a notice that a hearing would be held, that the application and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the application by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the application and invited public comment.
- (8) The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the application by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the application.

- (9) The PHA certifies that the Board of Commissioners 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).
- (10) The PHA certifies that it will carry out its application in conformity with: Title VI of the Civil Rights Act of 1964 (42 USC 2000d-2000d-4); the Fair Housing Act (42 USC 3601-19); Section 504 of the Rehabilitation Act of 1973 (29 USC 794); Title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.); all regulations implementing these authorities; other applicable Federal, State, and local civil rights laws; and that it will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)).
- (11) The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2) and will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (12) The application is consistent with the applicable Comprehensive Plan (or any plan incorporating such provisions of the Comprehensive Plan) for the jurisdiction in which the PHA is located.
- (13) The application certifies that according to the appropriate State or local officials that the application is consistent with the applicable Consolidated Plan.
- (14) The PHA complies 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.
- (15) The PHA complies with the Violence Against Women Act and its implementing regulations at 24 C.F.R. Part 5, Subpart L and Parts 960 and 966.
- (16) The PHA complies with the Architectural Barriers Act of 1968 and its implementing regulations at 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (17) The PHA complies 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 75.
- (18) The PHA complies with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (19) The PHA complies 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 and implementing regulations at 49 CFR Part 24.
- (20) The PHA complies 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.

- (21) The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (22) The 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 PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (23) With respect to public housing the 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.
- (24) The PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (25) The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (26) The PHA will comply with the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards at 2 CFR Part 200.
- (27) The application and all attachments are available at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Concord Housing + Redevelopment

NH 005

PHA NAME

PHA NUMBER/HA CODE

*I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.S. §3729, 3802).*

Jacqueline Whatmough

Board Chairperson

NAME OF AUTHORIZED OFFICIAL\*

TITLE

J Whatmough

10/31/2023

SIGNATURE

DATE

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