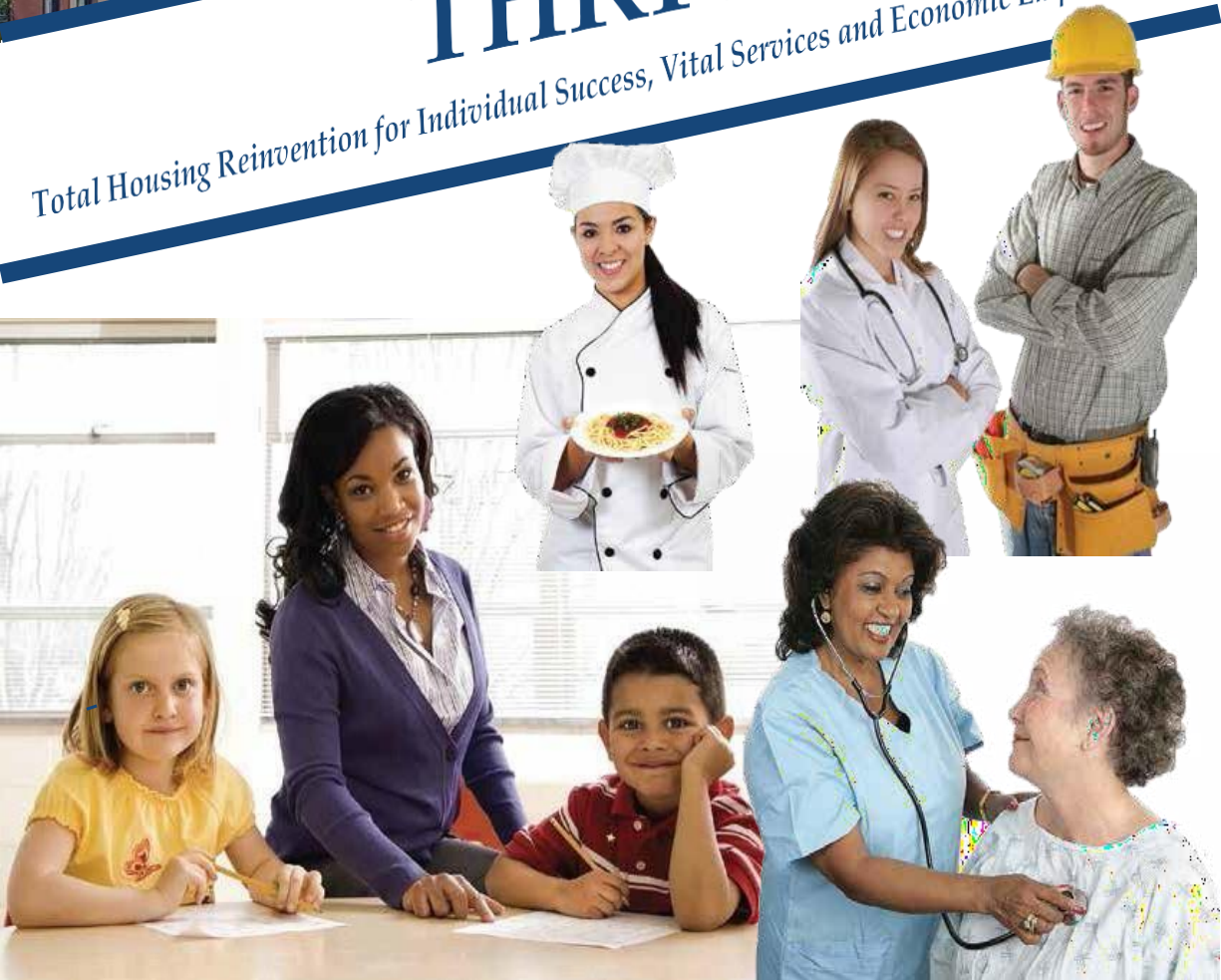




THRIVE

Total Housing Reinvention for Individual Success, Vital Services and Economic Empowerment



Moving to Work Report
Fiscal Year 2022

Submitted October 7, 2022
Revised October 3, 2023

The Mission

The mission of the Fairfax County Redevelopment and Housing Authority is to initiate and provide opportunities for Fairfax County residents to live in safe, affordable housing and to help develop, preserve, and revitalize communities through fiscally responsible and open processes.

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I. Introduction

Moving to Work (MTW) is a demonstration program that offers Public Housing Authorities (PHAs) the opportunity to design and test innovative, locally designed housing and self-sufficiency strategies for low-income families by allowing exemptions from existing Public Housing and tenant-based Housing Choice Voucher rules. The program also permits PHAs to combine operating, capital, and tenant-based assistance funds into a single agency-wide funding source, as approved by the U.S. Department of Housing and Urban Development (HUD).

Through its Moving to Work designation, the Fairfax County Redevelopment and Housing Authority (FCRHA) provides a continuum of affordable housing, ranging from rental vouchers to moderately priced rental apartments and townhouses, as well as affordable programs for homeownership.

The FCRHA uses the flexibility that comes with the Moving to Work designation to:

- Create a **housing continuum** that seamlessly couples the County's *local housing programs and Federal housing programs* and moves customers toward the greatest level of self-sufficiency they can attain.
- Expand its **strong community partnerships** with non-profit organizations to provide self-sufficiency services.
- Reduce the regulatory burden both on staff and customers, to allow a greater focus on **people – not paperwork**.
- **Align housing resources with community needs**, consistent with the County's yearly adopted "Housing Blueprint."

Overview of the FCRHA'S Short-Term MTW Goals and Objectives

The Fiscal Year (FY) 2022 Moving to Work Plan did not include any new activities but was amended in February 2022. The amended plan repropose Activity 2021-2, Project-Based Vouchers Rental Assistance Demonstration Admissions Policy and made non-significant changes to several other activities. Throughout the first half of the fiscal year, the FCRHA continued to implement several waivers provided by HUD in response to the COVID-19 pandemic. Most of the waivers expired in December 2021, and operations have since returned to pre-pandemic practices and policies. However, several changes that were initially made at the onset of the COVID-19 pandemic proved to be effective and are now being implemented through MTW authority.

In FY 2022, the FCRHA launched a renewed focus on resident engagement activities. This was primarily conducted through a survey sent to all MTW households to better understand the successes and challenges faced by residents and through a new resident advisory committee. The FCRHA will continue to build on these initial client engagement activities to better meet the needs of households in terms of self-sufficiency and housing mobility.

The FCRHA also authorized the use of MTW funds for gap financing as part of our Local Non-Traditional Activity (LNT) (Activity 2021-1). The use of reserves for this LNT activity is an increasingly valuable tool which is helping to create more long-term affordable housing units located in high opportunity areas throughout Fairfax County; it is also a tool that is being leveraged by other funding sources and tax credits to further MTW dollars.

Following is a list of the FCRHA's Moving to Work activities that are discussed in this report:

IMPLEMENTED	2014-1	Reduce Frequency of Reexaminations
	2014-2	Eliminate Mandatory Earned Income Disregard Calculation
	2014-3	Streamline Inspections for Housing Choice Voucher Units
	2014-5	Institute a Minimum Rent
	2014-6	Design and Initiate a Rent Reform Controlled Study
	2014-9	Increase the Family Share of Rent from 30 Percent to 35 Percent of Family Income in the Housing Choice Voucher and Rental Assistance Demonstration Project-Based Voucher Program
	2016-2	Modify Project-Based Voucher Choice Mobility Criteria
	2017-1	Modify the Family Self-Sufficiency Program
	2017-3	Authorization to Establish a Local Moving to Work Project-Based Voucher Program
	2018A-1	Modify the Calculation of the Family Share of Rent
	2018A-2	Establish Shared Housing Program for Rental Assistance Demonstration Project-Based Voucher Program
	2018A-3	Increase Initial Maximum Tenant Rent Burden to 45 Percent
	2019-1	Establish Fairfax County Payment Standards
	2021-1	Affordable Housing Acquisition and Development
	2021-2	Rental Assistance Demonstration Project-Based Voucher Program Admissions Policy
NOT YET IMPLEMENTED	2016-1	Use Moving to Work Funds for Local, Non-Traditional Housing Program
CLOSED	2014-4	Streamline Inspections for Public Housing Residents
	2014-7	Convert Scattered-Site Public Housing Units to Project-Based Section 8 Assistance
	2014-8	Allow Implementation of Reduced Payment Standards at Next Annual Reexamination
	2015-1	Eliminate Flat Rents in the Public Housing Program
	2017-2	Establish a Gateway to Housing Choice Voucher Program from the Tenant-Based Rental Assistance Program

Highlights of the FCRHA's short-term goals for FY 2022 include:

1. **Renewed Emphasis on Resident Engagement.** In FY 2022, the FCRHA conducted a resident engagement survey of MTW households. The intent of the survey was to gain a better understanding of some of the opportunities and challenges that households face, particularly as related to self-sufficiency issues and housing choice. The FCRHA will continue to build on the survey findings by working with residents to identify ways in which MTW authority can be used to better assist households, particularly in reducing barriers to moving and helping to connect households to resources available in the community.
2. **Rent Reform Controlled Study.** In FY 2022, the FCRHA completed the rent reform controlled study and worked closely with the evaluation team to gain an understanding of the impact of the work stabilization deduction on self-sufficiency measures. The study concluded at the end of FY 2022 and a report on findings is attached as an Appendix. As discussed in the report, the research team could not conclude that the work stabilization deduction had a positive impact on the study households. The impact of the ongoing COVID-19 pandemic and other hypothesized factors may have affected the study outcomes.
3. **Monitored the Impact of the COVID-19 Pandemic on Residents.** To help households mitigate various economic and health challenges due to the pandemic, the FCRHA continued to implement CARES Act Waivers for the first half of the fiscal year. The FCRHA continues to monitor households impacted by these waivers, as the majority have now expired, and most operations have resumed as they were before the pandemic. The cost of renting in Fairfax County continues to steadily increase, another issue the FCRHA is closely monitoring to understand its impact on MTW households with a tenant-based voucher.

Overview of the FCRHA'S Long-Term MTW Goals

Moving to Work provides the opportunity for the FCRHA to not only focus on short-term goals, but also to utilize block grant flexibilities to preserve, expand, and facilitate affordable housing opportunities in Fairfax County. According to the Virginia Center for Housing Research, the total affordable housing gap in Fairfax County for low -income renters is approximately 37,535 units. To that end, a long-term Moving to Work goal of the FCRHA is to realize savings through its federal programs—both through efficiencies in the programs, as well as ultimately moving families to self-sufficiency—and *to utilize these savings for the development or redevelopment of affordable housing*. This will continue to be a long-term goal of the FCRHA.

II. General Housing Authority Information

A. Housing Stock Information

i. Actual New Project-Based Vouchers					
<i>Tenant-based vouchers that the MTW PHA project-based for the first time during the Plan Year. These include only those in which at least an AHAP was in place by the end of the Plan Year.</i>					
Property Name	Number of Vouchers Newly Project-Based		Status at End of Plan Year**	RAD?	Description of Project
	Planned*	Actual			
N/A	N/A	N/A			
	N/A	N/A	Planned/Actual Total Vouchers Newly Project-Based		
* Figures in the "Planned" column should match the corresponding Annual MTW Plan.					
** Select "Status at the End of Plan Year" from: Committed, Leased/Issued					
Please describe differences between the Planned and Actual Number of Vouchers Newly Project-Based: N/A					

ii. Actual Existing Project-Based Vouchers					
<i>Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP was in place by the beginning of the Plan Year.</i>					
Property Name	Number of Vouchers Newly Project-Based		Status at End of Plan Year**	RAD?	Description of Project
	Planned*	Actual			
New Lake Anne House	102	122	Leased	No	Housing for seniors and individuals with a disability
Oakwood South Nine	8	0	Issued	No	Housing for seniors and individuals with a disability
One University	25	0	Issued	No	Housing for seniors and individuals with a disability
RAD-PBV 1	1060	1014	Leased	Yes	Multifamily
RAD-PBV 2	108	108	Leased	Yes	Multifamily
	1,303	1,244	Planned/Actual Total Vouchers Newly Project-Based		
* Figures in the "Planned" column should match the corresponding Annual MTW Plan.					
** Select "Status at the End of Plan Year" from: Committed, Leased/Issued					
Please describe differences between the Planned and Actual Existing Number of Vouchers Project-Based: <i>There were two competitions for Project-Based Vouchers (PBVs) at New Lake Anne House including one for 20 PBVs and another for 102 PBVs (total of 122). Both Oakwood South Nine and One University were still under construction at the end of FY 2022. 46 units of RAD-PBV were offline due to redevelopment.</i>					

iii. Actual Other Changes to MTW Housing Stock in the Plan Year
<i>Examples of the types of other changes can include (but are not limited to): Units held off-line due to relocation or substantial rehabilitation, local non-traditional units to be acquired/developed, etcetera.</i>
Actual Other Changes to MTW Housing Stock in the Plan Year
N/A

iv. General Description of All Actual Capital Expenditures During the Plan Year
<i>Narrative general description of all capital expenditures of MTW funds during the Plan Year.</i>
<i>N/A – MTW Funds were not used for capital expenditures in FY 2022</i>

B. Leasing Information

i. Actual Number of Households Served					
<i>Snapshot and unit month information on the number of households the MTW PHA actually served at the end of the Plan Year.</i>					
Number of Households Served Through:	Number of Unit Months Occupied/Leased*		Number of Households Served **		
	Planned^^	Actual	Planned^^	Actual	
MTW RAD	12,720	11,220	1,060	935	
MTW Housing Choice Vouchers Utilized	45,375	43,968	3,781	3,664	
<i>Planned/Actual Totals</i>	58,095	55,188	4,841	4,599	
<p>* Planned Number of Unit Months Occupied/Leased is the total number of months the MTW PHA planned to have leased/occupied in each category throughout the full Plan Year (as shown in the Annual MTW Plan).</p> <p>** Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year (as shown in the Annual MTW Plan).</p> <p>^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan</p>					
Please describe differences between the Planned and Actual households served:					
<p>The FCRHA is currently in the process of returning to 100% utilization by the end of Calendar Year 2022. The focus during FY 2022 was on special purpose vouchers including EHV, Mainstream, FUP and others. The number of RAD-PBV households leased was also less than planned due to efforts to place current households in appropriately sized units.</p>					
Local, Non-Traditional Category	MTW Activity Name/Number	Number of Unit Months Occupied/Leased*		Number of Households to be Served*	
		Planned^^	Actual	Planned^^	Actual
N/A	N/A	N/A	N/A	N/A	N/A
<i>Planned/Actual Totals</i>		0	0	0	0
<p>* The sum of the figures provided should match the totals provided for each Local, Non-Traditional category in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.</p> <p>^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan</p>					
Households Receiving Local, Non-Traditional Services Only	Average Number of Households per Month	Total Number of Households in the Plan Year			
N/A	N/A	N/A			

ii. Discussion of Any Actual Issues/Solutions Related to Leasing	
<i>Discussion of any actual issues and solutions utilized in the MTW housing program listed.</i>	
Housing Program	Description of Actual Leasing Issues and Solutions
MTW Public Housing	N/A
MTW Housing Choice Voucher	N/A

C. Waitlist Information

i. Actual Waiting List Information				
<i>Snapshot information on the actual status of MTW waiting lists at the end of the Plan Year. The "Description" column should detail the structure of the waiting list and the population served.</i>				
Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open, or Closed	Was the Waiting List Opened During the Plan Year
HCV: Tenant-Based	MTW Housing Choice Voucher Program	1832	Closed	No
Public Housing/RAD	RAD Project-Based Vouchers	2683	Closed	No
Please describe any duplication of applicants across waiting lists:				
<i>Applicants can apply to multiple rental assistance programs and often appear on multiple wait lists.</i>				

ii. Actual Changes to the Waiting List in the Plan Year	
<i>Please describe any actual changes to the organization structure or policies of the waiting lists(s), including any opening or closing of a waiting list, during the Plan Year.</i>	
Waiting List Name	Description of Actual Changes to Waiting List
Housing Choice Voucher: Tenant-Based	N/A
Housing Choice Voucher: Project-Based	N/A

D. Information on Statutory Objectives and Requirements

i. 75% of Families Assisted are Very Low Income	
<i>HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW PHA are very low income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA should provide data for the actual families housed upon admission during the PHA's Plan Year reported in the "Local, Non-Traditional; Tenant-based"; "Local, Non-Traditional: Property-Based", and "Local, Non-Traditional: Homeownership" categories. Do not include households reported in the "Local, Non-Traditional Services Only" category.</i>	
Income Level	Number of Local, Non-Traditional Households Admitted in the Plan
80-50% Area Median Income	N/A
49-30% Area Median Income	N/A
Below 30% Area Median Income	N/A
Total Local, Non-Traditional Households Admitted	0

ii. Maintain Comparable Mix

HUD will verify compliance with the statutory requirement that MTW PHAs continue to serve a comparable mix of families by family size by first assessing a baseline mix of family sizes served by the MTW PHA prior to entry into the MTW demonstration (or the closest date with available data) and compare that to the current mix of family sizes served during the Plan Year.

Baseline Mix of Family Sizes Served (upon entry to MTW)

Family Size	Occupied Public Housing Units	Utilized HCVs	Non-MTW Adjustments	Baseline Mix Number	Baseline Mix Percentage
1 Person	312	1,158	0	1,470	34%
2 Person	275	710	0	985	23%
3 Person	185	493	0	678	16%
4 Person	125	355	0	480	11%
5 Person	86	289	0	375	9%
6+ Person	59	238	0	298	7%
Total	1,042	3,244	0	4,286	100%

** Non-MTW Adjustments are defined as factors that are outside the control of the MTW PHA. An example of an acceptable "Non-MTW Adjustment" would include demographic changes in the community's overall population. If the MTW PHA includes "Non-MTW Adjustments," a thorough justification, including information substantiating the numbers given, should be included below.*

Please describe the justification for any "Non-MTW Adjustments" given below:

N/A

Mix of Family Sizes Served (in Plan Year)

Family Size	Baseline Mix Number	Baseline Mix Percentage**	# of Households Served in Plan Year^	% of Households Served in Plan Year^^	Percentage Change from Baseline Year to Current Plan Year
1 Person	1,470	34%	1,901	41%	7%
2 Person	985	23%	1,002	22%	-1%
3 Person	678	16%	609	13%	-3%
4 Person	480	11%	489	11%	0%
5 Person	375	9%	313	7%	-2%
6+ Person	298	7%	285	6%	-1%
Total	4,286	100%	4,599	100%	0%

*** The "Baseline Mix Percentage" figures given in the "Mix of Family Size Served (in Plan Year)" table should match those in the column of the same name in the "Baseline Mix of Family Sizes Served (upon entry to MTW)" table.*

^ The "Total" in the "Number of Households Served in Plan Year" column should match the "Actual Total" box in the "Actual Number of Households Served in the Plan Year" table in Section II.B.i of this Annual MTW Report.

^^ The percentages in this column should be calculated by dividing the number in the prior column for each family size by the "Total" number of households served in the Plan Year. These percentages will reflect adjustment to the mix of families served that are due to the decisions of the MTW PHA. Justification of percentages in the current Plan Year that vary by more than 5% from the Baseline must be provided below.

Please describe the justification for any variances of more than 5% between the Plan Year and Baseline Year:

The FCRHA added properties to the MTW baseline, both of which are serving more single-person households compared to other types of properties. Also, the overall population in Fairfax County is aging, which is resulting in more single-person households than in the past.

iii. Number of Households, across MTW activities, that were transitioned to the MTW PHA's local definition of self sufficiency during the Plan Year.		
MTW Activity Name/Number	Number of Households Transitioned to Self-Sufficiency	MTW PHA Local Definition of Self Sufficiency
Alternate Recertification / 2014-1	39 HCV residents; 6 RAD-PBV residents	No longer receiving subsidy
Minimum Rent / 2014-5	39 HCV residents; 6 RAD-PBV residents	No longer receiving subsidy
Rent Control Study / 2014-6	39 HCV residents; 6 RAD-PBV residents	No longer receiving subsidy
Family Self-Sufficiency / 2017-1	39 HCV residents; 6 RAD-PBV residents	No longer receiving subsidy
35% Family Share / 2014-9	39 HCV residents; 6 RAD-PBV residents	No longer receiving subsidy
Modify Calculation of Rent / 2018A-1	39 HCV residents; 6 RAD-PBV residents	No longer receiving subsidy
	39 HCV residents; 6 RAD-PBV residents	Total Households Transition to Self Sufficiency

** Figures should match the outcome reported where metrics SS#8 is used in Section IV of this annual MTW Report.*

III. Proposed MTW Activities: HUD Approval Requested

All proposed and re-proposed MTW Activities that were granted approval by HUD are reported in Section IV as Approved Activities.

IV.A. Approved MTW Activities: Implemented

The following Moving to Work activities are currently implemented. A summary and status update on these activities follows:

ACTIVITY	
2014-1	Reduce Frequency of Reexaminations
2014-2	Eliminate Mandatory Earned Income Disregard Calculation
2014-3	Streamline Inspections for Housing Choice Voucher Units
2014-5	Institute a Minimum Rent
2014-6	Design and Initiate a Rent Reform Controlled Study
2014-9	Increase the Family Share of Rent from 30 Percent to 35 Percent of Family Income in the Housing Choice Voucher and Rental Assistance Demonstration Project-Based Voucher Program
2016-2	Modify Project-Based Voucher Choice Mobility Criteria
2017-1	Modify the Family Self-Sufficiency Program
2017-3	Authorization to Establish a Local Moving to Work Project-Based Voucher Program
2018A-1	Modify the Calculation of the Family Share of Rent
2018A-2	Establish Shared Housing Program for Rental Assistance Demonstration Project-Based Voucher Program
2018A-3	Increase Initial Maximum Tenant Rent Burden to 45 Percent
2019-1	Establish Fairfax County Payment Standards
2021-1	Affordable Housing Acquisition and Development
2021-2	Rental Assistance Demonstration Project-Based Voucher Program Admissions Policy

2014-1 Reduction in Frequency of Reexaminations

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2014
- Implemented: FY 2014 and FY 2018
- Amended: FY 2020

Description of Activity

The objectives of this activity are to provide a work incentive for all families and to reduce the burden on staff and households by reducing the frequency of income reexaminations. This activity allows for the following:

- Reexaminations are conducted every two years for work-able households. Families that claim to have zero income continue to meet with FCRHA staff regularly.
- Reexaminations for non work-able households are conducted every five years.
- Interim increases (i.e., increases in income between reexaminations) are disregarded until the next scheduled reexamination.
- Interim decreases (i.e., a reported decrease in income) are limited to one during a calendar year and no interim decreases during the first six months after initial occupancy.

The FCRHA began to implement this activity in FY 2014 by informing HCV households and households in the Public Housing Pilot Portfolio (now RAD-PBV) about the new reexamination cycle. These changes were completely phased in by June 2016. In January 2018, the FCRHA began implementation of the interim policy on reporting increases or decreases in income between reexaminations. In addition, in FY 2018 the definitions of work-able and non work-able were clarified. In FY 2020, this activity was updated through a Technical Amendment in response to the COVID-19 pandemic. Specifically, non work-able households moved to a five-year recertification schedule. This change impacted recertifications beginning June 2020.

Update

Setting the non work-able households to a five-year reexamination cycle allowed for continued administrative relief for staff and participants throughout FY 2022.

Impact

In FY 2022, the FCRHA was able to reduce the number of RAD-PBV reexaminations by 59 (from 329 reexaminations in FY 2021 to 270 reexaminations in FY 2022). The reexaminations for HCV households also declined, from 1,711 reexaminations in FY 2021 to 868 in FY 2022. The impact of the policy appears to be positive, in terms of reducing the administrative burden of reexaminations on both households and staff. The FCRHA, however, will continue to closely monitor this activity to ensure that households do not become overly rent burdened.

Activity Metrics

CE#1: AGENCY COST SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total cost of task in dollars (decrease)</i>	<p>This baseline was set using FY 2014 data.</p> <p>\$30.2386 average hourly pay of reexamination specialists X 19,345 total staff hours for reexaminations (see CE #2 baseline)</p> <p>= \$584,965 total cost for reexaminations</p>	<p>This activity was initially implemented in FY 2016.</p> <p>\$30.2386 average hourly pay of reexamination specialists X 18,334 total staff hours for reexaminations = \$554,394 total cost for reexaminations</p>	<p>\$41.77 average hourly pay of reexamination specialists X 10,200 total staff hours for reexaminations (see CE#2 benchmark)</p> <p>= \$426,054 total cost for reexaminations</p>	<p>There was a cost savings due to this alternate reexamination schedule.</p>

CE#2: STAFF TIME SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total time to complete the task in staff hours (decrease).</i>	<p>This baseline was set using FY 2014 data. Survey of staff revealed that staff spends on average 5 hours processing each reexamination.</p> <p>5 hours X 3,532 HCV reexaminations=17,660 HCV staff hours + 5 hours X 337 PH Pilot Portfolio reexaminations =1,685 PH staff hours =19,345 total staff hours for reexaminations.</p>	<p>5 hours X 3,532 HCV reexaminations = 17,660 HCV staff hours + 5 hours X 337 Pilot PH reexaminations = 1,685 PH staff hours = 19,345 total staff hours dedicated to reexaminations.</p>	<p>In FY 2022, there were 868 HCV reexaminations; there were also 270 RAD-PBV reexaminations for a total of 1,138 reexaminations.</p> <p>5 hours x 1,138 total reexaminations = 5,690 total staff hours dedicated to reexaminations.</p>	<p>There was savings of staff time due to this activity.</p>

CE#5: INCREASE IN AGENCY RENTAL REVENUE				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Rental revenue in dollars (increase).</i>	<p>FY 2014 HCV estimated HAP disbursements were \$43,389,711.</p> <p>FY 2014 Public Housing estimate rental revenue was \$5,248,624.</p>	<p>No change in rental revenue is expected in FY 2016 as a result of alternate reexaminations.</p> <p>FY 2015 HCV estimated HAP disbursements are \$42,440,227.</p> <p>FY 2015 Public Housing estimated rental revenue is \$6,187,194.</p>	<p>FY 2022 HAP disbursements were \$53,008,324</p> <p>FY 2016 Public Housing actual rental revenue was \$5,939,438.</p>	<p>There was no change in agency rental revenue as a result of alternate reexaminations.</p> <p>This activity was not designed to impact agency rental revenue.</p>

SS#1: INCREASE IN HOUSEHOLD INCOME				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Average earned income of households affected by this policy in dollars (increase).</i>	<p>This baseline was set using FY 2014 data.</p> <p>Average earned income of HCV households is \$24,504.</p> <p>Average earned income of PH households in the Pilot PH program is \$24,993.</p>	<p>Expected average earned income of HCV households was \$24,504 in FY 2014.</p> <p>Expected average earned income of PH households was \$24,993 in FY 2014.</p> <p>Update for FY 2016: Data used was total annual income previous. The metric is now being calculated using earned income.</p>	<p>The average earned income of HCV households in FY 2022 was \$10,501; average total annual income was \$18,112.</p> <p>The average earned income of RAD-PBV households in FY 2022 was \$12,889; average total annual income was \$19,576.</p>	<p>A change in earned income is not expected due to this activity. The FCRHA will be analyzing factors which influence household income and earnings to determine possible ways to improve this outcome for households.</p>

SS#3: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
1. Employed Full-Time	Full-time employment is not tracked separately from part-time employment. They will be reported together under (6) below.	N/A	N/A	N/A
2. Employed Part-Time	Part-time employment is not tracked separately from full-time employment. They will be reported together under (6) below.	N/A	N/A	N/A
3. Enrolled in an Educational Program	This data was not tracked previously prior to FY 2015 and required the addition of a new data element to the database. The initial baseline is zero.	No change in the number of heads of households enrolled in an educational program is expected as a result of Alternate Reexaminations. This will be tracked in the PH Pilot. The benchmark is zero.	In FY 2022, 41 HCV residents were enrolled in an education or training program; 24 RAD-PBV residents were enrolled in an education or training program.	A change in enrollments in education or training programs is not expected due to this activity. Efforts are underway to develop a better method in Yardi to determine educational enrollment.
4. Enrolled in Job Training Program	This data was not previously tracked prior to FY 2015 and required the addition of a new data element to the database. The initial baseline is zero.	FY 2015 marked the beginning of this activity (FY 2015 for the PH Pilot Portfolio and FY 2016 for HCV).	In FY 2022, 41 HCV residents were enrolled in an education or training program; 24 RAD-PBV residents were enrolled in an education or training program.	A change in job training enrollments is not expected due to this activity. Efforts are underway to develop a better method in Yardi to determine enrollments in job training programs.
5. Unemployed	In FY 2014, the total number of families with a head of household that was neither elderly nor disabled (i.e. "employable"), and had no earned income is 664.	No change in the number of unemployed heads of households is expected as result of alternate reexaminations. The total number of families in HCV	In FY 2022, there were 744 HCV residents who were work-able and had no earned income; there were 174 RAD-PBV residents who were work-able and had no earned income.	No additional outcome is expected.

		program/PH Pilot portfolio with a head of household that is neither elderly nor disabled and has no earned income is 664 in FY 2014.		
6. Other: Employed Part- or Full-Time	The total number of families with a head of household that is neither elderly nor disabled (i.e. "employable"), and has earned income is 1495 in FY 2015.	No change in the number of employed heads of households is expected as a result of alternate reexaminations. The total number of families with a head of household that is neither elderly nor disabled and has earned income in FY 2015 is 1,495.	In FY 2022, there were 1,215 HCV residents who were work-able and had earned income; there were 395 RAD-PBV residents who were work-able and had earned income.	No additional outcome is expected.

SS#4: HOUSEHOLDS REMOVED FROM TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households receiving TANF assistance (decrease).</i>	Total number of Public Housing and HCV households receiving TANF assistance is 181.	No change in the number of households receiving TANF is expected as a result of alternate reexaminations.	In FY 2022, there were 83 HCV residents receiving TANF; there were 22 RAD-PBV residents receiving TANF.	The number of households receiving TANF has slightly increased; however, a change in TANF enrollment is not necessarily due to this activity.

SS#8: HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>For the purposes of collecting this metric only, the FCRHA is defining self-sufficiency as a household that is no longer receiving subsidy (in HCV) or is at 100% AMI (in PH).</i>	The baseline is zero.	No households are expected to transition to self-sufficiency because of alternate reexaminations. The benchmark is zero.	In FY 2022, 39 HCV residents transitioned to self-sufficiency; 6 RAD-PBV residents transitioned to self-sufficiency.	A change in the number of households transitioning to self-sufficiency is not expected due to this activity.

Annual Reevaluation of Rent Reform Initiative: Outcomes will be measured and reviewed annually using the metrics described above and, if necessary, the activity will be revised to mitigate negative impacts.

Hardship Case Criteria: Families impacted by the reduction in the frequency of reexaminations are subject to the FCRHA's Hardship Policy. There were fewer than 15 hardship requests in FY 2022.

Actual Non-Significant Changes

There were no non-significant changes in FY 2022.

Actual Changes to Metrics/Data Collection

There are no changes to the metrics or data collection to report for this activity in FY 2022.

Actual Significant Changes

There were no significant changes in FY 2022.

Challenges to Achieving Benchmarks and Possible Strategies

The FCRHA continues to closely monitor the number of households who are rent burdened, particularly among non work-able families. If a household's portion of rent and utilities increases to a level greater than 42% of their adjusted gross annual income, the most current payment standard is applied prior to the five-year recertification upon request.

2014-2 Eliminate Mandatory Earned Income Disregard Calculation

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Year Approved: FY 2014
- Implemented: FY 2014
- Amended: N/A

Description of Activity

As part of the HUD-mandated EID calculation, any family in the Public Housing or HCV program that included a member(s) with disabilities, was eligible for EID when an unemployed or under-employed family member obtained a job or increased their wages. The resulting income increase was fully excluded for 12 months and 50 percent excluded for an additional 12 months. In FY 2011, only 52 families in the FCRHA's Public Housing and HCV programs benefited from the EID calculation.

In the FY 2014 Moving to Work Plan, the FCRHA proposed eliminating the HUD-mandated EID calculation and in February 2014 began notifying affected families. To allow families to prepare for any potential changes in rent, families that received notification within three months of their reexaminations were phased out at their second annual reexamination. The FCRHA completed this activity and eliminate all use of the EID calculation in Fiscal Year 2015.

Update

This activity is fully implemented. There are no updates in FY 2022.

Impact

There was no impact on households due to this activity in FY 2022, as the EID calculation was eliminated in FY 2015. The EID is being used for households with an Emergency Housing Voucher (non-MTW).

Activity Metrics

CE#1: AGENCY COST SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total cost of task in dollars (decrease).</i>	\$30.2386 average hourly staff pay X 130 staff hours to track EID calculations (see CE #2) = \$3,931 total cost to track EID calculations.	The EID calculation has been eliminated. The benchmark is a cost savings of \$3,931.	FY 2015--\$31.13 average hourly staff hours X 130 staff hours = \$4,046.90 savings.	The benchmark was achieved in FY 2015. The difference between the expected and actual cost of this task is due to staff pay.

CE#2: STAFF TIME SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total time to complete the task in staff hours (decrease).</i>	Survey of staff revealed that staff spends on average 2.5 hours tracking EID calculations. 2.5 hours X 52 households with EID = 130 total staff hours to track EID calculations.	The EID calculation has been eliminated. The benchmark is a staff time savings of 130 hours.	The estimated time savings in FY 2015 was 130 staff hours.	The benchmark was achieved and completed in FY 2015.

CE#3: DECREASE IN ERROR RATE OF TASK EXECUTION				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Average error rate in completing a task as a percentage (decrease).</i>	The average error rate associate with EID calculations was 6 percent in FY 2014.	The EID calculation has been eliminated. There are no errors associated with this task. The benchmark is zero percent error rate.	Since the EID calculation was eliminated, the actual error rate is zero percent.	The benchmark was achieved and completed in FY 2015.

CE#5: INCREASE IN AGENCY RENTAL REVENUE				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Rental revenue in dollars (increase).</i>	FY 2014 HCV estimated HAP disbursements are \$43,389,711. FY 2014 Public Housing estimated rental revenue is \$5,248,624.	Due to a limited number of families benefiting from the EID calculation, a negligible increase in rental revenue is anticipated.	FY 2016 HCV actual HAP disbursements was \$46,931,597. FY 2016 Public Housing actual rental revenue was \$5,939,438.	There was no change of agency rental revenue in FY 2015 because of the elimination of the EID. This activity was completed in FY 2015.

Actual Non-Significant Changes

This activity was amended in FY 2022 and not closed as was initially reported. The FCRHA continues to implement this activity.

Actual Changes to Metrics/Data Collection

There are no changes to the metrics or data collection to report for this activity.

Actual Significant Changes

There are no significant changes to report regarding this activity.

Challenges to Achieving Benchmarks and Possible Strategies

There are no challenges expected to achieve the benchmarks related to this activity.

2014-3 Streamlined Inspections for Housing Choice Voucher and Rental Assistance Demonstration Project-based Voucher Units

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2014
- Implemented: FY 2014 and FY 2018
- Amended: FY 2020 and FY 2021

Description of Activity

This activity reduces costs associated with conducting inspections, encourages owners to maintain their units, and incentivizes families to employ good housekeeping practices. The following applies:

- HCV units are inspected on a triennial basis. When this activity was first approved, HCV inspections were changed from annual to biennial; this change was then permitted through regulation and therefore the activity was closed out in FY 2018. The activity was later amended due to the COVID-19 pandemic and the need to reduce in-person meetings. In FY 2021 the activity was amended again for all HCV units to be inspected on a triennial basis.
- RAD-PBV units are inspected biennially by property. Approximately 50 percent of RAD-PBV properties are inspected in one calendar year (all units in those properties) and the other 50 percent are inspected in the next calendar year (all units in those properties).

Tenants, owners, or a third-party can request Special Inspections at any time, and any complaints received by the FCRHA from a tenant, owner or third-party may revert a unit back to an annual inspection cycle. Additionally, all units are subject to Quality Control Inspections and the FCRHA specifically focuses those inspections on households less likely to report unsafe or unsanitary conditions. Inspection staff follow HQS protocol including using HUD Form 52580 for all inspections. Streamlining inspections reduces staff time spent on inspections of units that are historically of high-quality and provides an incentive for families to maintain their units via less frequent inspections.

Update

There were no changes made to this activity in FY 2022. This activity is fully implemented.

Impact

Due to the COVID-19 pandemic, inspections during FY 2022 were completed in accordance with the HUD waiver requirements per the CARES Act.

Activity Metrics

CE#1: AGENCY COST SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total cost of task in dollars (decrease).</i>	The baseline was set using FY 2014 data. \$29.56 average hourly pay of HCV inspectors X 7,280 total staff hours (see CE #2)= \$215,197 total cost of HCV inspections	The benchmark is \$215,197.	\$31.15 average hourly pay of HCV inspectors x 6,752 total staff hours = approximately \$210,324.80 total cost of HCV inspections in FY 2022. This outcome is based on HCV inspectors returning to conducting in-person inspections and resuming a full workload as the COVID-19 pandemic restrictions diminished; The inspection staff resources were reduced at the end of September 2021 and were not renewed.	Yes. Although there is a cost decrease from FY14, this was due to the reduction in inspection staff during FY 2022.

CE#2: STAFF TIME SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total time to complete the task in staff hours (decrease).</i>	The baseline was set using FY 2014 data. 3.5 HCV inspectors X 2080 hours = 7,280 total staff hours.	The benchmark is 7,280 total staff hours.	Approximately 6,752 staff hours were spent conducting inspections in FY 2022.	Staff time decreased significantly due to the reduction of inspection staff during FY 2022

CE#3: DECREASE IN ERROR RATE OF TASK EXECUTION				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Average error rate in completing a task as a percentage (decrease).</i>	Error rate on inspections must be tracked manually. No data is currently available.	The FCRHA does not expect a decrease in the error rate of HCV inspections as a result of biennial unit inspections. The average error rate of HCV inspections is less than 1 percent.	In FY 2022, the error rate of inspections was less than one (1) percent.	Yes, however the outcome for FY 2022 was based on the number of inspections being completed with the HUD waiver requirements by 6/30/2022.

Actual Non-Significant Changes

There were no non-significant changes in FY 2022.

Actual Significant Changes

There were no significant changes to this activity in FY 2022.

Actual Changes to Metrics/Data Collection

There are no changes to the metrics or data collection to report for this activity.

Challenges to Achieving Benchmarks and Possible Strategies

Due to the COVID-19 pandemic, the normal cycle of HQS inspections of HCV and RAD-PBV units were modified in accordance with HUD waiver requirements through the CARES Act. These waivers allowed for modified inspections procedures and provided flexibilities to complete the inspections by 6/30/2022, to meet compliance standards. The FCRHA anticipates improved outcomes for this activity in the upcoming fiscal years as the waivers have expired and inspections have resumed based on standard business practices.

2014-5 Institute a New Minimum Rent

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2014
- Reproposed: FY 2016
- Implemented: FY 2018
- Amended: FY 2018

Description of Activity

To encourage families to seek employment and stay employed, the FCRHA set a new minimum rent based on working wages. Specifically, the FCRHA increased the minimum rent from \$50 to \$220 per month for work-able families. This rent is based on one family member working 20 hours per week for four weeks during the month earning the minimum wage of \$7.25.

Annual Reevaluation of Rent Reform Initiative

Outcomes are measured and reviewed annually and, if necessary, the activity will be revised to mitigate negative impacts.

Hardship Case Criteria

Families eligible for the minimum rent are subject to the FCRHA's Hardship Policy. In FY 2022, there were fewer than 15 hardship requests.

Update

The FCRHA began implementation of the minimum rent activity in FY 2015. Technical delays and the conversion of public housing units to Rental Assistance Demonstration-Project-Based Vouchers resulted in a delay in implementation of this activity. In FY 2020, this activity was fully implemented among work-able HCV. In addition, the minimum rent was applied in the rent reform controlled study.

Activity Metrics

SS#1: INCREASE IN HOUSEHOLD INCOME				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Average earned income of households affected by this policy in dollars (increase).</i>	<p>This baseline was set using FY 2014 data.</p> <p>Average earned income of HCV households is \$24,504.</p> <p>Average earned income of Public Housing households is \$24,993.</p>	<p>Expected average earned income of HCV households is \$24,504.</p> <p>Expected average earned income of Public Housing households is \$24,993.</p> <p>This benchmark is being adjusted to look at earned income, not annual income.</p>	<p>The average earned income of HCV households in FY 2022 was \$10,501; average total annual income was \$18,112.</p> <p>The average earned income of RAD-PBV households in FY 2022 was \$12,889; average total annual income was \$19,576.</p>	<p>No. The FCRHA will be analyzing factors which influence household income and earnings to determine possible ways to improve this outcome for households.</p>

SS#3: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
1. Employed Full-Time	Full-time employment is not tracked separately from part-time employment. They will be reported together under (6) below.	N/A	N/A	N/A
2. Employed Part-Time	Part-time employment is not tracked separately from full-time employment. They will be reported together under (6) below.	N/A	N/A	N/A
3. Enrolled in an Educational Program	This data was not previously tracked prior to FY 2015 and required the addition of a new data element to the database. The initial baseline is zero.	No change in the number of heads of households enrolled in an educational program is expected. This will be tracked in the Public Housing Pilot. The benchmark is zero.	In FY 2022, 41 HCV residents were enrolled in an education or training program; 24 RAD-PBV residents were enrolled in an education or training program.	A change in education or training enrollments is not expected due to this activity. Efforts are underway to develop a better method in Yardi to determine educational enrollment.
4. Enrolled in Job Training Program	This data was not previously tracked prior to FY 2015 and required the addition of a new data element to the database. The initial baseline is zero.	No change in the number of heads of households enrolled in a training program is expected.	In FY 2022, 41 HCV residents were enrolled in an education or training program; 24 RAD-PBV residents were enrolled in an education or training program.	A change in job training enrollments is not expected due to this activity. Efforts are underway to develop a better method in Yardi to determine job training enrollments.
5. Unemployed	In FY 2014, the total number of families with a head of household that was neither elderly nor disabled (i.e. "employable"), and had no earned income is 664.	No change in the number of unemployed heads of households is expected. The total number of families with a head of household that is neither	In FY 2022, there were 744 HCV residents who were work-able and had no earned income; there were 174 RAD-PBV residents who were work-able and had no earned income.	No additional outcome is expected.

		elderly nor disabled and has no earned income is 664.		
6. Other: Employed Part- or Full-Time	The total number of families with a head of household that is neither elderly nor disabled (i.e. "employable"), and has earned income is 1495.	No change in the number of employed heads of households is expected. The total number of families with a head of household that is neither elderly nor disabled and has earned income was 1495 in FY 2015.	In FY 2022, there were 1,215 HCV residents who were work-able and had earned income; there were 395 RAD-PBV residents who were work-able and had earned income.	No additional outcome is expected.

SS#4: HOUSEHOLDS REMOVED FROM TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households receiving TANF assistance (decrease).</i>	Total number of Public Housing and HCV households receiving TANF assistance is 181.	No change in the number of households receiving TANF is expected. Total number of Public Housing and HCV households receiving TANF assistance is 181.	In FY 2022, there were 83 HCV and 22 RAD-PBV households receiving TANF	The total number of households receiving TANF has slightly increased, but most likely not exclusively due to this activity.

SS#6: REDUCING PER UNIT SUBSIDY COSTS FOR PARTICIPATING HOUSEHOLDS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).</i>	The average monthly subsidy was \$1,118 prior to implementation of this policy.	The average monthly subsidy per unit was not expected to change as a result of this activity.	In FY 2022 the average assistance was \$1201	The average monthly subsidy has increased slightly since FY 2014.

SS#7: INCREASE IN AGENCY RENTAL REVENUE				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>PHA rental revenue in dollars (increase).</i>	In FY 2015, the actual rental revenue was \$5,467,446.	In FY 2016, the estimated rental revenue is \$6,228,558.	N/A since the FCRHA no longer operates Public Housing.	N/A since the FCRHA no longer operates Public Housing.

SS#8: HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>For the purposes of collecting this metric only, the FCRHA is defining self-sufficiency as a household that is no longer receiving subsidy (in HCV) or is at 100% AMI (in PH).</i>	The baseline is zero.	The benchmark is zero.	In FY 2022, 39 HCV and 6 RAD-PBV households transitioned to self-sufficiency.	Yes, but most likely this was due to a combination of factors and not exclusively to this activity.

Actual Non-Significant Changes

There are no non-significant changes regarding this activity.

Actual Changes to Metrics/Data Collection

There are no changes to the metrics or data collection to report for this activity.

Actual Significant Changes

There are no significant changes to report regarding this activity.

Challenges to Achieving Benchmarks and Possible Strategies

The FCRHA will continue to closely monitor the ability of residents to meet their rent, identify whether more households are rent burdened, and adjust this activity as necessary. This will remain important, particularly for households with a tenant-based voucher, as market rents are increasing in Fairfax County, vacancy rates are low, and rent is projected to continue to increase over the next few years.

2014-6 Design and Initiate a Rent Reform Controlled Study

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2014
- Reproposed: FY 2016
- Implemented: FY 2018
- Amended: FY 2018

Description of Activity

The Rent Reform Controlled Study, a HUD requirement for the FCRHA's designation as an MTW agency, was an alternate rent strategy for incentivizing families to increase their income and savings through a simplified approach to calculating a family's adjusted income by:

- Excluding income directly related to achieving self-sufficiency, such as income from training programs and student financial assistance;
- Utilizing a "work stabilization" deduction when calculating a household's Total Tenant Payment (TTP), which equals 20 percent of the family's gross earned income;
- Implementing income reexaminations every two years so families can take advantage of income increases without a resulting rent increase;
- Providing case management services that focus on moving families toward self-sufficiency and assistance with employment;
- Providing incentives for families that meet self-sufficiency goals; and
- Implementing a minimum rent to further encourage families to work.

The FCRHA anticipated rent reform activities will result in the following:

- an increase in average household income;
- an increase in average household savings;
- fewer households on TANF; and
- a reduction in the average unit subsidy of households.

The FCRHA began initial implementation of the rent reform controlled study in 2015, including applying the minimum rent activity and identifying an initial pilot group of residents at three public housing properties. Unfortunately, a technical roadblock occurred in updating the Yardi system. While the contract negotiations were occurring with Yardi, the three public housing sites were converted to Rental Assistance Demonstration – Project-Based Voucher units (RAD-PBV). The combination of the RAD-PBV conversion and delay in the Yardi upgrade resulted in a pause on the full implementation of this activity.

In November 2018, the FCRHA re-started the rent reform controlled study and entered into a contract with Virginia Tech to evaluate the effect of a rent subsidy for participating households. The initiative randomly selected work-able households from Rental Assistance Demonstration-Project Based Voucher (RAD-PBV) properties to participate in a control and study group. All potential participants were notified, offered the opportunity to participate, and households determined whether they would participate. Those that participated in the study met with the Rent Reform Housing Service Specialist for their recertification. The study concluded at the end of FY 2022.

Impact Analysis

The FCRHA did not anticipate that the rent reform study would disproportionately affect households in any specific group; elderly and disabled households were not a part of the study. The evaluation

confirmed this notion and did not find any evidence that households were disproportionately impacted. The FCRHA anticipated that the reduced rent, coupled with incentives, would result in increased household savings, achievement of family self-sufficiency goals, and movement of families along the housing continuum.

Annual Reevaluation of Rent Reform Initiative

Outcomes were measured throughout the initiative and reviewed quarterly using standard metrics. The evaluators and FCRHA staff met quarterly to review outcomes and discuss any questions.

Hardship Case Criteria

Families in the study were subject to the FCRHA's Hardship Policy. No household, participating in the rent reform controlled study requested a hardship in FY 2022.

Transition Period

All families in the study received at least a ninety-day notice prior to implementation of the new reform policies.

Update on Implementation of Activity/Timeline

The evaluation concluded at the end of FY 2022 (6/30/22). All participants in the control group received their last stipend and bonus for participation in June 2022; all participants in the study group will continue to receive the work stabilization deduction on earned income from the total tenant payment (TTP) calculation through the end of FY 2024. The final sample size for the duration of the study was 51 households (n=152 household members) and 37 control households (n=105 household members). Once all participating households were recertified to begin the study, quarterly reports from March 2020-2022 tracked average changes to monthly earned income, assets, and TTP, as well as the reported impact of the work stabilization deduction for study households and the impact of the COVID-19 pandemic on all households.

Impact

Based on the administrative data analysis, the research team could not conclude that the work stabilization deduction had a positive impact on the study households, primarily because the control households saw greater increases in average monthly earned income and assets over the course of the study period. The demographic differences between the study and control group households did not appear to be significant enough to fully explain why the control group fared relatively better. The overall gains for either group over the study period on average did not substantially lift households out of the extremely low-income category, though some households did move to the Housing Choice Voucher (HCV) program during the study and some younger, work-able members moved out of the household due to increased financial independence.

This lack of appreciable gains may point to broader factors, such as unemployment during the COVID-19 pandemic and related issues, having a unique impact on households' ability to increase their self-sufficiency during the study period. The research team found that a majority of both study and control groups were female, approximately 75% of the total cohort was non-white and did not speak English as a primary language, and the study group, in particular, had 20% more households with dependent children. While it was not known what types of jobs work-able members held or their level of education and English proficiency, it is possible that a significant percentage of work-able participants were negatively affected by COVID-19 trends, including high unemployment rates by sector and/or gender-related differences in employment and childcare responsibilities during the height of the pandemic.

Limitations to the evaluation included challenges during the recruitment process resulting in a small sample size, a lack of qualitative context to explain changes in the administrative data, and YARDI data collection and analysis complications. Because the evaluation occurred during the COVID-19 pandemic, findings from this study are difficult to connect to other rent reform controlled studies throughout the country that occurred prior to the COVID-19 pandemic. In general, the COVID-19 pandemic posed a significant challenge regarding how to interpret the findings from March 2020 onwards due to the uncertain employment environment as well as policy changes to mitigate the negative impacts of the pandemic experienced by participating households.

Please see the Appendix for the full evaluation on the rent reform controlled study.

Activity Metrics

SS #1: INCREASE IN HOUSEHOLD INCOME				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Average earned income of households affected by this policy in dollars (increase).</i>	<p>This baseline was set using FY 2014 data.</p> <p>Average earned income of HCV households is \$24,504.</p> <p>Average earned income of Public Housing households is \$24,993.</p>	<p>Expected average earned income of HCV households is \$24,504.</p> <p>Expected average earned income of Public Housing households is \$24,993.</p> <p>This benchmark is being adjusted to look at earned income, not annual income.</p>	In FY 2022, the average earned income of RAD-PBV households who were in the study group was \$17,737 (\$1,478/month).	No. There was no conclusive evidence that the work stabilization deduction increased earnings for the study group.

SS #3: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
1. Employed Full-Time	Full-time employment is not tracked separately from part-time employment. They will be reported together under (6) below.	N/A	N/A	N/A
2. Employed Part-Time	Part-time employment is not tracked separately from full-time employment. They will be reported together under (6) below.	N/A	N/A	N/A
3. Enrolled in an Educational Program	This data was not tracked previously prior to FY 2015 and required the addition of a new data element to the database.	No change in the number of heads of households enrolled in an educational program is expected. This will be tracked in the Public Housing	In FY 2022, there were 41 HCV residents enrolled in an education and/or training program; there were 24 RAD-PBV residents enrolled in an education	The rent reform evaluation did not monitor enrollment in educational programs.

	The initial baseline is zero.	Pilot. The benchmark is zero.	and/or training program as well.	
4. Enrolled in Job Training Program	This data was not previously tracked prior to FY 2015 and required the addition of a new data element to the database. The initial baseline is zero.	No change in the number of heads of households enrolled in a training program is expected.	In FY 2022, there were 41 HCV residents enrolled in an education and/or training program; there were 24 RAD-PBV residents enrolled in an education and/or training program as well.	The rent reform evaluation did not monitor enrollment in job training programs.
5. Unemployed	In FY 2014, the total number of families with a head of household that was neither elderly nor disabled (i.e. "employable"), and had no earned income is 664.	No change in the number of unemployed heads of households is expected. The total number of families with a head of household that is neither elderly nor disabled and has no earned income is 664.	9 work-able members of the study group were unemployed. This was approximately 12% of the study group participants. Approximately 15% of the control group participants were unemployed (7 work-able members)	Findings from the rent reform controlled study are inconclusive regarding unemployment among study group members. The effects of the COVID-19 pandemic may have influenced outcomes.
6. Other: Employed Part- or Full-Time	The total number of families with a head of household that is neither elderly nor disabled (i.e. "employable"), and has earned income is 1495.	No change in the number of employed heads of households is expected. The total number of families with a head of household that is neither elderly nor disabled and has earned income was 1495 in FY 2015.	54 members of the study group were employed (74%); 36 members of the control group were employed (77%).	Findings from the rent reform controlled study are inconclusive regarding employment among study group members. The effects of the COVID-19 pandemic may have influenced outcomes.

SS #4: HOUSEHOLDS REMOVED FROM TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households receiving TANF assistance (decrease).</i>	Total number of Public Housing and HCV households receiving TANF assistance is 181.	No change in the number of households receiving TANF is expected. Total number of Public Housing and HCV households receiving TANF assistance is 181.	In FY 2022, there were 83 HCV households on TANF and 22 RAD-PBV households on TANF (this is an overall figure inclusive of households included in the rent reform controlled study). Findings from the rent reform controlled study did not specifically track TANF usage.	The rent reform evaluation did not monitor enrollment in TANF.

2014-9 Increase the Family’s Share of Rent from 30 Percent to 35 Percent of Family Income in the Housing Choice Voucher and Public Housing Programs

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2014
- Implemented: FY 2014 and FY 2018
- Amended: FY 2018

Description of Activity

Along with other enacted cost saving activities, reforming the calculation used to determine the family’s share of rent and utilities has allowed the FCRHA to counteract fiscal constraints and close potential operating shortfalls. This activity:

- Increased the percentage from 30 percent to 35 percent of adjusted income.
- Applied the change to all families in both HCV and RAD-PBV programs, except for families on fixed incomes (only SSI, SSDI, SS, or pensions, or any combination of those sources). These families will continue to pay the highest of (1) 30 percent of adjusted income, (2) 10 percent of gross income, or (3) the FCRHA’s current minimum rent.

This was first approved in an amended FY 2014 Moving to Work Plan. The FCRHA notified affected families and landlords of the change late in FY 2014. The FCRHA began phasing in implementation of this activity with reexaminations starting July 1, 2014, and completed the phase in by June 2015.

Update

The activity has been fully implemented. Participants who have difficulty paying the minimum rent are informed of their ability to request a hardship; in FY 2022 there were fewer than 15 hardship requests.

Impact

Changes to the family share of rent have helped to increase cost efficiencies and avoid budget shortfalls. The ability of households to pay rent and utilities continues to be closely monitored to ensure that families to not become increasingly rent burdened. This is especially true given the increase in market rent in the local economy.

Activity Metrics

CE#5: INCREASE IN AGENCY RENTAL REVENUE				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Rental revenue in dollars (increase).</i>	FY 2014 HCV estimated HAP disbursements were \$43,389,711. FY 2014 Public Housing estimate rental revenue was \$5,248,624.	FY 2015 HCV estimated HAP disbursements are \$42,440,227. FY 2015 Public Housing estimated rental revenue is \$6,187,194.	FY 2016 HCV actual HAP disbursements were \$46,931,579. FY 2016 Public Housing actual rental revenue was \$5,939,438.	In the Public Housing program, there was an increase in rental revenue, attributed to this activity.

SS#8: HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>For the purposes of collecting this metric only, the FCRHA is defining self-sufficiency as a household that is no longer receiving subsidy (in HCV) or is at 100% AMI (in PH).</i>	The baseline is zero.	The benchmark is zero.	In FY 2022, there were 39 HCV residents who transferred to self-sufficiency and 6 RAD-PBV residents who transferred to self-sufficiency.	Yes, but this outcome is not attributable solely to this activity.

Actual Non-Significant Changes

There are no non-significant changes regarding this activity.

Actual Changes to Metrics/Data Collection

There are no changes to the metrics or data collection to report for this activity.

Actual Significant Changes

There are no significant changes to report regarding this activity.

Challenges to Achieving Benchmarks and Possible Strategies

There are no challenges expected to achieve the benchmarks related to this activity.

2016-2 Modify Project-Based Voucher Choice Mobility Criteria

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2014
- Implemented: FY 2014 and FY 2018
- Amended: FY 2021

Description of Activity

The FCRHA allows an alternative policy that prioritizes tenant vouchers for new families and limits the number of PBV holders that receive a tenant voucher in any given year. By modifying choice mobility criteria, the FCRHA reduces the wait time for families on its tenant-based voucher list, thereby expanding affordable housing opportunities for families not currently served.

This activity allows for the following:

- Maintain a waiting list of families that request to convert their project-based voucher to a tenant-based voucher.
- Allow PBV families that request to move, to be added to the “PBV to HCV conversion” waiting list after two years of residency.
- Allow approximately five percent of the projected tenant-based vouchers each fiscal year to be available for choice mobility of PBV holders

This activity does not apply to RAD-PBV projects. In addition, Choice Mobility is allowed for instances for reasonable accommodations and Violence Against Women Act (VAWA) cases.

Update

The activity has been fully implemented. There were no changes in FY 2022.

Impact

The change has limited the number of PBV households requesting a tenant-based voucher. Although this limits mobility for PBV residents, it enables more households to receive housing and come off waiting lists.

Activity Metrics

CE#1: AGENCY COST SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total cost of task in dollars (decrease).</i>	This data was not previously tracked.	There is no agency cost savings expected with this activity.	There were no agency cost savings in FY 2022	N/A

CE#2: STAFF TIME SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total time to complete the task in staff hours (decrease).</i>	This data was not previously tracked.	There is no staff time savings expected with this activity.	There were no savings in staff time due to this activity in FY22. Staff time has not changed since PBV households must be issued a tenant-based voucher and then new households must be leased up in vacated PBV units.	N/A

Actual Non-Significant Changes

There are no non-significant changes regarding this activity.

Actual Changes to Metrics/Data Collection

There are no changes to the metrics or data collection to report for this activity.

Actual Significant Changes

There were no significant changes to this activity in FY 2022.

Challenges to Achieving Benchmarks and Possible Strategies

The FCRHA faces an ongoing challenge of managing waiting list to achieve the 5% cap on the number of PBV households who are issued a tenant-based voucher. Self-sufficiency is increased for those on our waiting list by moving from unsubsidized to subsidized housing through a tenant-based voucher.

2017-1 Modifications to Family Self-Sufficiency Program

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Year Approved: FY 2017
- Implemented: FY 2017
- Amended: N/A

Description of Activity

The FSS program provides an opportunity for residents to set individualized goals that will assist them in moving toward increased self-sufficiency within a five-year period. The FCRHA proposed several changes to the FSS program in FY 2017. These modifications included:

1. Allow FSS Participants to Opt Out of Interest Payments on Escrow

An important component of the program is the participant's ability to grow assets – in the form of an escrow – over five years. The escrow accrues based on increases in a participant's total tenant payment due to increases in the participant's earned income. To ensure that the FCRHA is operating a diverse and inclusive program, this activity allows participants to opt out of accruing interest on their escrow. Prior to implementing this change, collecting interest on escrow accounts was cited as a barrier to participating in the program due to religious reasons for some residents.

Interest is calculated as normal throughout participation. Upon graduation or at an interim disbursement, participants can choose whether they would like to opt out or receive interest in their escrow disbursements.

2. Modify the Family Self-Sufficiency Escrow Structure

Upon graduation, the escrow a household accumulates during their participation in the FSS program is disbursed to them to be used as they wish. The escrow structure is as follows:

- Participants must pay a minimum of \$220 in rent before they can begin to escrow (this is called the rent "strike point").
- Once the participant reaches the rent strike point, the FCRHA will set up an escrow account and allocate a \$2,000 Homeownership Incentive Award each year the participant is escrowing and up to a maximum of \$10,000, contingent upon purchasing a home after the participant is eligible for graduation or for up to six months after graduation. If the participant does not purchase a home, this money will be forfeited.
- Once the rent strike point is met, monthly escrow will be calculated using a tiered system based on earned income. This money will be disbursed to the participant once they have completed all contract goals and are eligible for graduation from the FSS program. If the participant is purchasing a home utilizing their accrued Homeownership Incentive Award, they will receive both this escrow amount and the Homeownership Incentive Award when they are closing on their new home.

Participants can continue to participate in the FSS program until they reach the established income limits for RAD-PBV and HCV participation.

3. Establish a Work Requirement for Family Self-Sufficiency Participants

During the first four years of participation in the FSS program, all participants who have signed a service plan are required to engage in any combination of employment/training/education totaling 32 hours per week. Further, the participants are required to work 32-hours per week for at least 12 consecutive months prior to graduation.

Participants are required to document and verify employment at their quarterly progress meetings. Program extensions remain an option for participants who are in good standing and are left to the discretion of the service coordinator.

4. Exclude Income of Family Self-Sufficiency Head of Household Participants Who Are Enrolled Full Time in School

The following applies to FSS Head of Household members who are both working and enrolled in approved education programs:

- When the head of the FSS Household is enrolled full-time in an accredited and approved education program, 100 percent of the individual's earned income is excluded during months one through 12. During months 13 through 21, 50 percent of the individual's income is excluded.
- Participation is limited to a first degree. For example, an individual with a bachelor's degree will not be approved for an income exclusion to enroll in a second bachelor's degree program, however the exclusion could apply if the individual enrolls in an advanced certification/graduate certificate or graduate degree program.

Full time status is defined by each institution, and students are responsible for providing these documents for verification purposes. This is consistent with current FCRHA policy.

Update

This activity is fully implemented. There were no updates in FY 2022.

Impact

Like other MTW Activities, the COVID-19 pandemic continued to impact FSS households throughout FY 2022. Job recovery among FSS participants has been slow. The FCRHA will continue to closely monitor the economic status of FSS participants to identify trends/patterns in employment.

Activity Metrics

CE#1: AGENCY COST SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<p><i>Total cost of task in dollars (decrease).</i></p> <p>Activity 1: Opt-Out of Interest Payment</p> <p><i>**This activity was not intended as a cost saving measure.</i></p>	<p>\$0</p> <p><i>(No baseline cost was associated; households simply would not participate.)</i></p>	<p>\$0</p> <p><i>(It is anticipated that there may be an increase in cost as more households elect to participate.)</i></p>	N/A	<p>N/A</p> <p>Agency cost savings are not expected due to this activity.</p>
<p>Activity 2: Modify Escrow Structure</p> <p><i>**This activity was not intended as a cost saving measure.</i></p>	<p>\$4,979 average escrow balance</p> <p><i>(It is anticipated that there may be an increase in cost as more households elect to participate.)</i></p>	<p>\$8,000 average escrow balance</p> <p><i>*FY18 Revision: \$30,000 listed as original benchmark for Initial Yardi Programming costs.</i></p>	N/A	<p>N/A</p> <p>Agency cost savings are not expected due to this activity.</p>
<p>Activity 3: 32-Hour Work Requirement</p> <p><i>**This activity was not intended as a cost saving measure.</i></p>	<p>\$0</p> <p><i>(No baseline cost existed. Verification of employment was previously established as part of case management.)</i></p>	\$0	N/A	<p>N/A</p> <p>Agency cost savings are not expected due to this activity.</p>
<p>Activity 4: Student Income Exclusion</p> <p><i>**This activity was not intended as a cost saving measure.</i></p>	<p>\$0</p> <p><i>(It is anticipated that there may be an increase in cost as more households elect to participate.)</i></p>	<p>\$120,000</p> <p>Calculation: 20 households x average exclusion of \$20,000/30%.</p>	N/A	<p>N/A</p> <p>Agency cost savings are not expected due to this activity.</p>

CE#2: STAFF TIME SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<p><i>Total time to complete the task in staff hours (decrease).</i></p> <p>Activity 1: Opt-Out of Interest Payment</p> <p><i>**This activity was not intended as a staff time saving measure.</i></p>	<p>0 Hours</p> <p><i>(There is no baseline for staff time associated with this activity; households simply would not participate, therefore staff time was not impacted. An initial increase in staff time is anticipated, due to more households enrolling and subsequently graduating.)</i></p>	<p>3 Hours</p> <p>Calculation: 0.5 hours per household auditing and manually deducting interest.</p>	N/A	<p>N/A</p> <p>Staff time savings are not expected due to this activity.</p>
<p>Activity 2: Modify Escrow Structure</p>	<p>450 Hours</p> <p>1.5 hours/ transaction</p> <p><i>(3-Level review and approval required before escrow is credited to an account)</i></p>	<p>.25 hours/ transaction</p> <p><i>(3-Level review and approval required before escrow is credited to an account)</i></p>	N/A	<p>N/A</p> <p>Staff time savings are not expected due to this activity.</p>
<p>Activity 3: 32-Hour Work Requirement</p> <p><i>**This activity was not intended as a staff time saving measure.</i></p>	<p>136 Hours</p> <p><i>(based on 2 face-to-face meetings per year at 60 minutes each)</i></p>	<p>272 Hours</p> <p>Staff time is expected to increase by double with this activity (minimum requirement is 60 minute face-to-face on a quarterly basis).</p>	N/A	<p>N/A</p> <p>Staff time savings are not expected due to this activity.</p>
<p>Activity 4: Student Income Exclusion</p> <p><i>**This activity was not intended as a staff time saving measure.</i></p>	<p>0 Hours</p> <p>There was no cost associated prior to implementation of this activity.</p>	<p>10 Hours</p> <p>In addition to the 4 quarterly meetings. Staff will need to spend more hours ensuring that income not being paid to rent is utilized for self-sufficiency related goals.</p>	N/A	<p>N/A</p> <p>Staff time savings are not expected due to this activity.</p>

CE#3: DECREASE IN ERROR RATE OF TASK EXECUTION				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Average error rate in completing a task as a percentage (decrease).</i> Activity 1: Opt-Out of Interest Payment	0% There are no error reports associated with this task.	0% (3-Level review and approval process that prevents errors)	N/A	N/A Changes to error rates are not expected due to this activity.
Activity 2: Modify Escrow Structure	0% There are no error reports associated with this task.	0% (3-Level review and approval process that prevents errors)	N/A	N/A Changes to error rates are not expected due to this activity.
Activity 3: 32-Hour Work Requirement	0% There are no error reports associated with this task.	0% (3-Level review and approval process that prevents errors)	N/A	N/A Changes to error rates are not expected due to this activity.
Activity 4: Student Income Exclusion	0% There are no error reports associated with this task.	0% (3-Level review and approval process that prevents errors)	N/A	N/A Changes to error rates are not expected due to this activity.

SS#1: INCREASE IN HOUSEHOLD INCOME				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Average earned income of households affected by this policy in dollars (increase).</i> Activity 3: 32-Hour Work Requirement	\$21,726 Average earned income of FSS households (FY16)	\$25,000 Expected FY17 average earned income of FSS households (90).	\$17,188 in FY 2022 Average earned income of FSS participants (96 as of 6/30/2022)	Does not meet. Higher than usual number of unemployed participants is lowering the average.

SS#2: INCREASE IN HOUSEHOLD SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<p><i>Average amount of savings/escrow of households affected by this policy in dollars (increase).</i></p> <p>Activity 2: Modify Escrow Structure</p> <p><i>* Applies ONLY to new participants as of February 1, 2017</i></p>	<p>\$4,979</p> <p>The average escrow balance of FSS households.</p>	<p>\$5,000</p> <p>The FCRHA expects any average household assets increase to be negligible.</p>	<p>\$3,997 in FY 2022</p>	<p>No; this could be impacted by the COVID-19 pandemic.</p>

SS#3: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<p><i>Report the following information separately for each category:</i></p>	<p><i>Head(s) of households in FSS prior to implementation of Activity 3. This number may be zero.</i></p>	<p><i>Expected head(s) of households in FSS after implementation of Activity 3.</i></p>	<p><i>Actual head(s) of households in FSS after implementation of Activity 3.</i></p>	<p><i>Whether the outcome meets or exceeds the benchmark.</i></p>
1. Employed Full-Time	47 of 90 HoH	50% HoH	<p>52% in FY 2022</p> <p><i>(50 of 96 Households as of 6/30/2022)</i></p>	Exceeds
2. Employed Part-Time	21 of 90 HoH	25% HoH	<p>16 % in FY 2022</p> <p><i>(16 of 96 Households as of 6/30/2022)</i></p>	<p>Many of the FSS participants who were employed full time were able to work from home during the year, with employers making accommodations to allow remote work due to the COVID-19 pandemic. However, FSS participants who were employed part-time were often in positions that were hourly/seasonal and are not returning to those jobs.</p>
3. Enrolled in an Educational Program	90 of 90 HoH	35% HoH	<p>18% in FY 2022</p> <p><i>(18 of 96 Households)</i></p>	<p>With the transition to virtual trainings and the focus on short term trainings, more participants are</p>

				choosing job training rather than college.
4. Enrolled in Job Training Program	3 of 90 FSS HoH	5% HoH	15% in FY 2022 <i>(15 of 96 Households)</i>	Exceeds
5. Unemployed	11 of 90 HoH	10% HoH	31% in FY 2022 <i>(30 of 96 Households as of 6/30/2022)</i>	FSS Team will look for patterns to identify what is causing higher than normal unemployment.
6. Other: Employed Part- or Full-Time	N/A	N/A	N/A	N/A

SS#4: HOUSEHOLDS REMOVED FROM TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households receiving TANF assistance (decrease).</i>	2 HoH	5 HoH	4 HoH in FY 2022	Exceeds

SS#5: HOUSEHOLDS ASSISTED BY SERVICES THAT INCREASE SELF-SUFFICIENCY				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households receiving services aimed to increase self-sufficiency (increase).</i>	90 FSS households	125 FSS households	110 FSS households fell under these activities in FY 2022.	Staffing shortages the last 2 years limited the capacity to serve 125 families.

SS#6: REDUCING PER UNIT SUBSIDY COSTS FOR PARTICIPATING HOUSEHOLDS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).</i> Activity 4: Student Income Exclusion	\$1,144.	\$1,100.	\$1,032 4 of 96 participants are utilizing this exclusion in FY 2022.	

SS#8: HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.</i> Activity 4: Student Income Exclusion	0%	50% of graduates	66% 3 of 9 graduates moved to market homeownership. 1 of 9 graduates transitioned to the homeownership voucher program. 2 of 9 graduates transitioned to market rent.	Exceeds

Actual Non-Significant Changes

There were no non-significant changes for FY 2022.

Actual Changes to Metrics/Data Collection

There are no changes to the metrics or data collection to report for this activity.

Actual Significant Changes

There have been no significant changes to this activity.

Challenges to Achieving Benchmarks and Possible Strategies

There are no challenges expected to achieve the benchmarks related to this activity. The FCRHA is, however, reviewing the possible inclusion of additional metrics that will further reflect the intent of the FSS program. Most changes that have been made to the FSS program were implemented to encourage self-sufficiency and better serve participants, not realize program cost savings. Metrics such as the amount of debt participants can pay off; changes related to credit scores; changes to education status; and length of stay in housing are all issues that are currently being explored for potential inclusion in future MTW reports.

2017-3 Authorization to Establish a Local Moving to Work Project-Based Voucher Program

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2017
- Implemented: FY 2019
- Amended: FY 2019 and FY 2022

Description of Activity

To increase affordable housing options for participants and preserve affordable units, the FCRHA established a local project-based voucher program. There are four key components of this authorization:

1. The FCRHA can provide a commitment of project-based vouchers utilizing an alternative competitive process, such as the Public-Private Educational Facilities Infrastructure Act or locally administered procurement process, for:

- Development or redevelopment by the FCRHA of FCRHA- or Fairfax County-owned housing units or land;
- Development or redevelopment by private developers of FCRHA- or Fairfax County-owned housing units or land;
- Development or redevelopment by private developers utilizing FCRHA financing.

2. The FCRHA can utilize project-based vouchers for its own Fairfax County Rental Program units. Specific authorization from the FCRHA is requested for the commitment of project-based voucher projects under this authority. There continues to be a project-based voucher competition for other projects, as vouchers are available. Further, the FCRHA will inspect its own project-based voucher units, with requests for special inspections allowed from the occupants. The same Housing Quality Standards are used on FCRHA-owned units as with Housing Choice Voucher units. Authorization to waive independent entity requirements for inspections, rent reasonableness, and rent negotiations has been granted through the Third Amendment to the FCRHA's Moving to Work Plan. The FCRHA adopted the Third Amendment in April 2020 and now conducts its own inspections, rent reasonableness determinations, and rent changes at PBV units that are owned or operated by the FCRHA.

3. The FCRHA allows for a different subsidy standard for project-based vouchers than tenant-based vouchers. The subsidy standard for project-based vouchers is:

- One bedroom for the head of household (and spouse or cohead, if applicable);
- One bedroom for each two household members of the same sex, regardless of age or relationship;
- Persons of the opposite sex (other than spouse or cohead, if applicable) will be allocated a separate bedroom; and
- Any live-in aide (approved by the FCRHA to reside in the unit to care for a family member who is disabled or is at least 50 years of age) is allocated a separate bedroom.

4. The FCRHA offers protections for residents in instances of affordable housing development or redevelopment when the FCRHA awards PBVs using MTW authority or under a competitive process and where there are current residents at these properties. In instances of affordable housing development or redevelopment where new units are being constructed at the same or adjacent site(s) as an existing

property, the FCRHA has the authority to immediately move otherwise eligible current households residing at the property into the newly constructed PBV units without placing these households on waiting lists that are open to the public. This ensures that current residents are protected from displacement, are provided with housing choices, and can move into new units once eligibility is determined. Lacking this authority, households currently residing at properties in these situations would be subject to waiting list requirements and would be required to remain in the redeveloped portion of the property only or could be displaced

Update:

This activity was amended in FY 2022, adding the fourth component which offers protections in instances of development or redevelopment when the FCRHA awards PBVs and where there are current residents at these properties.

Impact

The local project-based voucher program continues to be utilized as needed. In FY 2022, the FCRHA did not commit any project-based vouchers utilizing MTW authority.

Activity Metrics

CE#4: INCREASE IN RESOURCES LEVERAGED				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Amount of funds leveraged in dollars (increase).</i>	0	N/A	N/A – No PBVs were awarded in FY22 under this activity	N/A – No PBVs were awarded in FY22 under this activity

HC#1: ADDITIONAL UNITS OF HOUSING MADE AVAILABLE				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.</i>	0	N/A	N/A - No PBVs were awarded in FY22 under this activity	N/A – No PBVs were awarded in FY22 under this activity

HC#5: INCREASE IN RESIDENT MOBILITY				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households able to move to a better units and/or neighborhood of opportunity as a result of the activity (increase).</i>	0	N/A	N/A – no PBVs were awarded in FY22 under this activity	N/A – No PBVs were awarded in FY22 under this activity

Actual Non-Significant Changes

There are no planned non-significant changes regarding this activity.

Actual Changes to Metrics/Data Collection

There are no planned changes to the metrics or data collection to report for this activity.

Actual Significant Changes

There are no planned significant changes to report regarding this activity.

Challenges to Achieving Benchmarks and Possible Strategies

There were no identified challenges to achieving benchmarks in FY 2022.

2018A-1 Modify the Calculation of the Family Share of Rent for the Housing Choice Voucher Program

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2018
- Implemented: FY 2018
- Amended: FY 2020

Description of Activity

In FY 2018, three strategies were implemented to provide savings to the Housing Choice Voucher program which are as follows:

1. Increase the Minimum Rent from \$50 to \$220 for Work-Able Households.

The amount that a household pays for rent and utilities (i.e., the family share of rent) in the Housing Choice Voucher Program is based on the higher of the following: \$220; ten percent of the family's monthly gross income; or 32 or 35 percent of the family's adjusted gross income. There are households that are provided an exemption to the \$220 minimum rent due to little or no income; these households pay a minimum rent of \$50.

2. Increase the Family Share of Rent from 30 to 32 percent for Non Work-Able Households and Implement a 35 Percent Family Share of Rent for All Work-Able Households.

An increase in the percentage of the family share of rent, for work-able households, from 30 to 35 percent was approved through the Amended FY 2014 Moving to Work Plan. The Amended FY 2018 Moving to Work Plan increased the family share of rent for non work-able families from 30 to 32 percent.

3. Revise the Utility Allowance for All Families.

When utilities are not included in the rent charged by the landlord, a flat allowance is provided for utilities that the household must pay directly to the utility provider. In some cases, when a family's share of rent is less than the utility allowance, a utility reimbursement check is sent to the household to assist them with paying for the utilities.

Project-Based Vouchers and Housing Choice Voucher Homeownership participants are exempt from Strategy #2 and #3. However, participants living in project-based voucher units who are work-able continue to pay 35 percent of their income for rent and utilities as approved by Moving to Work Activity 2014-9.

Changes were made to this activity in FY 2020 in response to the COVID-19 pandemic through a Technical Amendment. The activity was modified as follows:

1. Excluded asset income from income calculations for families with assets under \$50,000 and accepting self-certifications from households with these assets. If a household has assets above \$50,000, they can provide documentation of assets up to 120 days old.
2. Simplified income verification by: Accepting documentation that is up to 120 days old (instead of a maximum of 60 days old); and accepting self-certifications from program participants with income decreases during the COVID-19 pandemic. Program participants are contacted after 90 days and asked to verify their on-going income decrease.
3. Simplified medical/disability expense deductions by allowing for self-certification of expenses up to \$1,000; if a household has more than \$1,000 in expenses, the household is required to provide verification of these expenses.

Update

Waivers provided under the CARES Act were utilized for part of FY 2022 to streamline processes and provide relief to residents. The FCRHA will continue to review the impact of this activity on households, particularly since CARES Act waivers are no longer in place and operations have returned to what they were prior to the COVID-19 pandemic.

Impact

Overall, changes made through the Technical Amendment in FY 2020 have simplified processes for households and reduced administrative burden for staff. The FCRHA continues to utilize single fund flexibility to refer households for additional resources including assistance with benefits navigation, housing location, behavioral health consultation, and limited case management.

Activity Metrics

CE#1: AGENCY COST SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total cost of task in dollars.</i>	There are no agency savings regarding to implementing this activity; these saving are captured in CE #5	There are no agency savings regarding to implementing this activity; these saving are captured in CE #5.	There are no outcomes expected.	Meets

CE#2: STAFF TIME SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total time to complete the task in staff hours (decrease).</i>	There is no staff savings associated with this activity.	There is no staff savings associated with this activity.	There are no outcomes expected.	Meets

CE #3: DECREASE IN ERROR RATE OF TASK EXECUTION				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Average error rate in completing a task as a percentage (decrease).</i>	There is no baseline data associated with the error rate of rent calculation.	There will not be any change in error rate related to this activity.	There are no outcomes expected related to the error rate.	Meets

CE #5: INCREASE IN AGENCY RENTAL REVENUE				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Rental revenue in dollars (increase).</i>	The expected HCV HAP savings is expected to be \$860,000 at the end of 2021 because of this activity.	The expected HCV HAP savings is expected to be \$860,000 at the end of 2021 because of this activity.	Cost savings are not realized yet.	TBD

SS #1: INCREASE IN HOUSEHOLD INCOME				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Average earned income of households affected by this policy in dollars (increase).</i>	In FY 2017, the average earned income of HCV households was \$25,089.	In FY 2018, the expected average earned income of HCV households will be \$26,000.	In FY 2022 the average earned income for HCV residents was \$10,501; average total annual income was \$18,112. The average earned income of RAD-PBV households in FY 2022 was \$12,889; average total annual income was \$19,576.	No

SS#3: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
1. Employed Full-Time	N/A	N/A	N/A	N/A
2. Employed Part-Time	N/A	N/A	N/A	N/A
3. Enrolled in an Educational Program	In FY 2017, 578 HCV participants where in school or job training program.	In FY 2018, 590 HCV participants will be in school or job training program.	In FY 2022, there were 41 HCV residents enrolled in an education and/or training program; there were 24 RAD-PBV residents enrolled in an education and/or training program as well.	No. Efforts are underway to develop a better method in Yardi to determine educational enrollments.
4. Enrolled in Job Training Program	In FY 2017, 578 HCV participants where in school or job training program.	In FY 2018, 590 HCV participants will be in school or job training program.	In FY 2022, there were 41 HCV residents enrolled in an education and/or training program; there were 24 RAD-PBV residents enrolled in an education and/or training program as well.	No. Efforts are underway to develop a better method in Yardi to determine job training enrollments.
5. Unemployed	In FY 2017, 2,297 HCV participants did not have earned income.	In FY 2018, 2,227 HCV participants will not have earned income.	In FY 2022, there were 744 HCV households that were work-able who did not have any earned income; there were 174 RAD-PBV households who were work-able with no	Yes

			earned income during this time as well.	
6. Other: Employed Part- or Full-Time	In FY 2017, 1,230 HCV participants had earned income.	In FY 2018, 1,300 HCV participants will have earned income.	In FY 2022, there were 1,215 HCV residents who were work-able and had earned income; likewise, there were 395 RAD-PBV residents who were work-able had earned income.	No

SS#4: HOUSEHOLDS REMOVED FROM TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households receiving TANF assistance (decrease).</i>	In FY 2017, 173 HCV households received TANF.	In FY 2018, the expected number of households receiving TANF is 173.	In FY 2022, there were 83 HCV households on TANF and 22 RAD-PBV households on TANF.	Yes; but most likely not due exclusively to this activity.

SS #8: HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>For purposes of collecting this metric only, the FCRHA is defining self-sufficiency as a household that is no longer receiving subsidy (in HCV).</i>	The baseline is zero.	In FY 2018, 0 households are expected to no longer receive HCV subsidies because of this activity.	In FY 2022, there were 39 HCV residents who transferred to self-sufficiency and 6 RAD-PBV residents who transferred to self-sufficiency.	Yes

Annual Reevaluation of Rent Reform Initiative

Outcomes will be measured and reviewed annually and, if necessary, the activity will be revised to mitigate negative impacts.

Hardship Case Criteria

Families impacted by the revised calculation of the family share of rent are subject the FCRHA's Hardship Policy. In FY 2022, there were fewer than 15 hardship requests for this activity.

Actual Non-Significant Changes

There were no non-significant changes regarding this activity.

Actual Changes to Metrics/Data Collection

There were no changes to the metrics or data collection to report for this activity.

Actual Significant Changes

There were no significant changes to this activity.

Challenges to Achieving Benchmarks and Possible Strategies

The FCRHA is closely monitoring households in terms of rent burdened and other signs of economic hardship, particularly as the local housing market has rebound and continues to be very tight in terms of renting. The implementation of the submarket payment standards under Activity 2019-1 will also be critical in helping to encourage housing mobility and reduce the number of households who may be paying more than 45% of their adjusted annual income on rent.

2018A-2 Establish Shared Housing Program in Project-Based Voucher Program

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2014
- Implemented: FY 2014 and FY 2018
- Amended: N/A

Description of Activity

The FCRHA gained approval from HUD in 1987 to administer the Supported Shared Housing Program (SSHP). SSHP is a specialized housing program cooperatively administered by HCD and the Fairfax-Falls Church Community Services Board (CSB). The program is designed to provide long-term affordable housing opportunities to adults with a disability and meet the prescribed level of services established by CSB. The program allows two or more assisted individuals to live together in a single unit.

As the FCRHA converted its Public Housing portfolio to project-based vouchers (PBV) via the RAD program, there was a need for Moving to Work authorization to continue this program. In the PBV program, PHAs are not allowed to pay assistance for “shared housing” units (24 CFR 983.53). Prior to MTW authorization, the tenants in these units were considered one household, with one tenant as the head of household and the other tenant as a member of the household. Their income was combined for the purpose of calculating rent and they had one lease, which was difficult to manage since these participants were not operating as a household.

Under this activity, rents are now calculated using the unit gross rent divided by the number of household members. Since there are no payment standards in the PBV program, the individual gross rent is used for the rent calculation for each person. If the individual’s total tenant payment (TTP) exceeds the individual rent, that person pays their entire pro-rated portion. If the individual’s TTP is less than the pro-rated rent, then the housing assistance payment subsidy makes up that difference, as done in the voucher program.

Update

All persons in shared housing were issued an individual voucher in FY 2022 in preparation of this activity closing at the end of FY 2023.

Impact

This activity continued to be implemented throughout FY 2022.

Activity Metrics

HC #1: ADDITIONAL UNITS OF HOUSING MADE AVAILABLE				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of new housing units made available for households at or below 80% MAI as a result of the activity (increase).</i>	In FY 2018, 22 households receive this benefit.	In FY 2018, the expected number of households receiving this benefit will remain at 22.	38 households received this benefit in FY 2022.	Yes

Actual Non-Significant Changes

There are no non-significant changes regarding this activity.

Actual Significant Changes

There are no significant changes to report regarding this activity.

Actual Changes to Metrics/Data Collection

There are no changes to the metrics or data collection to report for this activity.

Challenges to Achieving Benchmarks and Possible Strategies

There are no challenges expected to achieve the benchmarks related to this activity.

2018A-3 Increase Cap on Maximum Family Contribution to Rent from 40 to 45 Percent

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2018
- Implemented: FY 2019

Description of Activity

This activity allows Housing Choice Voucher Program participants to rent higher-cost units, up to a maximum amount of 45 percent of their adjusted income. This cap only applies to new leases. HUD currently places a cap on initial leases of up to 40 percent of a family’s adjusted income to be paid toward rent and utilities so that households do not pay a disproportionate amount of income on rent. However, because of Fairfax County’s overall high-cost rental market, and specifically high-cost rents in higher opportunity areas, rent and utilities are often more than the FCRHA’s payment standards. This activity allows Housing Choice Voucher Program participants, when entering a new lease with a new landlord, the option to pay more than the proposed 32 to 35 percent of their adjusted income on rent, up to 45 percent. The intent of this activity is to increase housing options to HCV participants.

Update

This activity continued to be implemented in FY 2022.

Impact

The FCRHA will closely monitor the number of households whose share of rent is at 45 percent to ensure that families do not become overly cost burdened. This is critical as the cost of renting in Fairfax County is steadily increasing.

Activity Metrics

HC #5: INCREASE IN RESIDENT MOBILITY				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).</i>	0	It is expected that this increase will allow 25 families increased opportunity.	56 households were paying up to 45% of their adjusted income on rent in FY 2022.	The FCRHA will carefully monitor the number of households over 35% to ensure families to not become overly housing cost burdened.

Actual Non-Significant Changes

There are no non-significant changes to report regarding this activity.

Actual Significant Changes

There are no significant changes to report regarding this activity.

Actual Changes to Metrics/Data Collection

There are no changes to the metrics or data collection to report for this activity.

Challenges to Achieving Benchmarks and Possible Strategies

The FCRHA will continue to closely monitor the number of households whose share of rent is above 35% or 32%. The implementation of the submarket payment standards, via Activity 2019-1, will also be critical to help reduce the number of households who are paying more than 32% or 35% of their adjust income on rent and to increase housing options for families.

2019-1 Establish Fairfax County Payment Standards

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2019
- Implemented: FY 2019

Description of Activity

In November 2016, HUD published a final rule implementing Small Area Fair Market Rents (SAFMR) to promote residential mobility and equity as well as deconcentrate poverty. The Fairfax County Department of Housing and Community Development (HCD) analyzed the potential impact of SAFMRs in Fairfax County and concluded that implementation of SAFMRs as written would have a significant negative financial impact to the program. The FCRHA was approved in its FY 2019 MTW Plan to decouple from the SAFMR and to develop payment standards based on local rental market data.

The activity is being implemented in two phases:

- **Phase 1** included decoupling from the Washington-Arlington-Alexandria, DC-VA-MD U.S. SAFMRs. The FCRHA set a local, countywide payment standard effective March 2019.
- **Phase 2** includes implementing submarket payment standards in Fairfax County that will promote positive residential mobility. This activity is expected to create equitable opportunities for program participants by allowing residential mobility to areas which have higher rents, currently not as affordable with the existing payment standards. This activity is expected to deconcentrate poverty and promote racial equity.

Update

Due to the ongoing COVID-19 pandemic, Phase 2 of this activity was not implemented in FY 2022. Along with the recovering economy, the rental housing market was not stable throughout FY 2022, rendering it difficult to effectively determine submarket payment standards. In addition, administrative changes were minimized as much as possible throughout the year as many of the CARES Act Waivers ended and practices resumed as they did prior to the COVID-19 pandemic. The FCRHA anticipates implementing Phase 2 in FY 2023.

Impact

Further impact of this activity on residential mobility will be monitored once Phase 2 is implemented.

Activity Metrics

CE#1: AGENCY COST SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total cost of task in dollars (decrease).</i>	Average HAP in June 2018 was \$1,160	Phase 1: It is expected that there will be between 0 to 10 percent increase in average cost because of this activity (average HAP will be between \$1,160 to \$1,276) Phase 2: TBD as submarkets are finalized.	The average HAP was \$1,201 in FY 2022. Because this activity is only partially implemented, the outcome is unknown.	TBD

CE#2: STAFF TIME SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total time to complete the task in staff hours (decrease).</i>	It took 0 hours to utilize the HUD-established FMRs/	Establishing the Fairfax County Payment Standard will take approximately 1,040 hours over the next year to complete analysis on and implement Phase 1 and 2.	TBD once Phase 2 is complete.	TBD

CE#5: INCREASE IN AGENCY RENTAL REVENUE				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Rental revenue in dollars (increase).</i>	To implement SAFMRs would have resulted in an increase of \$255 per unit cost.	Phase 1 is expected to increase the per unit cost by no greater than \$116.	TBD once Phase 2 is complete.	TBD

HC#5: INCREASE IN RESIDENT MOBILITY				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).</i>	0—currently opportunity neighborhoods have higher rents than current payment standards.	Under Phase 1, it is expected that 0 households will move to a higher opportunity area. It is expected that 50 families (new and transfers) will move to higher opportunity areas because of Phase 2.	TBD	TBD

Actual Non-Significant Changes

There are no changes to report regarding this activity.

Actual Changes to Metrics/Data Collection

There are no changes to the metrics or data collection to report for this activity.

Actual Significant Changes

There are no significant changes to report regarding this activity.

Challenges to Achieving Benchmarks and Possible Strategies

The FCRHA anticipates the submarket payment standards will have an immediate positive impact on the number of households who are cost burdened, as the Phase 2 payment standards will reflect the nuances of the county’s rental market. To have a positive impact on residential mobility, the FCRHA anticipates utilizing additional strategies to increase the number of landlords participating in the program to increase the supply of housing options. Communications and outreach to households impacted by the change in payment standards will also be critical for an effective launch of the submarket payment standards.

2021-1 Affordable Housing Acquisition and Development

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2021
- Implemented: FY 2021

Description of Activity

This activity allows the FCRHA to commit MTW funds for affordable housing acquisition and development to augment investment tools available when projects are identified. This activity allows the FCRHA to provide an investment commitment for the:

1. Development or redevelopment by the FCRHA of FCRHA- or Fairfax County-owned housing units or land;
2. Development or redevelopment by private developers of FCRHA- or Fairfax County-owned housing units or land; and
3. Development or redevelopment by private developers utilizing FCRHA financing for affordable housing projects.
4. Acquisition of (a) newly built housing units developed by private developers, or (b) existing units owned by private owners for the purpose of housing affordability preservation; to be owned by the FCRHA.
5. Acquisition of land, to be owned by the FCRHA, for affordable housing units that are developed either by the FCRHA or a private developer.

Prioritization of MTW funds will be given to the development and acquisition of housing units in areas which offer high opportunity for residents, as guided by the One Fairfax policy. Use of these funds for a specific commitment requires a thorough financial analysis to ensure sufficient funds and reserves for the ongoing operation of the MTW program. Further, use of these funds will be approved by the FCRHA in each of the projects' financing plans.

Update

In FY 2022, the FCRHA authorized the use of \$10 million from MTW reserves for the development of Dominion Square West, Phase 1 (175 units of affordable housing) and \$7 million for the Little River Glen senior housing project (60 new units and the redevelopment of an existing 120 units). It is anticipated that of the funding authorized in FY 2022, approximately \$17 million in MTW reserves will be committed or expended in FY 2023 for the Little River Glen and Dominion Square projects.

Impact

The utilization of this activity provided critical gap funding for two projects in FY 2022, increasing the overall supply of long-term affordable units in the county.

Activity Metrics

HC #1: ADDITIONAL UNITS OF HOUSING MADE AVAILABLE				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0 as of FY 2021	MTW funds were not committed or expended for this purpose in FY 2022.	N/A for FY 22	N/A for FY 22

HC #2: UNITS OF HOUSING PRESERVED				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	0 as of FY 2021	MTW funds were not committed or expended for this purpose in FY 2022.	N/A for FY 22	N/A for FY 22

HC #5: ADDITIONAL UNITS OF HOUSING MADE AVAILABLE				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 as of FY 2021	MTW funds were not committed or expended for this purpose in FY 2022.	N/A for FY 22	N/A for FY 22

CE #4: INCREASE IN RESOURCES LEVERAGED				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	0 as of FY 2021	MTW funds were not committed or expended for this purpose in FY 2022.	N/A for FY 22	N/A for FY 22

Actual Non-Significant Changes

There are no changes to report regarding this activity.

Actual Changes to Metrics/Data Collection

There are no changes to the metrics or data collection to report for this activity.

Actual Significant Changes

There are no significant changes to report regarding this activity.

Challenges to Achieving Benchmarks and Possible Strategies

There are no challenges expected to achieve the benchmarks related to this activity.

2021-2 Project-Based Vouchers Rental Assistance Demonstration Admissions Policy

Cost Effectiveness
Self-Sufficiency
Increase Housing Choice

Approved/Implemented/Amended

- Approved: FY 2021
- Implemented: FY 2021

Description of Activity

This activity modifies the admission requirement so that new, otherwise eligible RAD-PBV participants are allowed to lease a unit, even if they do not generate a housing assistance payment (HAP). However, the FCRHA is still required to serve 75 percent extremely low-income (below 30 percent AMI) households in the RAD-PBV Program. The tenant’s share of rent for all RAD-PBV participants will continue to be 32 or 35 percent of the household’s income, depending on whether the household is work-able or non work-able, consistent with the FCRHA’s rent calculation policy.

This activity may result in lower future HAP eligibility for leasing to households that do not generate a HAP. However, the FCRHA is committed to this cost trade off to reduce administrative burden and assist a broader spectrum of households. Thus, this activity will be monitored to ensure it is cost neutral to the program.

Update

This activity was amended in FY 2022. RAD-PBV households can now remain leased without generating a HAP until six (6) months after reaching 120% of the household Area Median Income (AMI) level. Households are required to exit the RAD-PBV program and vacate their unit after their income level is at 120% of AMI or higher for six months. Household income levels will be determined at regularly scheduled reexaminations.

Impact

In FY 2022, no households entered the RAD program with zero HAP as allowed by this activity. The FCRHA will continue to monitor the impact of this policy change to determine its benefit.

Activity Metrics

CE #4: INCREASE IN RESOURCES LEVERAGED				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0 as of FY 2021	50 households with zero HAP will now be eligible for a RAD-PBV	0 Households entered the RAD-PBV program in FY22 with zero HAP	No

Actual Non-Significant Changes

There are no changes to report regarding this activity.

Actual Changes to Metrics/Data Collection

There are no changes to the metrics or data collection to report for this activity.

Actual Significant Changes

There are no significant changes to report regarding this activity.

Challenges to Achieving Benchmarks and Possible Strategies

There are no challenges expected to achieve the benchmarks related to this activity.

IV.B. Approved MTW Activities: Not Yet Implemented

2016-1 Use MTW Funds for Local, Non-Traditional Housing Program

Approved/Implemented/Amended

- Approved: FY 2016
- Implemented: N/A

Description of Activity/Impact/Update

Through this activity the FCRHA proposed creating a gateway to federal housing programs for those at the first step of the housing continuum, using the Fairfax County Bridging Affordability (BA) program as the entry point into both the BA program and the housing continuum.

However, in FY 2021, the Bridging Affordability program ended and was replaced with the Rental Subsidy and Services Program (RSSP). The RSSP is a locally funded rental assistance program for Fairfax County residents. The program offers time-limited rental assistance with supportive services - modeled after medium to long-term rapid rehousing programs (6 to 24 months). The goal of RSSP is for households to graduate to market rate housing after nine months of assistance. Participants have household income levels under 50% AMI, but income is not required to participate.

The use of this activity may be explored in the future, although it currently has not been implemented.

Cost Effectiveness

Self-Sufficiency

Increase Housing Choice

IV.C. Approved MTW Activities: Activities on Hold

There are no activities on hold at the close of FY 2022.

IV.D. Approved MTW Activities: Closed Out

2014-4 Streamlined Inspections for Public Housing Residents

Approved/Implemented/Amended

- Approved: FY 2014
- Implemented: N/A
- Closed Out: FY 2018

Like activity 2014-3 Streamlined Inspections for Housing Choice Voucher Units, the FCRHA believed that streamlining its Public Housing inspections would both reduce costs for the agency and provide another tool for families to engage in their own self-sufficiency. However, because the FCRHA was going through a RAD conversion of its Public Housing stock, this activity was never implemented.

2014-7 Convert Scattered-Site Public Housing Units to Project-Based Section 8 Assistance

Approved/Implemented/Amended

- Approved: FY 2014
- Implemented: N/A
- Closed Out: FY 2018

The FCRHA applied for the RAD program and successfully converted all Public Housing stock to long-term Section 8 rental assistance contracts in FY 2018. Therefore, this activity is closed out.

2014-8 Allow Implementation of Reduced Payment Standards at Next Annual Reexamination

Approved/Implemented/Amended

- Approved: FY 2014
- Implemented: N/A
- Closed Out: FY 2021

This activity was initially placed on hold due to the combined potential financial impact that other implemented activities could have on families. In particular, Activity 2014-9 and Activity 2018A-1 increased the family share of rent to 35 percent for work-able households and to 32 percent for non work-able households. With the implementation of these two activities, households began to assume a greater share of rent. A reduction in payment standards, combined with increases in family share of rent, could have resulted in more families being rent burdened. As this activity was never implemented, it is being closed out.

2015-1 Eliminate Flat Rents in the Public Housing Program

Approved/Implemented/Amended

- Approved: FY 2015
- Implemented: FY 2015
- Closed Out: FY 2018

In an amended FY 2015 Moving to Work Plan, the FCRHA proposed to eliminate the flat rent option so that all families currently paying flat rent would be required to pay 35 percent of their adjusted income at their next annual recertification. HUD approved this activity in late 2015 and the FCRHA began implementation of this policy after the amended plan was approved. The FCRHA sent letters to all affected families notifying them that a new rent calculation based on 35 percent of their adjusted income would become effective at their next annual recertification. They were given at least a 90-day notice. Families whose recertification fell less than 90 days from notification received the new rent calculation at their second annual recertification.

Because the FCRHA converted its Public Housing to the RAD Project-Based Vouchers, this activity was closed.

2017-2 Establish Gateway to Housing Choice Voucher Program from the Tenant-Based Rental Assistance Program

Approved/Implemented/Amended

- Approved: FY 2017
- Implemented: N/A
- Closed Out: FY 2021

The FCRHA has over 50 TBRA vouchers which provide housing assistance to formerly homeless households, non-elderly disabled households, and families that are not able to be served because of a reasonable accommodation or some other reason. TBRA is funded through the Federal HOME Investments Partnership Program. In the past, the FCRHA was concerned that funding would be reduced or eliminated for this program during Federal budget cycles. The original intent of this activity was to establish a gateway between the TBRA program and HCV. Thus, if it were ever necessary to decrease the number of TBRA households funded through HOME, the gateway would be established through a preference for priority on the HCV waiting list to ensure that these families continued to receive affordable housing assistance.

Because HOME has continued to be funded at a level that has allowed the FCRHA to continue the TBRA program, this activity was never implemented and was closed.

V. Sources and Uses of Funds

A. Sources and Uses of MTW Funds

Section V (A). Sources and Uses of MTW Funds
i. Available MTW Funds in the Plan Year
The FCRHA submitted unaudited and audited FY 2022 information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System (FASPHA).
ii. Expenditures of MTW Funds in the Plan Year
The FCRHA submitted unaudited and audited information in the prescribed FDS format through the FASPHA.
iii. Application of MTW Funding Flexibility
<p>The FCRHA used MTW single fund flexibility to implement and operate programs for HCV and RAD-PBV program participants.</p> <p>In FY 2022, there were several expenditures that utilized MTW Single Fund Flexibility: 1) enhancements to Yardi to improve data collection and dissemination efforts; 2) support for a contract with Cornerstones, a local non-profit organization, to provide the provision of basic needs resources, case management services, and skill building activities to FCRHA households in Reston, VA; 3) contract with a non-profit organization, Northern Virginia Family Service, to provide referral-based case management services to HCV households including behavioral health consultation services and assistance with benefits navigation; 4) the continued implementation of the rent reform controlled study, including utilizing a “work stabilization” deduction to encourage families to work and a contract with Virginia Tech for the evaluation of the study; and 5) support for staff positions who assist HCV households. In addition, funding was set aside in FY 2022 to provide organizational/clean-out services to assist households with hoarding disorders. Due to the ongoing pandemic and a switch to utilizing third-party management companies for all RAD-PBV units, the FCRHA was unable to provide these services but plans to do so in FY 2023 and will utilize MTW single fund flexibility at that point.</p>

B. Local Asset Management Plan

Section V (B). Local Asset Management Plan	
i. Did the MTW PHA allocate costs within statute in the Plan Year?	Yes
ii. Did the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?	No
iii. Did the MTW PHA provide a LAMP in the appendix?	No
iv. If the MTW PHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that the MTW PHA did not make any changes in the Plan Year.	
N/A	

VI. Administrative

HUD Reviews, Audits or Physical Inspection Issues

No issues that require the agency to act have been cited in HUD reviews, audits, or physical inspections.

Update on PHA Directed Evaluations

The FCRHA completed the evaluation of the rent reform controlled study in FY 2022. RAD-PBV participants were actively engaged in the evaluation, including control and study groups. Virginia Tech conducted the evaluation and ensured that data was collected, cleaned, and provided in a timely manner for the evaluation. The COVID-19 pandemic most likely impacted the evaluation, making it difficult to determine the true impact of policy changes on the employment status of study participants. The full report from the rent reform controlled study is included in the Appendix.

Certification That the PHA Has Met the Three Statutory Requirements

The Fairfax County Redevelopment and Housing Authority certifies that it has met the three statutory requirements of:

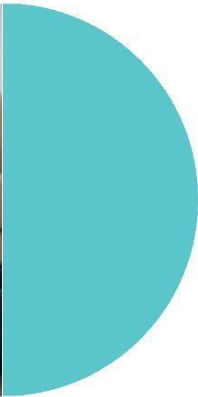
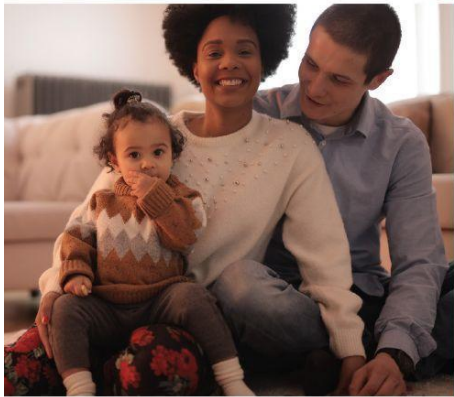
1. Assuring that at least 75 percent of the families assisted by the Agency are very low-income families;
2. Continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and
3. Maintaining a comparable mix of families (by family size) that are served, as would have been provided had the amounts not been used under the demonstration.

MTW Energy Performance Contract Flexibility Data

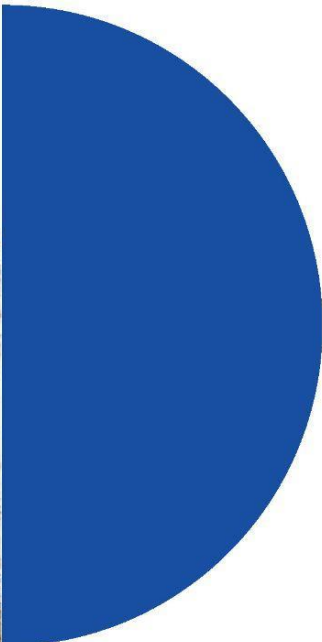
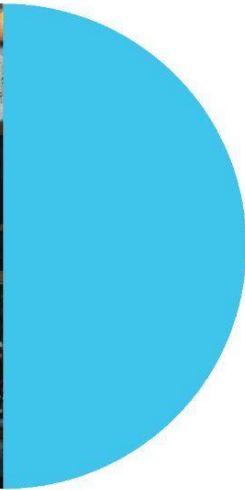
N/A

Appendix A

The following is the final report from the Moving to Work Rent Reform Evaluation, written by the Virginia Tech School of Public and International Affairs. The report was completed at the end of Fiscal Year 2022.



Moving to Work (MTW) Rent Reform Evaluation



Fairfax County
Redevelopment and
Housing Authority (FCRHA)

June 2022



SCHOOL OF PUBLIC AND
INTERNATIONAL AFFAIRS
VIRGINIA TECH.



Fairfax County Redevelopment and Housing Authority
Moving To Work Rent Reform Evaluation
June 2022

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Evaluation Conducted by Virginia Tech

Thomas W. Sanchez (PI), Professor, School of Public and International Affairs

Lara Nagle, Research Associate, Institute for Policy and Governance

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Executive Summary

Moving to Work (MTW) is a demonstration program for public housing authorities (PHAs) that provides the opportunity to design and test innovative, locally-designed strategies that use federal dollars more efficiently, help residents find employment to become self-sufficient, and increase housing choices for low-income families. The Fairfax County Redevelopment and Housing Authority (FCRHA) became a MTW agency in November of 2013.

From 2018 to 2022, the FCRHA conducted an evaluation of its MTW Rent Reform pilot in partnership with Virginia Tech. The Rent Reform evaluation randomly selected work-able households from the Rental Assistance Demonstration – Project Based Voucher (RAD-PBV) properties to participate in a control and study group. The study group was provided with a work stabilization incentive of a 20% deduction on earned income from the total tenant payment (TTP) calculation. The recertification period was also changed from annually to every two years for all MTW work-able households, not only for those participating in the rent reform study. During the onset of the pandemic, additional COVID-19 policies were put into place. Once all participating households were recertified to begin the study, quarterly reports from March 2020-2022 tracked average changes to monthly earned income, assets, and TTP, as well as the reported impact of the work stabilization deduction for study households, and COVID-19 for all households.

From the administrative data analysis, the research team could not conclude that the work stabilization deduction had a positive impact on the study households, primarily in light of the fact that the control households saw greater increases in average monthly earned income and assets over the course of the study period. The demographic differences between the study and control group households did not appear to be significant enough to fully explain why the control group fared relatively better. The overall gains for either group over the study period on average did not substantially lift households out of the extremely low-income category, though some households did move to Housing Choice Voucher (HCV) housing during the study and some younger, work-able members moved out of the household due to increased financial independence.

This lack of appreciable gains may point to broader factors, such as unemployment during COVID-19 and the ripple effects of that, having a unique impact on households' ability to increase their self-sufficiency during the study period. The research team found that a majority of both study and control groups were female, approximately 75% of the total cohort was non-white and did not speak English as a primary language, and the study group, in particular, had 20% more households with dependent children. While it was not known to the research team what types of jobs work-able members were working or their level of education and English proficiency, it is possible that a significant percentage of work-able participants were negatively affected by COVID-19 trends, including high unemployment rates by sector and/or gender-related differences in employment and childcare responsibilities during COVID-19.

Limitations to the evaluation included challenges during the recruitment process affecting the sample size, a lack of qualitative context to explain changes in the administrative data, and YARDI data collection and analysis complications. Additional mixed-methods evaluation of the work stabilization deduction, tracking an expanded list of metrics, is recommended.

1. Introduction

Moving to Work (MTW) is a demonstration program for public housing authorities (PHAs) that provides the opportunity to design and test innovative, locally-designed strategies that use federal dollars more efficiently, help residents find employment to become self-sufficient, and increase housing choices for low-income families. MTW gives PHAs exemptions from many existing public housing and voucher rules and more flexibility regarding how they use their federal funds. MTW PHAs are expected to use the opportunities presented by MTW to inform the U.S. Department of Housing and Urban Development (HUD) about ways to better address local community needs.

The Fairfax County Redevelopment and Housing Authority (FCRHA) became a MTW agency in November of 2013. The FCRHA's core MTW objectives encourage self-sufficiency and assure accurate reporting of income, leveraging local and federal resources to serve the same or a larger number of families while achieving greater cost effectiveness in the use of federal resources and increasing housing choice for eligible low-income families. The FCRHA instituted a Rent Reform pilot as part of its MTW agreement with HUD. The FCRHA's MTW activities have included strategies focused on Cost Effectiveness, Self-Sufficiency, and Increasing Housing Choice through activities such as Rent Reform; Reduction in Frequency of Reexaminations; Eliminating Flat Rents in the Public Housing Program; Authorization to Establish a Local Moving to Work Project-Based Voucher (PBV) Program, etc.

From 2018 to 2022, the FCRHA conducted an evaluation of the Rent Reform program in partnership with Virginia Tech.¹ The Rent Reform evaluation randomly selected work-able households from the RAD PBV program to participate in a control and study group. The study group was provided with a work stabilization incentive of a 20% deduction on earned income from the total tenant payment (TTP) calculation. Senior and disabled heads of households were excluded from the study and a hardship exemption was available for those unable to meet the program policies. The control group did not receive the work stabilization deduction, however, received quarterly petty cash incentives to remain in the study for comparison purposes.

Primarily, the evaluation has sought to identify if the work stabilization deduction changed employment behavior in the study households: Did household members work more? Did their income increase? Did more members of the household engage in work-related activity, such as job training? The FCRHA expected the following outcomes over the course of the study period:

- There would be an increase in the average household income;
- There would be an increase in average household savings;
- Fewer households would remain on Temporary Assistance for Needy Families (TANF);
- All households in the study experiment group would be assisted with services aimed at increasing self-sufficiency; and
- There would be a reduction in the average unit subsidy of households in the study group.

Households involved in the evaluation were subject to several FCRHA policies over the period of the study (Table 1). The FCRHA adopted interim measures in response to COVID-19 beginning in April 2020 including CARES Act Waivers, which impacted voucher households, inspection and recertification

¹ Though the evaluation has been completed, the work stabilization deduction will continue through FY2024.

requirements,² as well as adding a technical amendment to the MTW plan reducing in-person interactions.

Table 1. FCRHA MTW Rent Reform Policy Changes by Study and Control Group

Policy	Rent Reform Study Group	Rent Reform Control Group
Rent Reform	<ul style="list-style-type: none"> • 20 percent work stabilization deduction from TTP 	<ul style="list-style-type: none"> • Quarterly stipends • Completion bonus
Calculation of Rent	<ul style="list-style-type: none"> • 35% TTP • \$220 minimum rent 	
Re-examination Frequency	<ul style="list-style-type: none"> • Every 2 years 	
Interim Policy	<ul style="list-style-type: none"> • Increases in income between biennial reexaminations are disregarded until the next scheduled reexamination. • A reported decrease in income is limited to one during a calendar year. 	
COVID-19 Policy (ended 12/31/21)	<ul style="list-style-type: none"> • Households were required to report all changes in income, however TTP was only recalculated when income levels decreased, unless the family went down to zero income. In this scenario, households who had zero income and then gained income had to report the increase, and their TTP was recalculated. • Households could report loss of income more than once per year. 	

2. Literature Summary

The following section provides a brief overview of MTW initiatives and evaluations that have been documented in the literature. A more detailed review of the literature, including background about MTW, methods to evaluate changes over time, and reported outcomes from several MTW studies and programs, is provided in Appendix A.

The Moving to Work (MTW) demonstration program was legislated in 1996 and implemented in 1999 to allow public housing authorities (PHAs) and the U.S. Dept. of Housing and Urban Development (HUD) greater flexibility to design and test programs that achieve cost effectiveness, provide innovative incentives for working families, and increase housing choice for low-income families (Cadik & Nogic, 2010). Only Congress may authorize additional slots to accept new participants in coordination with HUD. The Fairfax County Redevelopment and Housing Authority was one of four PHAs added to the program in 2012, pursuant to PIH Notice 2012-16 (MTW FAQ, n.d.). In 2019, when this study began, 39

² FCRHA. (2020). Addendum for COVID-19 Response.

<https://www.fairfaxcounty.gov/housing/sites/housing/files/assets/images/news/hud%20covid-19%20waivers.pdf>

PHAs were participating in the MTW program. To date, there are now 109 MTW PHAs nationwide and HUD plans to expand the program to include an additional 30 PHAs by this year (HUD, 2022).

Critics of HUD's traditional rent structure, where households contribute 30% of their adjusted income towards rent and utilities, have noted this creates a disincentive to work; "[b]ecause voucher holders pay 30 percent of their income (after certain exclusions and deductions) toward their rent and utilities, their subsidies fall as their incomes rise, creating an implicit marginal 'tax' on increased earnings" (Riccio et al., 2019, p. ES-1). This traditional policy also imposes an administrative burden on the PHAs that must adjust the subsidy as incomes rise and fall, and apply complicated rules to calculate the subsidy. With calls for increased funding and capacity for the HCV program as a Federal reform to strengthen housing stability, affordability, and choice (Reynolds et al., 2021), it is imperative to identify methods to administer rent more efficiently and in a way that incentivizes families to become self-sufficient.

Rent reform designs attempting to do this may reduce recertification frequency, set term limits, change the way total tenant payment is calculated, eliminate or simplify the earned income deduction, change how assets are characterized as income for the purposes of calculating rent payments, implement a standard deduction, or combine a variety of other policy changes (Cadik & Nogic, 2010, p. 6, 40). MTW agencies are required to evaluate the effectiveness of their designs, and report baselines, benchmarks, and data collection methods to measure the progress of the program in meeting the three MTW statutory objectives: cost savings, self-sufficiency, and housing choices (MTW FAQ, n.d.).

In a randomized controlled study of four PHAs, including the Lexington-Fayette Urban County Housing Authority, Louisville Metropolitan Housing Authority, San Antonio Housing Authority, and the District of Columbia Housing Authority, interim results of a rent reform program were reported, beginning in 2015 involving a 3-year recertification schedule, a new formula for calculating the family's total tenant payment (TTP) and subsidy, and safeguards for families (Riccio et al., 2019). The study found mostly similar, short-term results across the four locations, including (pp. ES-5-12):

- "The new rent policy did not improve labor market outcomes for household heads with all four locations combined.
- The new rent rules produced positive impacts on labor market outcomes in Lexington and San Antonio but not in Louisville or Washington, D.C.
- A modest minimum TTP may not affect household heads' employment or earnings.
- Triennial recertifications may have a positive effect on household heads' earnings independent of the minimum TTP.
- So far, impacts on household heads' earnings have had few spillover effects on families' receipt of TANF or SNAP benefits.
- The new rent rules modestly increased the likelihood that families would still be receiving housing subsidies by the end of the 30-month follow-up period.
- On average, families in the new rent rules group paid somewhat less toward their housing costs while in the voucher program compared with the existing rules group.
- Compared with the control group, families in the new rent rules group received more in total rental subsidies, an expected short-term result of the policy changes.
- A growing proportion of families used the new rent policy's hardship remedies.
- The new rent policy has not affected the likelihood of household heads using special housing or services for the homeless.
- The new rent policy substantially reduced the likelihood of PHA actions (with or on behalf of families) as families' circumstances changed.

- The process of calculating retrospective income in setting families’ TTPs under the new rent policy was often burdensome for staff.
- Families in the new rent rules group appreciated the switch to triennial recertifications.
- The new rent policy appears, so far, to cost no more to administer than the existing policy, and probably costs less.”

3. Evaluation Process and Methods

As shown in the project and evaluation timeline (Fig. 1), the evaluation began in November 2018, including conducting the literature review, finalizing the Institutional Review Board (IRB) protocol and approvals, and establishing the randomly-assigned, study-and-control group sample with comparison households matched based on household size and the number of work-able members. Upon discussion with the FCRHA and the Virginia Tech Human Research Protection Program, it was determined that informed consent should be used by the FCRHA to engage participants in either the study or control group. A case manager with more than a decade of experience as a housing services specialist for voucher and public housing programs was hired in April 2019 to communicate with participating clients for the duration of the study. The case manager did not facilitate access to other social services in a formal way as occurs through the FCRHA’s Family Self-Sufficiency program, however, the case manager provided informal guidance as needed during recertifications. Some household members, particularly older heads of households, did access services through community partners and other organizations during the study.

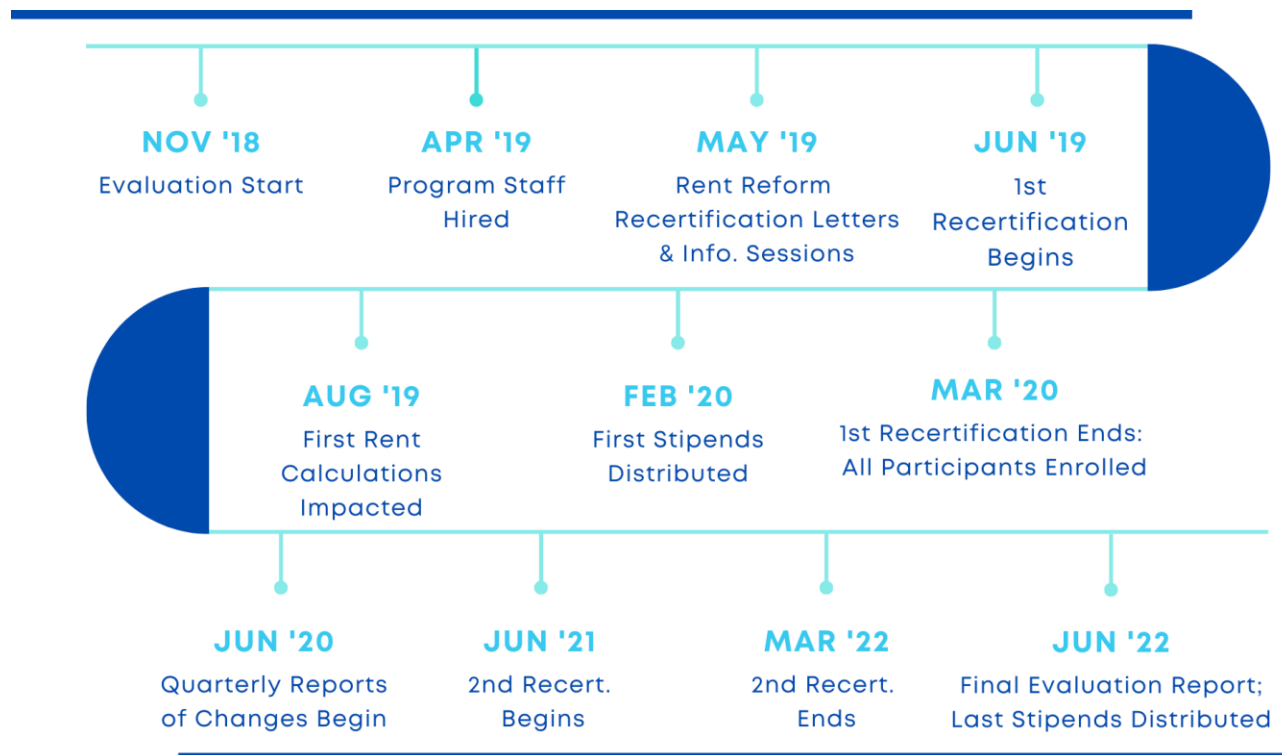


Figure 1. Project and Evaluation Timeline

Beginning May 2019, the FCRHA hosted rent reform informational sessions and sent out mailings, and enrolled participants in the study through the initial recertification process, which began in June 2019 and ended in March 2020. The case manager provided a pamphlet explaining the logistics of the work stabilization deduction and answered any additional questions as participants were enrolled in the

study. From that point, quarterly reports were provided to the FCRHA noting average changes in monthly earned income, assets, and total tenant payment (TTP) between the study and control groups using data from March 2020 to 2022. Also during this time period, a second round of annual recertifications was conducted (June 2021-March 2022) and stipends were distributed to the control households through the final quarters (Table 2).

Table 2. Quarterly Stipends Distributed to Control Group Households

Quarter	Amount
1 - March – June, 2020	\$ 30.00
2 – June – Sept, 2020	\$ 35.00
3 – Sept – Dec, 2020	\$ 40.00
4 – Dec – March, 2021	\$ 45.00
5 – March – June, 2021	\$ 50.00
6 – June – Sept, 2021	\$ 55.00
7 - Sept – Dec, 2021	\$ 60.00
8 - Dec – March, 2022	\$ 75.00
Completion Bonus	\$ 60.00
Total	\$ 450.00

This final report reflects findings from the analysis of quarterly administrative data over the last two years (March 2020-March 2022), with case management notes providing some additional context regarding any changes in income or employment, as well as a close-out interview with the FCRHA staff conducted in February 2022.

Both the study and control groups included households living in Rental Assistance Demonstration – Project Based Voucher (RAD-PBV) properties. The RAD program generally serves households with incomes up to 50% of median income and income limits vary by household size.³ Once in the program, the TTP is based on the household’s income and ability to pay a minimum rent. “Per MTW Activity 2014-9, the FCRHA has reformed the calculation used to determine the family’s share of rent and utilities, by increasing the percent of the family’s monthly adjusted income from 30% to 35%. Therefore, for MTW participants, TTP is calculated as the highest of the following amounts, rounded to the nearest dollar:

- 35% of the family’s monthly adjusted income (adjusted income is defined in Part II)

³ Fairfax County Housing and Community Development. (n.d.). Rental Assistance Demonstration (RAD) Project-Based Voucher Program (formally known as Public Housing). <https://www.fairfaxcounty.gov/housing/rentalhousing/rad>

- 10% of the family’s monthly gross income (annual income, as defined in Part I, divided by 12)
- A minimum rent amount of \$50 and \$220 as established by the FCRHA for non-workable and Work Able families, respectively” (FCRHA, 2021, p. 6-34).

A full description of income, asset, and subsidy determinations can be found in Chapter 6 of the FCRHA’s Housing Choice Voucher Administrative Plan.⁴

The same MTW policies were applied to all households regardless of grouping with two exceptions: 1) study group households received a deduction of 20% of gross earned income which reduced the TTP (Table 3); and 2) control group households received a quarterly stipend and a completion bonus (as noted above in Table 2). All households had access to the County’s Department of Housing and Community Development PROGRESS Center, which focuses on interventions to prevent and address crises as well as collaborations with other human services agencies to coordinate services.

Table 3. Sample Calculation of TTP for a Study Group Household⁵

Work Stabilization Incentive	Gross Earned Income	Other Income (e.g. child support)	Gross Household Income	Annual TTP (35%)	Monthly TTP
Before 20% Deduction is Applied	\$18,642	\$9,492	\$28,134	\$9,846.90	\$821
After 20% Deduction is Applied	\$14,914	\$9,492	\$24,406	\$8,542.10	\$712

The final sample size for the duration of the study was 51 study households (n=152 household members) and 37 control households (n=105 household members). The research team and the FCRHA case manager made significant efforts to achieve the proposed sample size of 150 households per group, but can only speculate why it was particularly challenging to achieve this target sample. The small sample size limited the significance of the findings and the ability to conduct difference-in-differences analysis using matched study-control households (see Appendix A for more information about this method of analysis).

Participating households in the evaluation reported changes in writing as they arose, but formal changes reflecting increases in income occurred at the biennial recertification appointments, which were facilitated by the FCRHA case manager. Administrative data were collected using Form HUD-50058, Family Report, in the YARDI database for each household member, including demographic information (race, age, gender, language, household size, number of children, household member type, disability and senior status), as well as work-able status, childcare and medical care adjustments.

⁴ FCRHA. (2021, January). Administrative Plan for the Housing Choice Voucher Program. https://www.fairfaxcounty.gov/housing/sites/housing/files/assets/documents/hcv/admin%20plan/fcrha_hcv_admin_plan.pdf

⁵ This example was used by the FCRHA to explain the calculation of TTP in materials presented to the study group households in 2019.

The main variables tracked for the study were average changes in monthly household earned income, previous and current TTP, and total assets from quarter to quarter beginning March-June 2020 and ending December-March 2022 (8 total quarters of data). Individual level data for each of the three financial variables were aggregated for each household using the Head of Household (HOH) Code identifier. The analysis provides the average change by quarter and average change over the project duration for the two participant groups. The case manager also asked participants who experienced changes to income or employment if they were impacted by COVID-19, and/or motivated by the work stabilization deduction (the latter question is relevant for study households only).

4. Results

The results below include descriptive statistics comparing the study and control groups, average changes to monthly earned income, assets, and TTP, and an exploration of demographic and other factors that provide additional context regarding the average changes over time.

Demographic Snapshot of Study and Control Households

The following demographic descriptive statistics were pulled using point-in-time data from the quarter December 2020 to March 2021, approximately halfway through the study period and representative of the cohort.

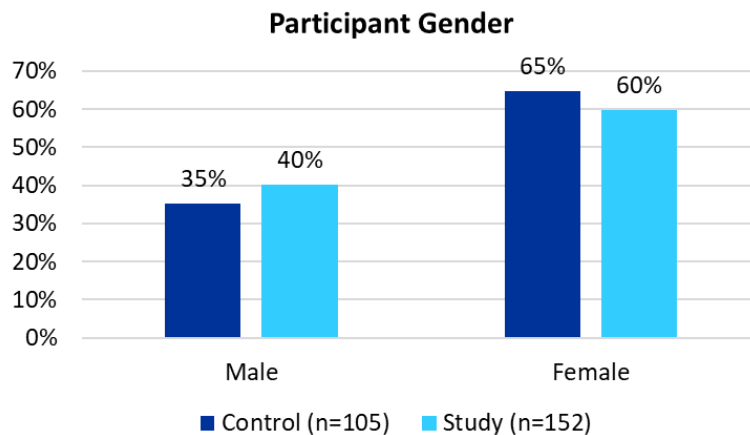


Figure 2. Participant Gender

Participant gender did not differ significantly between the control and study households, with a larger percentage of women than men in both groups (Fig. 2).

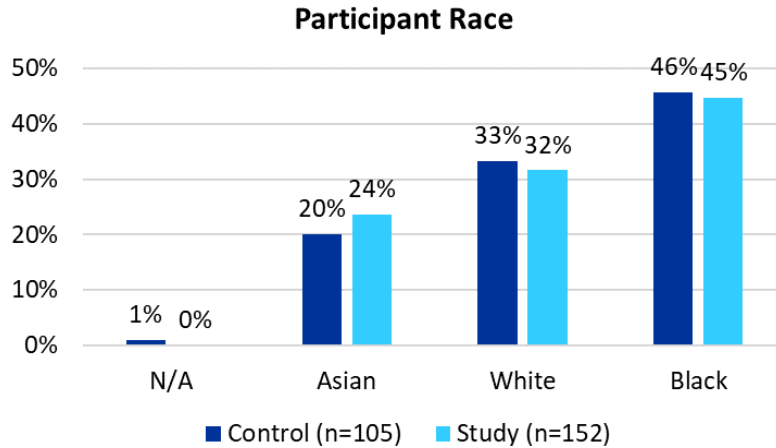


Figure 3. Participant Race

Nearly half of the participants in both the control and study groups were Black, followed by a third white, and roughly a quarter Asian (Fig. 3). These racial categories were not further broken down in YARDI according to ethnicity or racial subcategory.

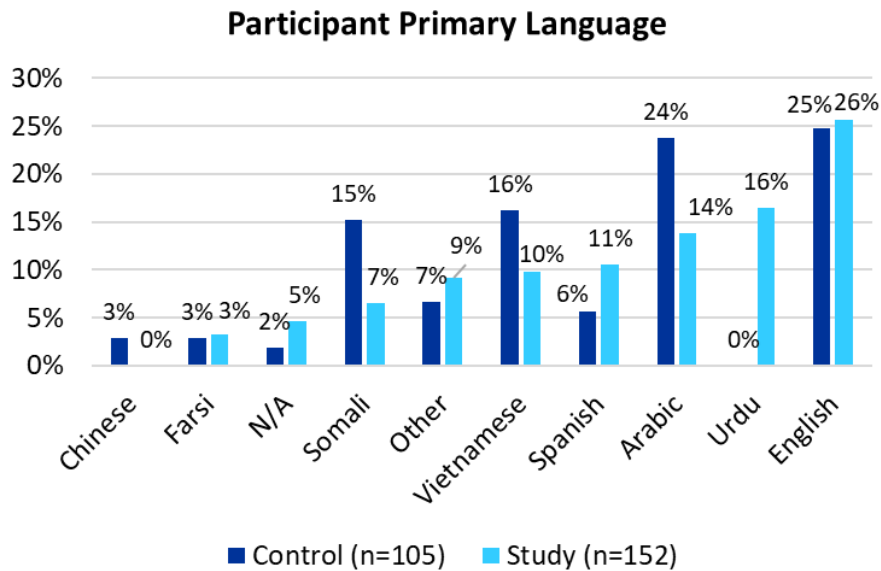


Figure 4. Participant Primary Language

The primary language spoken by participants did vary slightly by study and control group (Fig. 4). Notably, the percentage of Somali language speakers in the control group was twice that of the study group, whereas the control group had no Urdu language speakers compared to 16% in the study group. There were also higher percentages of Arabic, Vietnamese, and Chinese speakers in the control group, whereas the study group had more Spanish speakers. A quarter of household members from both groups spoke English as their primary language, and both groups had a small percentage of Farsi language speakers (3%).

Participant Age Distribution

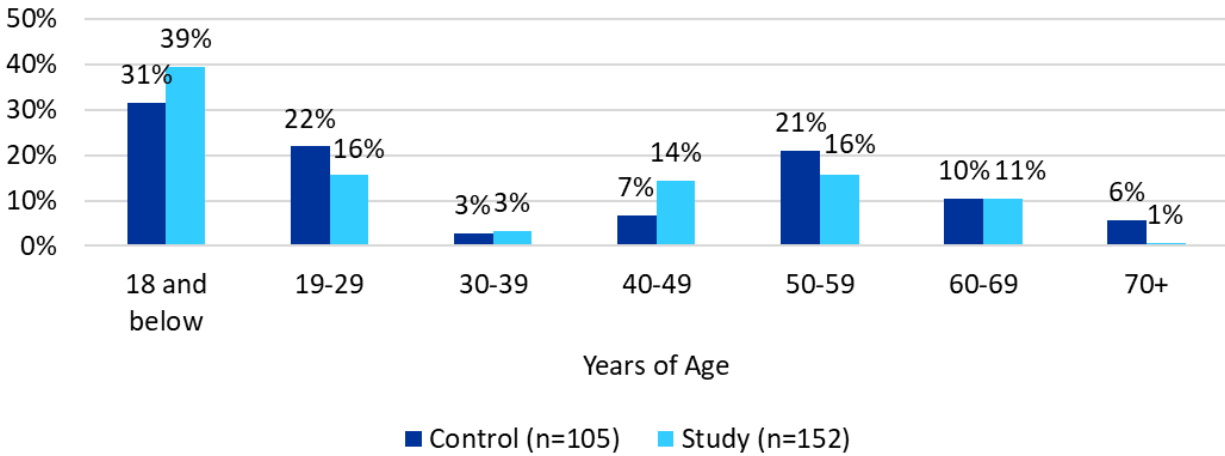


Figure 5. Participant Age Distribution

Across the study and control households, household member ages ranged from zero to 86 years old (Fig. 5). While it is difficult to discern relevant differences between the distribution of ages in either the study or control group, overall there appears to be a mild bimodal pattern, with a larger percentage of younger (ages 0-25) and older (ages 45-65) household members, and fewer in between (ages 30-40). This pattern is slightly more pronounced in the control group. In terms of elderly status, 9% of the control group household members (n=105) were elderly, compared with 5% of the study group (n=152). In terms of disability status, 2% of the control group household members (n=105) had a disability compared with 4% of the study group (n=152). While the pilot did not enroll disabled or elderly heads of households, it is worth noting that some of the households included members of these more vulnerable populations.

Household Size

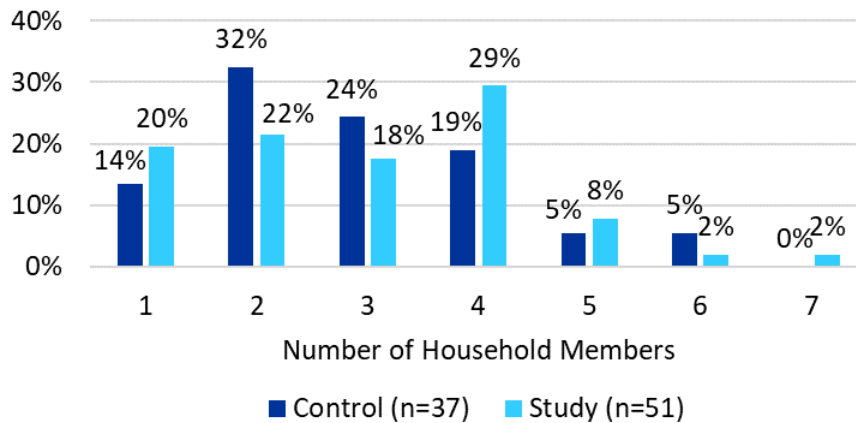


Figure 6. Household Size (Number of Household Members)

The majority of study and control households had four or fewer members (Fig. 6) and many had no children under 18 years of age (Fig. 7). About 20% of control and study households had one child, with some differences between households with two and three children by study or control group. Overall,

38% of the control group households had children compared with 58% of the study group households. In other words, approximately 20% more study households had children.

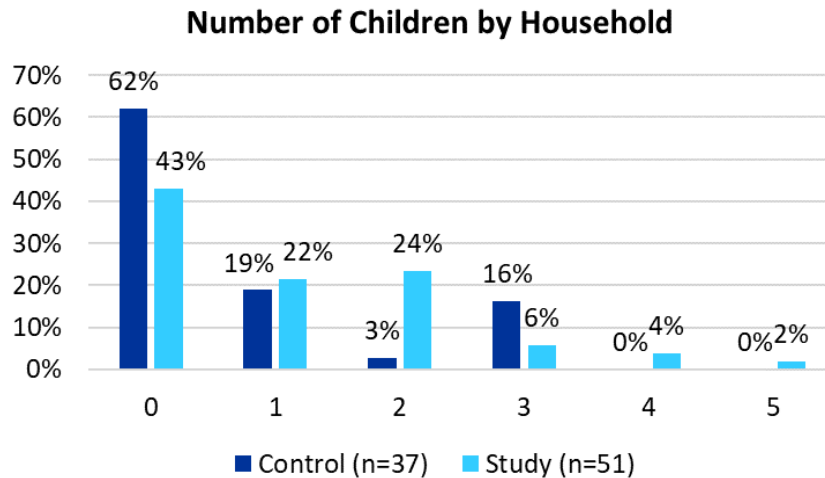


Figure 7. Number of Children by Household

Employment Status and Changes to Earned Income, Assets, and TTP

The percentage of work-able household members did not differ significantly between the study group (n=83, 55%) and the control group (n=60, 57%). In Fig. 8, the employment status of work-able household members indicates that the largest proportion of both study and control participants were earning wages, with a small percentage of people earning wages from their own business. Twelve to 15% of participants received unemployment benefits across both groups.

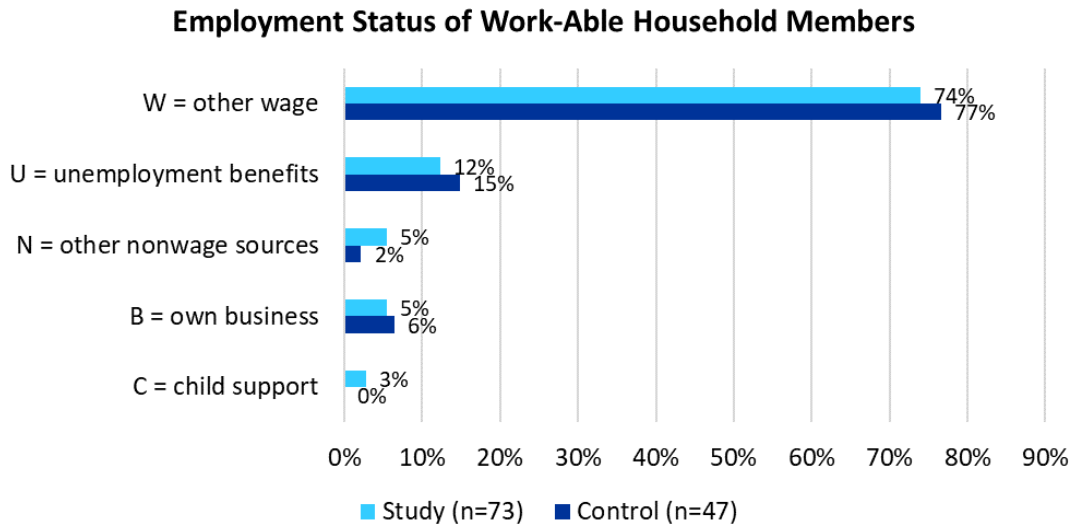


Figure 8. Employment Status of Work-Able Household Members

In quarters with noticeable changes to average household monthly earned income, the control group households consistently experienced larger average changes than the study group (Fig. 9), and experienced no negative average change in contrast to the study group. The range of monthly

household earned income across all quarters was \$0-\$5,001 for the control group, and \$0-\$7,291 for the study group.

Average Change in Monthly Household Earned Income by Quarter

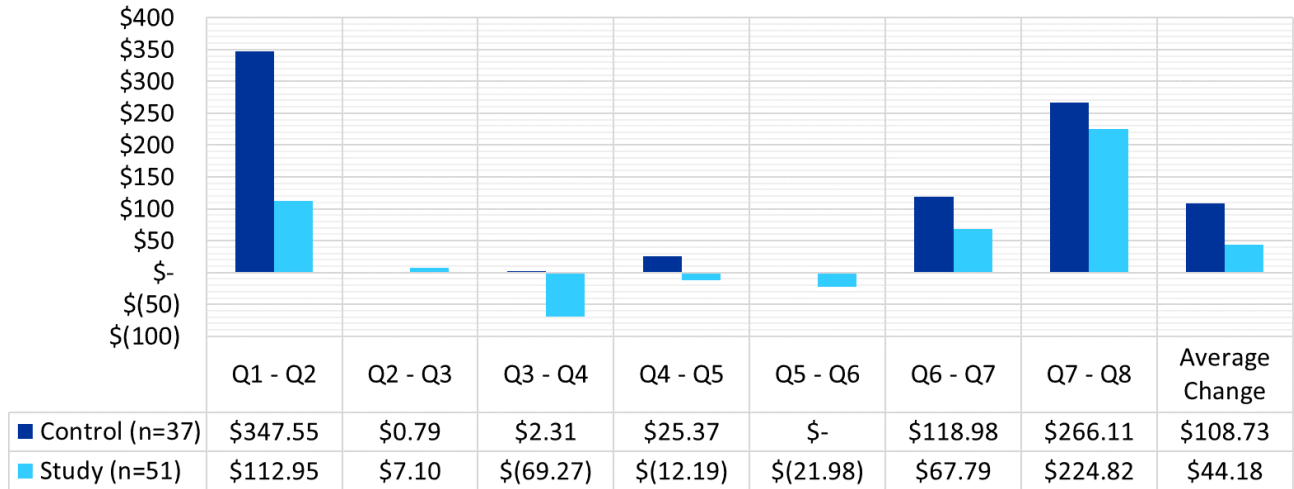


Figure 9. Average Change in Monthly Household Earned Income by Quarter

Similarly, the control group households experienced greater overall gains in household assets over the course of the study period, most notably at the beginning and end of the study period, which could be related to the recertification cycle and formal updates to the data in YARDI (Fig. 10). The range of household assets across all quarters was \$7-\$190,093 for the control group, and \$0-\$24,984 for the study group. Only four households in the control group had assets over \$50,000, and of those, only two households had assets over \$100,000 during the course of the study period.

Average Change in Household Assets by Quarter

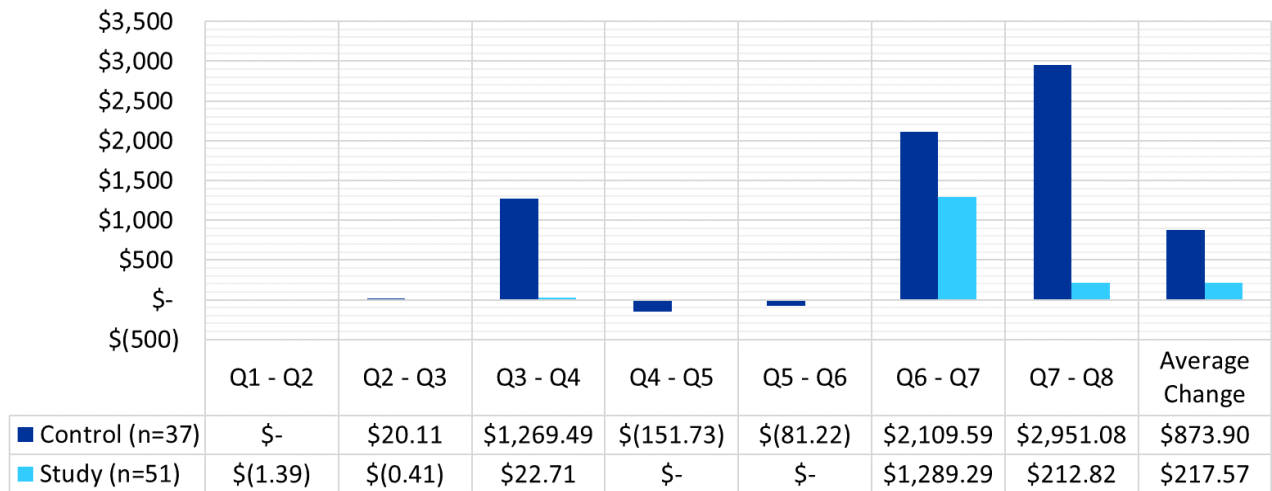


Figure 10. Average Change in Household Assets by Quarter

For the most part, the average change in household total tenant payment (TTP) follows the pattern of average monthly earned income due to how TTP is calculated (Fig. 11), however, there were likely some deferred TTP adjustments due to the policies outlined in Table 1. The range of household TTP across all quarters was \$0-\$3,021 for the control group, and \$0-\$2,792 for the study group.

Average Change in Household TTP by Quarter

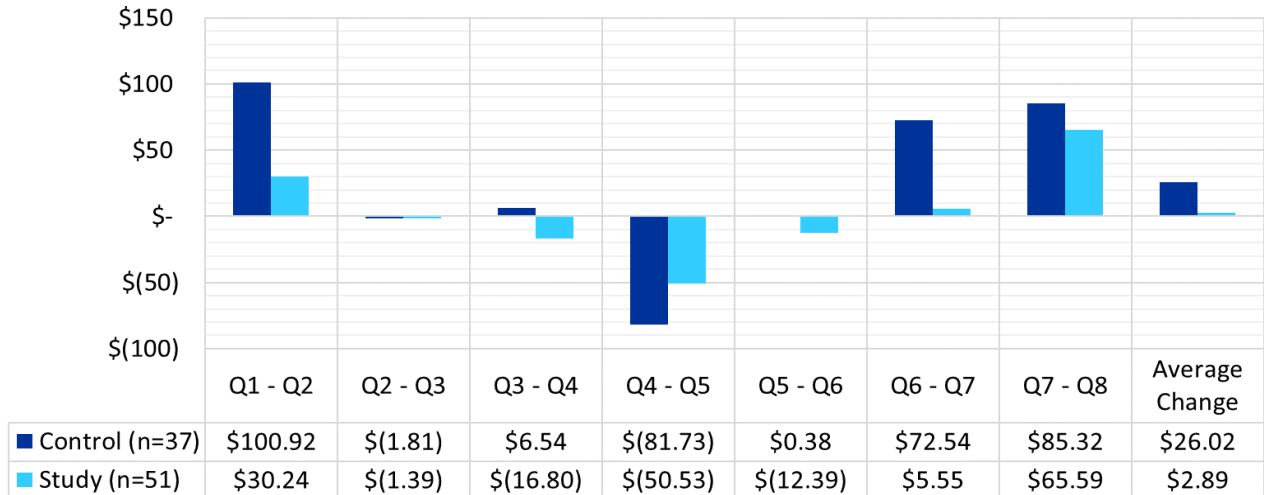


Figure 11. Average Change in Household TTP by Quarter

Examining the differences between the study and control groups by quarter across the three financial metrics, the study group experienced less growth in earned income and assets in comparison to the control group, on average (Fig. 12). The larger discrepancy occurred between study versus control group assets, with an average of \$656 in fewer assets among the study group households over the course of the study.

Difference in Study vs. Control (Study Average - Control Average)

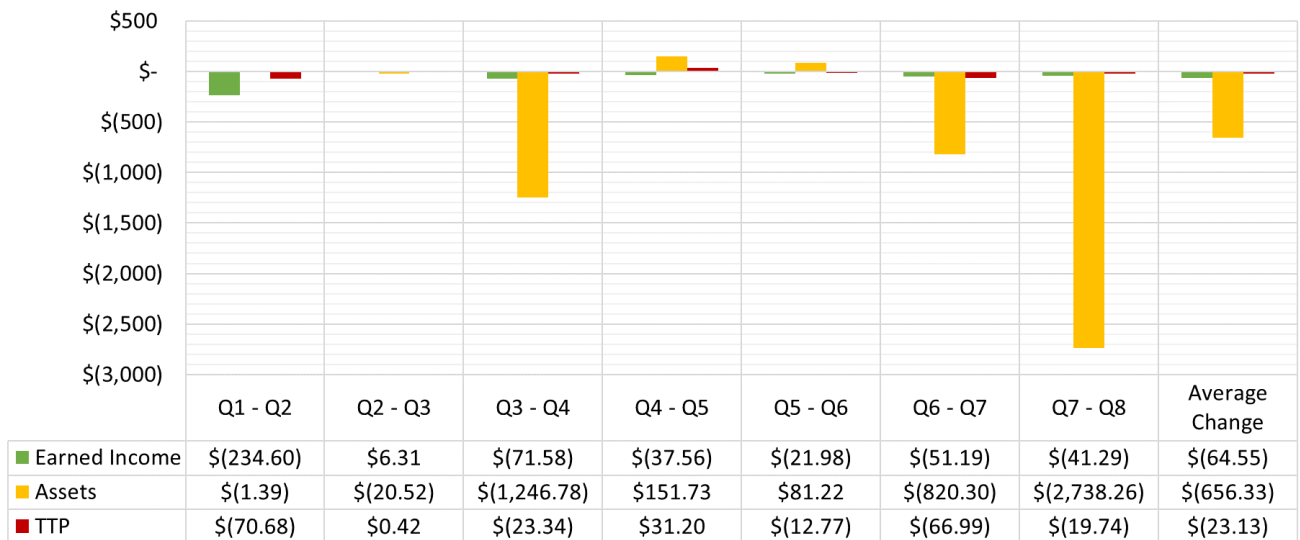


Figure 12. Difference in Study vs. Control by Quarter for Monthly Earned Income, Assets, and TTP

Put another way, in terms of absolute average changes for either group, the control group experienced higher increases in monthly earned income and assets (Table 4).

Table 4. Overall Average Changes for Control vs. Study Group (All Quarters)

	Monthly Earned Income	Assets	TTP
Control (n=37)	\$108.73	\$873.90	\$26.02
Study (n=51)	\$44.18	\$217.57	\$2.89

Figure 13 shows the annualized average monthly earned income, which is the average monthly income multiplied by 12 months, by household size for the quarter ending June 2020 when the data analysis began, and for the quarter ending March 2022 when the analysis ended. The annualized average monthly earned income by household size is compared with the 2021 RAD income limits for households at or below 30% of the area median income (AMI) for Fairfax County (Fairfax County Housing and Community Development, n.d.), which is the level for extremely low-income households. The figure shows that while there were some gains by the end of the study compared to the beginning, these increases did not effectively lift the study or control group households out of extremely low-income levels. There were a few exceptions, including 2-person study households, and 3-person and 4-person control households, where the annualized average household earned income levels were higher than the extremely low-income threshold by March 2022.

Annualized Average Household Earned Income Pre- (June 2020) and Post- (March 2022) Rent Reform vs. 30% AMI Levels by Household Size

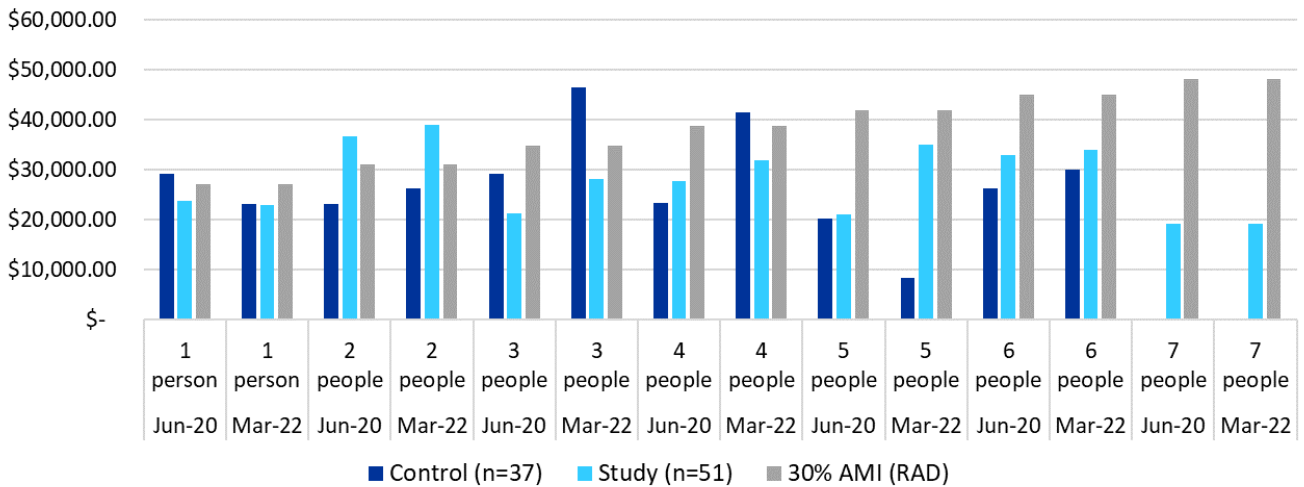


Figure 13. Annualized Average Household Earned Income Pre- (June 2020) and Post- (March 2022) Rent Reform vs. 30% AMI Levels by Household Size

Exploring the relationship between gender and average monthly earned income, there was little difference between the control and study groups, though women in the study group earned \$140 less

on average than women in the control group, whereas men in the study group earned \$280 more on average than men in the control group (Fig. 14).

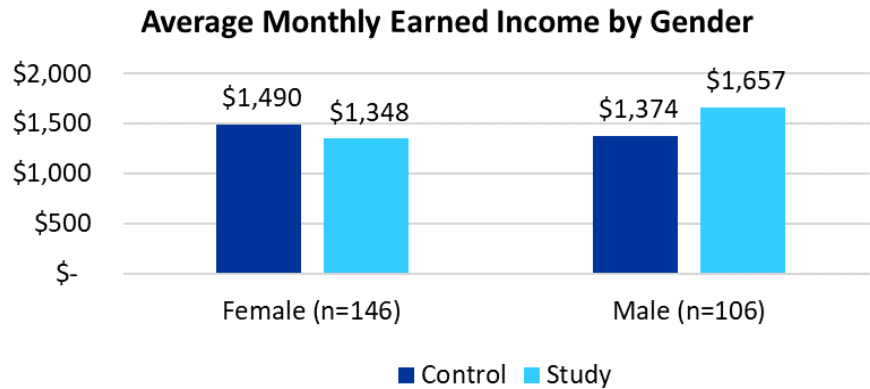


Figure 14. Average Monthly Earned Income by Gender

Employment status by gender did not significantly differ between the study and control groups (Table 5). Slightly more women in the control group received unemployment benefits and other wages, whereas slightly more women in the study group received child support and non-wage sources of income. Among the men, slightly more participants in the study group earned other wages.

Table 5. Employment Status by Gender for Control vs. Study Groups

	Control	Study	Gender Subtotal
Female (n=76)	66%	62%	63%
Own Business Income	2%	3%	3%
Child Support	0%	3%	2%
Non-Wage Sources	2%	4%	3%
Unemployment Benefits	11%	7%	8%
Other Wage	51%	45%	48%
Male (n=44)	34%	38%	37%
Own Business Income	4%	3%	3%
Non-Wage Sources	0%	1%	1%
Unemployment Benefits	4%	5%	5%
Other Wage	26%	29%	28%
Grand Total	100%	100%	100%

When examining average monthly earned income by age range (Fig. 15), the control group appears to have noticeable advantages in the 30-59 years of age range. This chart includes income from multiple sources, including business and wage income. When isolating averages for business and wage income alone, the control group earned \$1,817 on average in comparison to the study group earning \$1,720 on average per month.

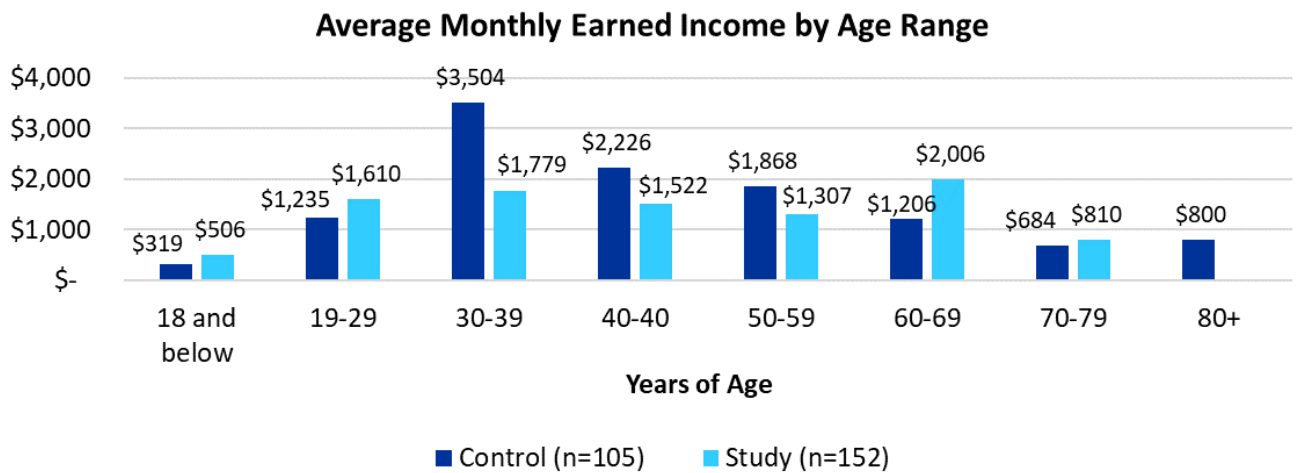


Figure 15. Average Monthly Earned Income by Age Range

Changes to Household Composition

Over the course of the study, 13 household members were removed mostly due to moving out of their households, however, one who was a head of household passed away in the final quarter analyzed (December 2021-March 2022). Of those removed, 8 were from the control group and 5 were from the study group. The average age of those who moved out was 23 years old. One household member was added to both groups due to a birth. A small number of households moved from RAD to HCV housing during the study, which is supported more broadly by the FCRHA as households progress along the continuum towards self-sufficiency. Staff confirmed that the small number that moved had little effect on the results of the study and that participation in the rent reform study did not impede households from transitioning to more appropriate housing as the need arose.

Reported Impact of COVID-19 and the Work Stabilization Deduction

Participants reporting changes to income and/or employment each quarter were asked by the case manager if these changes were related to COVID-19, and the study group participants were also asked if the changes were directly motivated by the work stabilization deduction.

- A majority of both the study and control group household members reported on average that their income and employment changes were *not* related to COVID-19 (Table 6).
- A majority of the study group over all quarters (an average of 73%) said that the work stabilization deduction *did* motivate their changes in employment and income.
- Both of these majorities were consistent from quarter to quarter.

Table 6. Average Participant Income and Employment Changes Related to COVID-19 (Yes or No)

March 2020-2022	NO		YES		TOTAL
Overall Average Per Quarter	70	80.5%	17	19.5%	87
Control	32	80%	8	20%	40
Study	38	81%	9	19%	47

5. Discussion

From the administrative data analysis, the research team cannot conclude that the work stabilization deduction had a positive impact on the study households, primarily in light of the fact that the control households saw greater increases in earned income and assets over the course of the 2-year study period. Regarding assets, there were a few outlier households in the control group that skewed the average in a positive direction. The demographic differences between the study and control group households explored above do not appear to be significant enough to fully explain why the control group fared relatively better.

However, the overall gains for either group over two years on average did not substantially increase household income levels in comparison to area median income (AMI), though some households did move to HCV housing during the study and some younger members moved out of the household due to increased financial independence. This lack of appreciable gains may point to broader variables, such as unemployment during COVID-19 and the ripple effects of that, having an impact on households' ability to increase their self-sufficiency. This is despite the record of participants in the study group reporting

that the work stabilization deduction motivated some of their changes to employment and income, and that a majority of participants in both groups consistently told the case manager that changes to their income and employment were not related to COVID-19.

The following sections provide additional context to reflect on the challenges and limitations of implementing the rent reform, and to speculate on the influence of unemployment rates and job type, race, ethnicity, gender, and factors related to COVID-19, such as family responsibilities or work-related risk of infection, that confound any clear conclusions that may be drawn from the findings of this rent reform evaluation. Similarly, it is difficult to connect these findings with the results from previous rent reform studies that occurred pre-COVID-19.

Implementing the Rent Reform

Recruiting individuals to participate in the rent reform study was a challenge, as noted above. Staff indicated that one factor influencing the lack of client interest may have been the FCRHA's relatively recent conversion of client housing from public housing to RAD properties as recently as 2018. This conversion involved new and different housing policies and may have led to engagement fatigue among clients, as well as a lack of trust or confidence that a new program could benefit them.

The case manager affirmed that most participants who agreed to be in the study understood the work stabilization deduction incentive and how it would impact their rent. Interestingly, the case manager reported that younger work-able members in the study households seemed to take advantage of the work stabilization deduction more so than heads of households. However, these younger members moved out of the household just ahead of recertification because of concerns their increased income would impact the household TTP. The case manager also observed younger household members increasing employment activity over time in the control households, such as looking for jobs, pursuing additional education, etc. This signals a move towards increased self-sufficiency of younger, work-able members in general.

The case manager suggested that control group households did not think the quarterly petty cash stipends they received were adequate in comparison to the potential benefits available to study group households. There was also confusion among the study group households regarding whether the work stabilization deduction would last forever or just for the duration of the study. The FCRHA noted that there is a need to continue to communicate the end date of the work stabilization deduction in FY2024, and whether it will be a tapered process or a hard stop.

Influence of Broader Trends Related to Employment and COVID-19

COVID-19 posed a significant challenge regarding how to interpret the findings from March 2020 onwards due to the very uncertain employment environment among other major changes experienced by participating households. It was not clear to the FCRHA staff why a majority of participants consistently reported that COVID-19 did *not* directly impact their employment and income changes, considering what a significant impact the pandemic has had on employment in general. One staff member suggested that RAD-PBV households have been more steadily employed than other households regardless of the pandemic's effects. Another possibility is that study households kept working in order to receive the work stabilization deduction. According to the FCRHA staff, other PHAs have reiterated that many clients remained in service jobs throughout the pandemic in sectors that did not completely shut down.

At the national level, despite a precipitous drop in overall employment in March 2020, by the spring of 2021, “approximately 60 percent of jobs lost had returned, but employment was still down compared to pre-pandemic levels” (Auginbaugh & Rothstein, 2022, n.p.). Between March 2021 and March 2022, average hourly earnings increased by 5.6 percent (BLS, 2022a). By March 2022, employment rates and payroll participation were much closer to pre-pandemic levels (Fig. 16), though employment was still down by 1.6 million, or 1.0 percent compared to February 2020. These figures vary by employment sector, with leisure and hospitality, manufacturing, social assistance, and health care still lagging behind pre-pandemic levels as of March 2022 (Table 7).

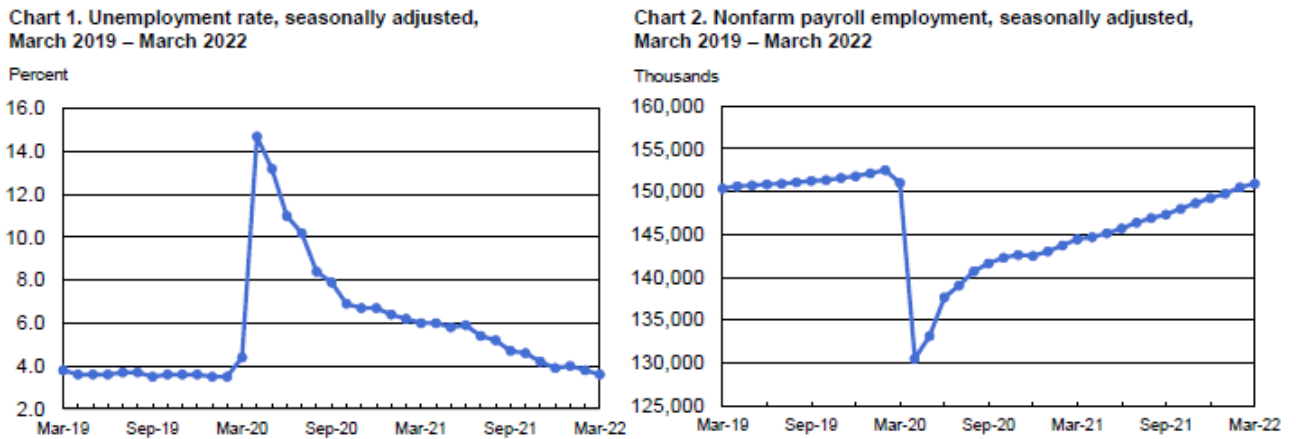


Figure 16. Unemployment Rate (left) and Nonfarm Payroll Employment by the Thousands (right) Before and During COVID-19 (BLS, 2022a, p. 1)

In Fairfax County, in particular, unemployment rates followed a similar trend, peaking at 10.1% in April 2020; the unemployment rate was 2.3% as of March 2022 (BLS, 2022b).

The Economic Policy Institute had previously reported one year into the pandemic that low-wage, lower-level employees in the leisure and hospitality service sector had seen the biggest cuts to employment, especially among minority women (Gould & Kassa, 2021). Women tend to be employed at higher rates in sectors such as hospitality, food services, and personal care and earn less than their male counterparts, in part because of gender discrimination, lack of access to the same resources or working in fields that pay less (Barua, 2022). Studies have also found that COVID-19 disproportionately impacted working women with caregiving responsibilities, due to childcare centers and schools shutting down during the pandemic and the historic trend of women shouldering more childcare responsibilities in general, leading to higher job loss among women with dependents during the pandemic (Bateman & Ross, 2020).

Table 7. Nonfarm Payroll Employment by Sector, February 2020 vs. Current (March 2022) (BLS, 2022a, pp. 3-4)

Sector	Change in Jobs (March 2022)	Current Employment Relative to February 2020
Total	+431,000	-1.6 million (-1%)
Leisure and Hospitality	+112,000	-1.5 million (-8.7%)

Sector	Change in Jobs (March 2022)	Current Employment Relative to February 2020
Professional and Business Services	+102,000	+723,000
Retail Trade	+49,000	+278,000
Manufacturing	+38,000	-128,000 (-1%)
Social Assistance	+25,000	-126,000 (-2.9%)
Construction	+19,000	Same
Financial Activities	+16,000	+41,000
Health Care	+8,000	-298,000 (-1.8%)
Transportation and Warehousing	-1,000	+608,000

Factors Related to COVID-19

As data regarding COVID-19 rates of infection and mortality became available throughout the pandemic, numerous studies have reported higher rates among people of color, immigrants, and refugees (Hill & Artiga, 2022; Rolland & Kim, n.d.). Intergenerational trauma, systemic racism, poorer living conditions, occupational exposure, religious preferences, lack of access to high quality healthcare, pre-existing health conditions, and mistrust in the healthcare system have all been attributed to why rates are higher among these populations. Noncitizen immigrants have faced several barriers to seeking treatment including concerns about treatment costs if not insured, language and literacy challenges, fear of linkages between immigration enforcement and use of public assistance, and misinformation about the safety, accessibility, and efficacy of the vaccine (Artiga et al., 2021). For those working in healthcare and other workforce sectors requiring vaccination, refusal to get vaccinated has led to a loss of employment. Similarly, fear of contracting the virus at work has kept many people out of the workforce, especially in public-facing jobs, during the pandemic.

Implications for the MTW Rent Reform Study and Control Group Participants

In light of these broader trends, it is worth reiterating that a majority of both study and control groups were female, approximately 75% of the participant cohort was non-white and did not speak English as a primary language, and the study group in particular had 20% more households with dependent children. While it was not known to the research team what types of jobs work-able members were working, their health status, or their level of education and English proficiency, it is reasonable to assume that a significant percentage of work-able participants were negatively affected by the employment and COVID-19 trends described above.

Limitations to the Evaluation and Interpretation of the Results

Due to the design of the evaluation and proposed scope of work, the evaluation team did not directly observe or participate in client engagement, such as during initial recruitment to the study or follow-up recertifications. This limited the researchers’ ability to understand underlying factors impacting client participation in the study and their employment activities more generally, and to ask follow-up questions exploring the influence of COVID-19 and the work stabilization deduction on changes to their employment situation.

While the quarterly change data indicates much more activity occurring in the last two quarter comparisons (Q6 - Q7 and Q7 - Q8), it is difficult to determine if this is related to improving employment rates, COVID-19 events, or primarily due to YARDI data updates that occurred during the second round of recertifications (Fig. 17). This illuminates a larger evaluation challenge when working with administrative data for MTW households affected by multiple policies and interventions at the same time. It was difficult to accurately monitor changes to earned income and TTP on a quarterly basis due to the interim recertification policy and efforts to reduce administrative burden, such as reducing frequent readjustments to the TTP. In a 2018 memo to the MTW Research Advisory Committee, HUD’s Office of Policy Development and Research provided recommendations for rent reform evaluations regarding the appropriate eligibility criteria for expanding MTW, which types of rent reform policies should be tested, and how to isolate the effects. The memo acknowledges the periodic tension between policy and research in allowing PHAs to fully implement MTW programs as intended using a flexible and multilayered approach, while still being able to evaluate specific outcomes (Office of Policy Development & Research, 2018).

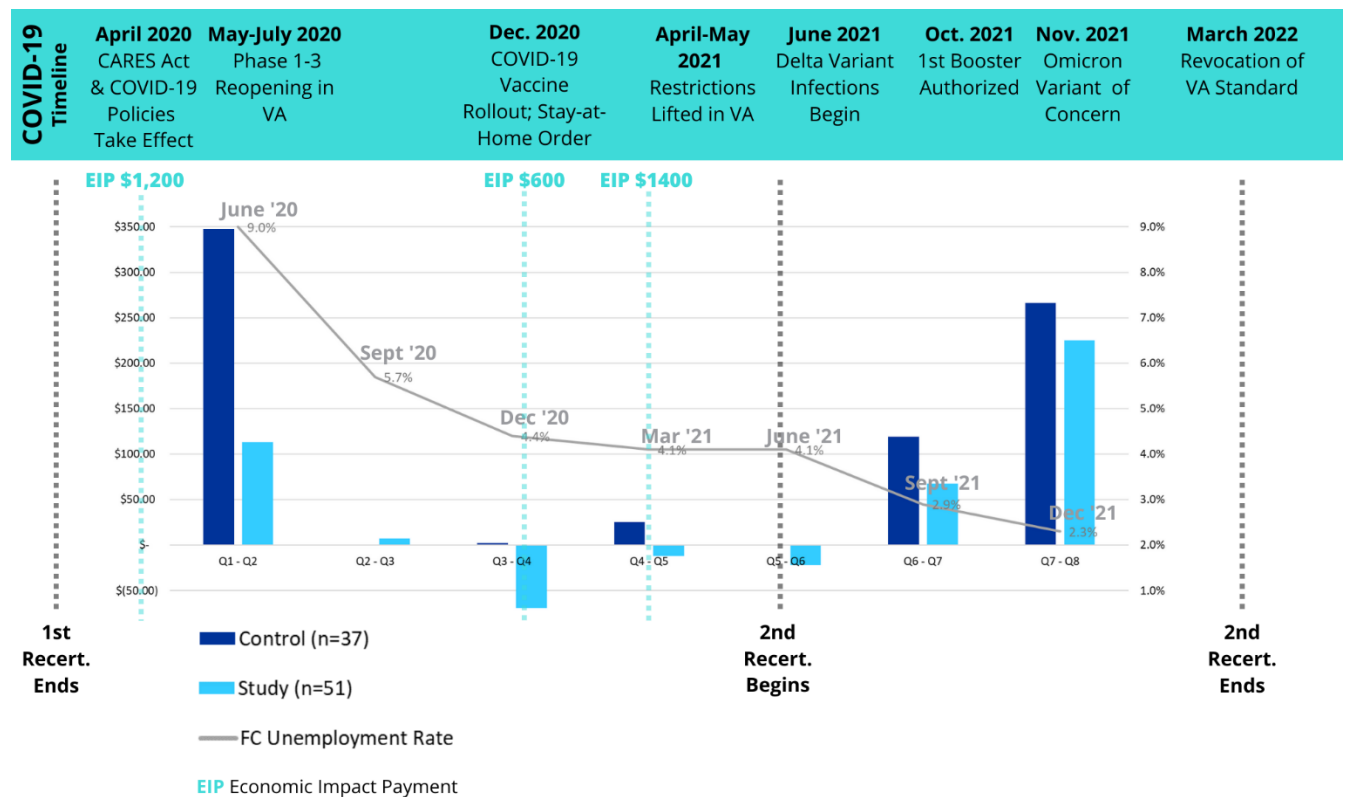


Figure 17. Comparison of Average Changes to Monthly Household Earned Income, Unemployment Rate in Fairfax County (FC) (BLS, 2022b), COVID-19 Events (CDC, 2022), and FCRHA’s Recertification Schedule

The FCRHA staff and the evaluation team also experienced difficulties accessing accurate and complete YARDI data. Data for some variables, such as the amount of TANF received by households, were not provided, which limited the outcome analysis regarding the work stabilization deduction’s impacts on changes to other self-sufficiency metrics, such as decreasing reliance on public assistance. The transition of several households from RAD to HCV also complicated how the households were coded in YARDI and therefore required additional searching in the YARDI database to retrieve the quarterly data used for the

analysis. Not all of the missing data could be retrieved for some of these cases, which led to incomplete data in the research team's database. Complications regarding YARDI have arisen in other MTW studies, limiting PHAs' ability to nimbly monitor changes over time (Rohe et al., 2012, p. 11).

The research design originally included 300 households; the proposed sample was reduced by 212 households during the recruitment process. Having to work with a small sample size limited the statistical significance of the results and the ability to conduct difference-in-differences matching between the study and control households. While informed consent is the standard in human subjects research, it was not clear to the evaluation team during the literature review whether all MTW programs utilize informed consent while enrolling PHA households in rent reform evaluations. If not already available, clarity from HUD would be helpful regarding whether consent to participate should be implied for all interventions as a condition of being a PHA client or whether consent must be explicitly requested for each new policy intervention. Regardless, for this study, the FCRHA staff emphasized that mandated participation in a MTW intervention without informed consent would not comply with legal or cultural expectations within its agency.

6. Conclusions

The research team endeavored to ensure that the samples included in the analysis were representative of the households associated with the program, however, the original matched sample planned for the study was greatly reduced in size during the recruitment process. It is not known exactly why this happened, though FCRHA staff suggested it may have been due to engagement fatigue among households impacted by previous PHA policies, leading to a lack of interest in participating in this study. The demographic characteristics between the study and control households that did participate were not dramatically different to the point where they may have impacted the results. As mentioned earlier, the primary issue that potentially impacted the reliability of the findings was the onset of the COVID-19 pandemic. Throughout the study, the research team speculated on particular patterns being observed, but did not have data to explain or confirm these outcomes, particularly related to household health conditions.

Several questions remain unanswered regarding the efficacy of the work stabilization deduction as a rent reform tool worth implementing further. The research team recommends continuing the work stabilization deduction to better understand its impact. Additional studies are needed, particularly those involving a larger, matched sample and conducted post-COVID-19, when workforce trends and employment rates more accurately reflect historical trends and offer more typical opportunities for rent reform participants to increase their self-sufficiency through employment.

A mixed-methods approach is also recommended to gain deeper, richer insight into the factors underlying changes in participants' income and employment. For instance, with children in 20% more study group households than control group households, did this reduce the study group's ability to sustain employment during COVID-19 if childcare responsibilities increased for (women in) these households, particularly since women were the majority gender in both the study and control groups? Qualitative methods, such as participant interviews and surveys, might have helped to identify if this or other specific factors were consistent enough to explain some of the different outcomes in average changes for the study and control groups.

Future MTW Evaluation Needs

The following recommendations discuss additional data and participant engagement activities that could strengthen the continued evaluation of this rent reform program.

- The evaluation team did not have access to the study participants’ employment details such as their employment status (e.g., full-time, part-time, seasonal), job type or sector in which they were employed, which would have been helpful to better discern patterns between income improvements and job type.
 - Furthermore, it would have been useful to survey participating households directly to gather more information about their employment opportunities and challenges before and during the pandemic.
- The County is exploring the use of a calculator that would help to combine housing, TANF, Medicaid and other qualifying criteria for the purposes of identifying the point at which a household’s income would impact their access to benefits (e.g., the “benefits cliff”), but it was not yet available for use during this pilot.
 - Implementing a calculator to estimate the impacts of the work stabilization deduction and other MTW policies during communication with clients would lend valuable insight into clients’ decision-making regarding income and employment changes.
- With the work stabilization deduction continuing through FY2024, there is an opportunity to continue to monitor changes in income and employment over time for each household in the study group, with potentially less uncertainty caused by COVID-19.
 - The FCRHA staff report that having more funding and a more robust data team on their end is needed for future evaluations, to keep YARDI records up-to-date, to interact with clients on a regular basis and remind them about the various MTW policies in place, and to learn more about their income and employment changes.
- Based on the findings from this evaluation and the literature, the following metrics are of interest for an expanded study of the work stabilization deduction as a rent reform tool:
 - Rates of use of job assistance services and potential impacts on self-sufficiency (Cadik & Nagic, 2010)
 - Changes to job type/sector and status of employment (part-time, full-time, seasonal, etc.)
 - Number of households achieving self-sufficiency, and the increase in resident mobility to neighborhoods of opportunity or better units (Home Forward, 2017)
 - Health conditions that could impact employment success, and rates of use of mental and physical healthcare services (e.g., through a data sharing partnership with local Community Services Board and other providers)
 - Childcare challenges and how these are addressed
 - Changes to credit scores (Cadik & Nagic, 2010)
 - Changes to personal transportation options for households (Cadik & Nagic, 2010)
 - Rates of TANF usage (Charlotte Housing Authority, 2017)
 - Number of hardship exemptions claimed and the reason(s) for the request (Garcia-Diaz, 2018)
 - Quality of the TTP calculation process for both clients and case managers (Abravanel et al., 2004); potential time and money saved due to a simplified process.

Appendix A. Detailed Literature Review

Moving to Work Demonstration Program

The Moving to Work (MTW) demonstration program was legislated in 1996 and implemented in 1999 to allow public housing authorities (PHAs) and the U.S. Dept. of Housing and Urban Development (HUD) greater flexibility to design and test programs that achieve cost effectiveness, provide innovative incentives for working families, and increase housing choice for low-income families (Cadik & Nogic, 2010). Only Congress may authorize additional slots to accept new participants in coordination with HUD. The Fairfax County Redevelopment and Housing Authority was one of four PHAs added to the program in 2012, pursuant to PIH Notice 2012-16 (MTW FAQ, n.d.). In 2019, 39 PHAs were participating in the MTW program. To date, there are now 109 MTW PHAs nationwide and HUD plans to expand the program to include an additional 30 PHAs by 2022 (HUD, 2022).

Participating agencies have adopted a variety of community-specific programs under four key policy areas (Cadik & Nogic, 2010): 1) preserving and revitalizing public housing, enabling “selected PHAs to give more housing opportunities to residents living in concentrations of poverty and to revitalize and preserve their public housing stock without the administrative burdens that traditional PHAs face” (p. 21); 2) streamlining housing assistance using MTW to increase cost-effectiveness of federal expenditures, where “MTW agencies are permitted to use saved costs [from streamlining housing authority operations] towards other agency activities, giving MTW agencies an increased sense of autonomy over how they allocate funds” (p. 33); 3) rent reform by streamlining and encouraging self-sufficiency through alternative rent structures, both because streamlining can reduce administrative burden and because “[a]lternative rent systems have the potential to more effectively encourage self-sufficiency and accurate reporting of income while avoiding excessive rent burden” (p. 39); and 4) self-sufficiency, supportive services and service-enriched housing where MTW agencies can leverage partnerships for increased service delivery and “take steps to encourage self-sufficiency among groups outside of their traditionally served populations by providing service-enriched housing for homeless and other special-needs populations” (p. 50).

Some Moving to Work PHAs have also participated in the Rental Assistance Demonstration (RAD) program, authorized under the Consolidated and Further Continuing Appropriations Act of 2012, which allows “PHAs to convert units to either project-based vouchers (PBVs) or project-based rental assistance (PBRA). Between 2013 and 2016, more than 90,000 public housing units converted to PBVs or PBRAs through RAD; MTW agencies converted 11,327 units. Most of the MTW public housing units converted through RAD shifted to PBVs (77 percent). Among comparison traditional PHAs, about one-half of RAD conversions were to PBRAs” (Galvez et al., 2020, p. 16).

In a study of changes in per household spending on program administration, resident services, and operating reserves for PHAs that have joined MTW, Stacy et al. (2020) found that “MTW status has no significant impact on cost per assisted household when MTW agencies are compared with traditional PHAs of similar size. Although MTW status is associated with an increase in HUD funding, the agencies use this funding to assist more households, resulting in no significant change in cost effectiveness” (p. ix).

Rent Reform

Critics of HUD’s traditional rent structure for housing choice vouchers (HCVs), where households contribute 30% of their adjusted income towards rent and utilities, have noted this creates a disincentive to work; “[b]ecause voucher holders pay 30 percent of their income (after certain exclusions and deductions) toward their rent and utilities, their subsidies fall as their incomes rise, creating an implicit marginal ‘tax’ on increased earnings” (Riccio et al., 2019, p. ES-1). This traditional policy also imposes an administrative burden on the PHAs that must adjust the subsidy as incomes rise and fall, and apply complicated rules to calculate the subsidy. With calls for increasing funding and capacity for the HCV program as a Federal reform to strengthen housing stability, affordability, and choice (Reynolds et al., 2021), it is imperative to identify methods to administer rent more efficiently and in a way that incentivizes families to become self-sufficient.

Rent reform designs attempting to do this may reduce recertification frequency, set term limits, change the way total tenant payment is calculated, eliminate or simplify the earned income deduction, change how assets are characterized as income for the purposes of calculating rent payments, implement a standard deduction, or combine a variety of other policy changes (Cadik & Nogic, 2010). MTW agencies are required to evaluate the effectiveness of their designs, and report baselines, benchmarks, and data collection methods to measure the progress of the program in meeting the three MTW statutory objectives: cost savings, self-sufficiency, and housing choices (MTW FAQ, n.d.).

In a 2018 memo to the MTW Research Advisory Committee, HUD’s Office of Policy Development and Research provided recommendations for rent reform evaluations regarding the appropriate eligibility criteria for expanding MTW, which types of rent reform policies should be tested, and how to isolate the effects. The memo acknowledges the periodic tension between policy and research in allowing PHAs to fully implement MTW programs as intended using a flexible and multilayered approach, while still being able to evaluate specific outcomes. In terms of isolating the effects of the rent reform, the memo recommends that “rent reform PHAs be restricted from implementing work requirements and term-limited assistance (time limits) while the evaluation of the alternative rent policies is ongoing” (Office of Policy Development & Research, 2018, p. 4).

Currently, evaluation of MTW rent reform activities may best occur on a case-by-case basis at the agency level. While MTW alternative rent structures can have positive impacts on self-sufficiency outcomes, the variation in implementation across programs and lack of experimental methodology has made it difficult to recommend a standard rent reform approach across all PHAs (Webb et al., 2016). Whatever standardized rent policy is ultimately adopted, it “should attempt to encourage self-sufficiency and accurate reporting of income, but also ensure that tenants are not unduly burdened” (Cadik & Nogic, 2010, pg. 6).

Methods for Evaluating Change

In order to evaluate changes over time attributable to or correlated with the rent reform demonstration, studies may implement a randomized, controlled, one-to-one matching trial, one of the more rigorous methods as it controls for some latent environmental variables not directly measured in the study (Berk, 2005; Riccio et al., 2017). Using a difference-in-differences regression analysis, the study can also determine changes over time in the treatment cohort compared with changes over time in the control cohort. A difference-in-differences matching procedure (DIDMP) is used to analyze observational data because it is not constrained by the assumptions necessary to use least squares regression; namely, the covariates used to control for selection effects may not show similar distributions for treated and

untreated observations, and there may not be a linear relation between covariates and outcomes (Vandegrift & Zanoni, 2018).

Carlson et al. (2012) combined difference-in-differences regression analysis with propensity score matching (DID-PSM) in order to study the longitudinal economic and demographic data of low-income households for six years following study participants' receipt of a Section 8 housing choice voucher. The methodological combination has been supported in the literature for maximizing the "advantages of each method while mitigating the limitations associated with each procedure. Indeed, prior research has found that combining propensity score matching with regression adjustment is preferable to applying either method by itself (Imbens & Wooldridge, 2008; Gelman & Hill, 2007)" (Carlson et al., 2012, p. 135).

Gebel and Voßemer (2014) similarly used DID-PSM to study changes in health between a treatment group experiencing a change in employment compared with a control group counterfactual not experiencing any change in employment over time. Within-person comparisons eliminated unobserved individual fixed effects. "In contrast to a simple fixed-effects estimator, the between-comparison with the trend of a control group additionally removes any common period effects that affect the treatment and control group in identical ways as well as any ageing effects. For example, a simple fixed-effects estimator would underestimate the health effects of reemployment if the health of those continuously unemployed further declines over time" (p. 131).

When using DID analysis, the baseline means established between treatment and control groups may not be equivalent at the start of the treatment, a "common problem with quasi-experimental research" (Rohe et al., 2015, p. 10). Rohe et al. (2015) further divided the treatment groups into separate cohorts depending on whether they were participating in the Family Self-Sufficiency program, as FSS households are self-selecting and may represent more motivated families. The nearest-neighborhood propensity score matching to identify a control was based on all possible sources of income (e.g. earned wages, disability, etc.) and household size at the beginning of the study, with 3:1 matching without replacement due to the small size of the treatment groups. T-tests showed no significantly different means between the treatment and control groups among the matches, though certain household characteristics (adjusted income, age, and household size) needed to be controlled for in the difference-in-differences regression due to overall differences between the control and treatment groups.

The comparative interrupted time series (CITS) design can also be used for nonexperimental comparison between groups over time; in fact, it is a more rigorous variation of the DID approach because it "implicitly controls for differences in the baseline mean *and* trends between the treatment and comparison group" by collecting adequate pre-study data to establish the baseline trend (Somers et al., 2013, p. iii). However, such pre-study data may not be available or may no longer correspond to the groups of interest at the time that the treatment is implemented. For example, the households of interest in the Moving To Work program are frequently exposed to new combinations of treatments as new policies are implemented; furthermore, households move in and out of the program on a regular basis, so the composition of the group fluctuates over time, as do the program conditions influencing household decision-making and behavior.

However, CITS has been used to monitor housing choice and self-sufficiency outcomes for clients served by Moving to Work housing agencies where sufficient preliminary data were available (Treskon et al., 2021). A parallel MTW study has also begun to monitor the impacts of a rent reform policy on four Moving to Work housing agencies in Louisville, KY; Lexington, KY; San Antonio, TX; and Washington,

D.C., by comparing the average outcomes of the new and existing rent rules groups using regression adjustments to increase the precision of the statistical estimates (Riccio et al., 2017, p. 23).

A 2018 GAO study compared MTW agencies with non-MTW agencies on several outcomes broadly representing housing availability and income, such as voucher utilization rate and expenses per household, following a Rubin Causal Model that could nonetheless not generalize to the entire population of MTW agencies due to discrepancies among program policies (Garcia-Diaz, 2018). The MTW agencies of interest were matched 1:1 with non-MTW agencies holding basic household, financial, and geographic characteristics constant using American Community Survey (ACS) and internal agency data, employing propensity scores, Mahalanbois distance (MD), and genetic matching techniques. The study then estimated differences in mean and median outcomes using paired t-tests and nonparametric Wilcoxon signed-rank tests, and Generalized Linear Models to assess outcomes from 2009–2015 in the matched sample. The study addressed the potential for bias arising from heteroscedasticity and autocorrelation by using weights to decrease the influence of extreme observations, using autoregressive approximation and an autoregressive function to reduce the temporal dependence in the data (Garcia-Diaz, 2018, p. 93).

When analyzing time-series data with regression, such as ordinary least squares (OLS), certain necessary assumptions about the data may not be met, requiring certain adjustments. For example, researchers examining property values as well as criminal behavior to assess the impact of supportive housing on the surrounding neighborhood had to remove outliers and control for heteroskedasticity of the model error terms in property value regressions. They did this using a covariance matrix to correct all standard errors, and a least-squares dummy variable approach to control for both heteroskedasticity and spatial autocorrelation (Galster, 2000, pp. 3-20). Another study used household data collected by the Atlanta Housing Authority to compare a treatment group of 1,235 households living in three housing projects that were demolished as a result of the HOPE IV revitalization, with a control group of 1,483 households who lived in three housing projects that were not revitalized during the time frame of the study, 1995-2001 (Boston, 2005). The analysis involved adjusted descriptive statistical techniques and two logistic regression models used to examine differences in attrition between the treatment and control groups after controlling for other factors.

Using descriptive statistics, correlation, and multivariate regression analysis, Owens and Baum (2009) studied a longitudinal sample of welfare recipients using National Longitudinal Survey of Youth (NLSY79) data to track individuals' receipt of welfare in relation to their employment status. The study explored whether those individuals receiving housing assistance were more or less likely to leave welfare and become employed. Different factors considered included the potential association between housing assistance and greater economic disadvantage, whether those in assisted housing had been on welfare longer, or whether housing assistance influenced access to different economic opportunities, such as mobility to a higher-income neighborhood. The analysis controlled for demographics, local economic conditions, and welfare benefits by state.

Impacts of Rent Reform Programs

The following section describes findings from rent reform programs and reports.

In a randomized controlled study of four PHAs, including the Lexington-Fayette Urban County Housing Authority, Louisville Metropolitan Housing Authority, San Antonio Housing Authority, and the District of Columbia Housing Authority, interim results of a rent reform program beginning in 2015 involving a 3-

year recertification schedule, a new formula for calculating the family's total tenant payment (TTP) and subsidy, and safeguards for families were reported (Riccio et al., 2019). The study found mostly similar, short-term results across the four locations, including (pp. ES-5-12):

- “The new rent policy did not improve labor market outcomes for household heads with all four locations combined.
- The new rent rules produced positive impacts on labor market outcomes in Lexington and San Antonio but not in Louisville or Washington, D.C.
- A modest minimum TTP may not affect household heads' employment or earnings.
- Triennial recertifications may have a positive effect on household heads' earnings independent of the minimum TTP.
- So far, impacts on household heads' earnings have had few spillover effects on families' receipt of TANF or SNAP benefits.
- The new rent rules modestly increased the likelihood that families would still be receiving housing subsidies by the end of the 30-month follow-up period.
- On average, families in the new rent rules group paid somewhat less toward their housing costs while in the voucher program compared with the existing rules group.
- Compared with the control group, families in the new rent rules group received more in total rental subsidies, an expected short-term result of the policy changes.
- A growing proportion of families used the new rent policy's hardship remedies.
- The new rent policy has not affected the likelihood of household heads using special housing or services for the homeless.
- The new rent policy substantially reduced the likelihood of PHA actions (with or on behalf of families) as families' circumstances changed.
- The process of calculating retrospective income in setting families' TTPs under the new rent policy was often burdensome for staff.
- Families in the new rent rules group appreciated the switch to triennial recertifications.
- The new rent policy appears, so far, to cost no more to administer than the existing policy, and probably costs less.”

A Jobs-Plus Community Revitalization Initiative for Public Housing Families demonstration from 1998 to 2003 was evaluated using up to 12 years of resident data prior to and during the study period. Jobs Plus in tandem with two MTW agencies in five cities total provided employment-related services to residents, while also restructuring rent to allow greater tenant savings alongside the fostering of information-sharing within the public housing community to help more residents learn about employment opportunities. An independent, third-party study found that “residents in Jobs-Plus sites had earnings that were an average of 6.2 percent higher than those at the control sites. At the three sites that had more fully-implemented programs, Jobs-Plus had an average earnings effect of 14 percent per year, and nearly 20 percent in the fourth year. There were increases in employment as well, but they were not as consistent as the increases in earnings” (Cadik & Nogie, 2010, pg. 47). While positive earnings were realized, particularly among immigrant men, quality of life did not significantly increase within the public housing developments. The combination of variables complicates the interpretation of the effects of the rent reform aspect of the Jobs Plus program in increasing income. While this program can be adapted to a variety of housing markets, challenges experienced included supporting collaboration among agencies and staff in the implementation of new programs, and assuring residents of the benefits of the reform.

In a 2004 summary assessment of HUD's Moving to Work Demonstration, the Urban Institute found that some agencies enacting rent reforms did not decrease staff time spent with residents, however the role of staff evolved into more of a mentor/advocate position rather than an auditor/investigator. Another finding, while not conclusive due to lack of systematic data on the incidence of reported errors, was that "simplification of rent rules and subsidy calculations... [meant] that tenants were less likely to under-report their incomes, and staff were less likely to miscalculate tenant rent contributions" (Abravanel et al., 2004, pg. 29). However, the assessment did not find any clear distinction among local rent restructuring demonstrations and reported gains in income and employment. "Agencies that continued to set rents on the basis of income, making only modest changes in the size or timing of rent adjustments, were just as likely to report substantial employment gains as agencies that completely detached rents from incomes, or that implemented intensive programs of case management and support services" (pg. 28).

The U.S. Government Accountability Office (GAO) assessed the MTW program in light of 2015 Congressional approval for program expansion to 100 more agencies (Garcia-Diaz, 2018). GAO reviewed HUD and MTW policies, interviewed staff and tenants, and conducted statistical analysis of data from MTW and non-MTW agencies regarding public housing occupancy rates, voucher use, and program expenditures. While HUD disputed some of the recommendations, the GAO study findings suggested the following steps: completion of workforce planning to determine if staff could adequately manage an expansion; better documentation of compliance with the five demonstration requirements; revised guidance to MTW agencies about which elements are required to complete impact analyses, annual reevaluations, and hardship policies; and developing a plan to analyze information from all agencies in a standardized way for various rent reform, work-requirement, and time-limit policies on tenants – among other recommendations.

The GAO study lacked adequate data to significantly assess the impacts of MTW demonstrations on tenants, however interviews with a limited sample of tenants indicated some clients had trouble understanding and receiving hardship support according to certain agency policies. Unclear communication about hardship could compromise a study participant's ability to claim exemption from the demonstration or receive assistance for unanticipated impacts. Furthermore, based on review of the 2015 annual reports, the assessment found "that 83 of the 194 policies... identified as rent reform did not include any of the hardship data HUD requires agencies to report for rent-reform activities" (Garcia-Diaz, 2018, pg. 45). Such a deficiency compromises the agency's ability to monitor the progress of the rent reform initiative.

Mahdavi (2009) conducted an evaluation of a Moving to Work rent subsidy demonstration administered by the Massachusetts Department of Housing and Community Development in two locations, South Worcester County and Boston, both including a fixed shallow rent subsidy, three-year time limit, supplementary support funds and case management towards the goal of household self-sufficiency. The Worcester program (122 vouchers) featured work-ready households already placed within a fairly affordable housing market in contrast to the Boston sample (53 vouchers in use), which served families moving from homelessness into a very tight, expensive housing market. Using a proxy control from a sample of comparable households in the housing choice voucher program (HCVP) that did not participate in the demonstration, the study used current intake data to monitor employment and income differences.

In Boston, while "there was an annual growth rate of 31.4% in the median employment income, the majority of the difference is from individuals who went from unemployed (\$0 income) to employed. 47%

of all clients experienced an increase in employment income of \$500/mo or greater and 68% had an increase of any value” (Mahdavi, 2009, pg. 43). Despite increases, the median income of this group would still be considered extremely poor based on 30% of the Metro Boston area Average Median Income (AMI). Furthermore, “[o]f the clients who have been in the program for 24 months or more, 67% had an increase of at least \$500 in income compared to just 27% of those who have been in the program for less than 24 months,” suggesting that there is a transition period under the treatment that would delay immediate beneficial results. The study also found that the median income of HCVP participants was over 80% lower than that of MTW participants (\$1,021/mo compared to \$1,856/mo). “Interestingly, the HCVP median income is almost the same as the MtW participants’ median income at baseline, which might be further evidence of the benefits of more intensive case management and support services. Again, because they are comparable groups, and MtW clients income was the same at intake as HCVP participants, the change suggests there is benefit to the MtW treatment” (Mahdavi, 2009, pg. 46).

In S. Worcester, while unemployment among MTW households increased over time, median income grew at an annual rate of 2.6% to \$1,734/month (\$20,808/year), whereas average income decreased due to the lowest 40% of earners having less income during the second recertification. Households nearing graduation were on average less than \$200/mo above the poverty line, below 30% of AMI, and fewer than half were earning a living wage (Mahdavi, 2009, pg. 62). The study found that MTW clients did “better in terms of employment, earning more than twice as much as HCVP participants. However, MtW client’s median income at intake was already almost double that of HCVP clients, suggesting that the MtW program was drawing from a more ‘employment ready’ population. Because they are no longer receiving a rental subsidy, MtW participants are paying three times more in rent” (Mahdavi, 2009, pg. 64). Terminating the assistance provided through a support account to pay for household expenditures would likely undermine a household’s self-sufficiency, even if that household could cover the market rent expenses upon graduation from the MTW program.

Select MTW Rent Reform Findings by PHA

The following compilation summarizes basic findings from rent reform activities across a sampling of the MTW public housing authorities (PHA) (Table A1). Additional details from each case study follow Table A1. In some cases, agencies partnered with an independent research team, such as from a university, to analyze results and/or conduct additional study.

Table A1. Summary of Selected Outcomes Reported by MTW PHA Demonstrations

PHA	Initial FY	Rent Reform	Selected Reported Outcomes
Alaska Housing and Finance Corporation (Alaska Housing and Finance Corporation, 2016)	2014	Income-based rent with financial and educational incentives	FY2015-2016: <ul style="list-style-type: none"> · 13% increase in participating families · 7% increase in households working full-time · Average gross income increase of \$7,000 · \$10,000 avg. income increase by the third year · 300 families moved off the housing waitlists

PHA	Initial FY	Rent Reform	Selected Reported Outcomes
Boulder Housing Partners (Boulder Housing Partners, 2017)	2014	Flat-tiered rent based on household size and income, with a min. rent	FY2016: <ul style="list-style-type: none"> · 26% increase in household income · 30% increase in full-time employment · 58% decrease in part-time employment · 57% decrease in unemployment
Cambridge Housing Authority (Cadik & Nogic, 2010)	2006	Flat-tiered rent with a min. rent and utility payment assistance	FY2008: <ul style="list-style-type: none"> · Average gross income increases of 7.5% · Average household employment income increases of 11.7% · 4% increase in the PHA's income from rent · 41 percent decrease in avg. time to complete tenant recertifications
Charlotte Housing Authority (Charlotte Housing Authority, 2017)	2011	Income-based, stepped rent, with interim income reexaminations and a work requirement	FY2016: <ul style="list-style-type: none"> · Increase in average amount of savings/escrow of households to \$1,332 · Decrease in number of households receiving TANF from 231 to 168 over a two-year period · 9 households transitioned to self-sufficiency
Housing Authority of Portland/Home Forward (Home Forward, 2017)	2012	Income-based and min. rent requirement increasing over time	FY2017: <ul style="list-style-type: none"> · 592 households transitioned to self-sufficiency · \$47,000 in agency cost savings · 1,800 staff hours reduced · Average earned household income increase of \$755 · 20 households no longer receiving TANF · 0 households displaced · 5% increase in households moving to a better location · 2.5% increase in median family income (MFI)
Housing Authority of Tulare County (Cadik & Nogic, 2010)	1999	Time limits for housing subsidies paired with a	FY2008-2010: <ul style="list-style-type: none"> · 69% of households transitioned from public housing assistance by year 5

PHA	Initial FY	Rent Reform	Selected Reported Outcomes
		system of flat rents based on unit size	<ul style="list-style-type: none"> · Flat-rent households experienced higher earnings in contrast to income-based rent · Surplus income spent on more reliable transportation and improving credit scores
Lincoln Housing Authority (The Housing Authority of the City of Lincoln, Nebraska, 2018)	1999, 2008, 2009	Six types of rent reform, including interim and biennial reexaminations, minimum earned income, income-based and minimum rents, increased rent burden allowed, and avg. utility allowances	<p>FY2017:</p> <ul style="list-style-type: none"> · 58% of households ended their MEI requirement through employment or participation in education or a self-sufficiency program · \$3,000 increase in average household earned income for housing choice voucher recipients over four years · 22% decline in unemployment for work-able households towards full or part-time employment
Louisville Metro Housing Authority (Louisville Metro Housing Authority, 2016)	2014	Simplified income determination and utility allowance, triennial income recertification policy, and a minimum rent	<p>FY2016:</p> <ul style="list-style-type: none"> · 1% more of alt. rent households transitioned to self-sufficiency than control group · Reduction in time and cost to recertify households and to determine income and rent · Average monthly subsidy reduction of \$20 for the alt. rent group · Average earned income of alt. group is \$2,000 more than control group
Minneapolis Public Housing Authority (Minneapolis Public Housing Authority, 2018)	2014	Flat subsidy based on household income, utility allowance, disability status, and number of bedrooms; a minimum rent; a 40% affordability cap; revised	<p>FY2017-2018:</p> <ul style="list-style-type: none"> · 13% earned income increase · 62% of work-able households had a head of household with earned income · 44 households transitioned to self-sufficiency, which is 19 more than the benchmark · Agency cost savings of 12% · 579 fewer families received TANF compared with the benchmark

PHA	Initial FY	Rent Reform	Selected Reported Outcomes
		existing policies on asset verification; limits to interim re-examinations; etc.	
The Housing Authority of Columbus, GA (The Housing Authority of Columbus, Georgia, 2017)	2014	Increased minimum rent, a lower calculated rent percentage, provision of work incentives, tiered rent, financial assistance for chronically unemployed families, increased Family Self-Sufficiency (FSS) service	FY2016-2017: <ul style="list-style-type: none"> · Average earned income increased to \$15,782 in the treatment group · Increase of 14 employed households · 6.5% increase in full-time employment compared with control group · 24% drop in unemployment in treatment households
Vancouver Housing Authority (Vancouver Housing Authority, 2017)	2013, 2015	Min. income-based rent, addition of a 33% Household Share TTP calculation	FY2016: <ul style="list-style-type: none"> · 69 households transitioned to self-sufficiency · \$514,085 in agency cost savings · Increase in average earned income of about \$4,000 · 19 more households employed full-time; 47 part-time · 68 fewer households receiving TANF · 60% of work-able households reported earned income

Alaska Housing and Finance Corporation (AHFC)

AHFC launched a rent reform initiative in FY 2014 to include both a Classic and Step program, for senior and disabled households and work-able families, respectively. In the Step program, “participating families pay rent based on the family’s income in the first year. In years two through five, the financial assistance provided by AHFC gradually decreases while the family portion increases. Families attend an examination annually to track their progress. Step families are required to complete a financial literacy course and are encouraged to participate in Jumpstart” (Alaska Housing and Finance Corporation, 2016, pg. 6). Participants in Jumpstart strive for economic independence with the help of a variety of financial incentives and educational opportunities administered by supportive case managers. Initial results two years into the Step program were favorable, with the agency reporting a 13% increase in the number of families in Step; a 7% increase in the number of households working full-time; gross income increase

from an average of \$20,000 to \$27,000; increased income from \$21,000 to \$31,000 for those in the third year of Step; and more than 300 families moved off the housing waiting lists as a direct result of the Step program increasing housing opportunities.

Boulder Housing Partners (BHP)

Initially launched in 2014 and amended in 2016, BHP implemented a rent reform activity for work-able families in either a housing choice or project-based voucher cohort (Boulder Housing Partners, 2017, pg. 33). The rent reform activity includes a flat-tiered rent system, where the family is assigned an income tier and rent is further calculated based on household size; a minimum rent is charged, ranging from \$120 to \$180; households are recertified every two years with limited exceptions to interim reevaluations, such as if family status changes or tier 1 income increases; and a monthly flat fee of \$125 is charged per family member who is ineligible to receive housing assistance. Income is either calculated based on current, earned income or in the absence of earned income, BHP will consider a two-year history of past income; the 26 families without current earned income saw an increase in rent due to a 26% increase in past income. The agency also implemented rent simplifications for elderly and disabled households in 2012 that were updated in 2016 to include a “flat fee per ineligible family member to be consistent across all households with mixed citizenship status” (Boulder Housing Partners, 2017, pg. 36).

Benchmarks achieved for the work-able, housing choice cohort recertified in 2016 included a 26% increase in household income, a 30% increase in full-time employment, a 58% decrease in part-time employment, no change in educational program enrollment, and a 57% decrease in unemployment. Other benchmarks were not met, where there was no decrease in the total cost of and time to complete the recertification task, too large an increase in tenant rent share due to fluctuating rent calculations, no decrease in households receiving TANF, and no increase in households receiving services (though this was not an explicit goal of the program). While two families voluntarily gave up the housing choice voucher, 27 families no longer qualified to receive HAP due to income increases above the limit. While 50 families originally claimed a hardship to cap their rent increase at 7%, all had experienced some change to remove the hardship by the recertification period in 2016, with twenty-seven of the families experiencing an increase in income. Fifty families claimed an interim recertification hardship in 2016 due to loss of income, with only nine approved and seventeen others referred to the Safety Net Program.

BHP has been collaborating with the Center for Community Engagement at the University of Colorado to evaluate which households are progressing towards self-sufficiency by administering a 2014 and 2016 survey during the recertification process, to help ensure high response rates. Findings are complicated by households entering and exiting the housing choice program during the study period, and households are compared to themselves over time due to a limited number of work-able comparison households to establish a treatment and control group. Notable initial findings include (Boulder Housing Partners, 2017, pp. 78-80):

- Median income and rent level both rose significantly in 2016 for housing choice household profiles; particularly, from \$14,351 to \$19,670 for the housing choice core group. Households were permitted to keep extra income between the two-year recertification, likely motivating earners to work more or find higher-paying positions. However, the favorable economic environment at the time also meant that public housing household income increased separately from the rent reform activity.
- Evidence of a slight overall improvement towards self-sufficiency based on several variables, such as access to health and child care, and reductions in barriers to self-sufficiency, such as

quality of childcare (likely due to state-level policy changes). For the housing choice core group, progress was greatest in the domains of child care, transportation, and employment and smallest in housing, education and food.

Cambridge Housing Authority (Cambridge)

In 2006, the Cambridge Housing Authority instituted a “tiered rent structure with a flat rent within income groups, set at 30 percent of adjusted income at the lower end of the income range for each group. As a resident’s income moved higher within each group, the rent burden would thus decrease below 30 percent and the resident would be able to keep a higher share of income... A \$50 minimum rent was also imposed in both the public housing and voucher programs and a 90-day limit on assistance was imposed on zero-income households. Cambridge paired these changes with a hardship review process and utility payment assistance” (Cadik & Nogic, 2010, pg. 41).

While there was no control group, the study found that following necessary adjustments for hardship, the policy did lead to increases in income, either due to actual increases or increases in reporting. Cambridge also streamlined its reporting policies and calculations of income to reduce the administrative burden and disregard assets less than \$50,000. These efforts saved nearly three months of administrative staff time, as well as providing tenants with extra funds from increased income as interim recertifications occurring only 1-2 years did not immediately increase their rent. Throughout the demonstration, some modifications to the rent table for elderly and disabled families were necessary as well as adjustments to the hardship policy.

Charlotte Housing Authority (CHA) (Moving Forward)

The CHA rent reform activity was launched in 2011 implementing an income-based, stepped rent, with interim income reexaminations between annual recertifications for limited conditions, such as a significant increase in child care costs or a decrease in income. Combined assets above \$5,000 were not included in the income calculation, and tiered medical and childcare deductions were based on total expenses. A work requirement with time limit sanctions was also instituted at “Moving Forward sites with supportive services during FY2015, where all non-working residents (except the elderly and persons with disabilities) underwent an assessment to determine the extent of any barriers to work” (Charlotte Housing Authority, 2017, pg. 31). Of the 89 hardship requests submitted under the rent reform activity, 69 had been approved.

Preliminary findings reported in 2012 including interviews with staff indicated that communication about the new rent reform program could have been improved, particularly with lower-level staff and other departments, which was partially addressed by hosting more “open staff meetings, the creation of cross functional project teams and the creation of both a CHA intranet and CHA University for that progress” (Rohe et al., 2012, p. 10). Reprogramming in YARDI was required in order to collect and report new data on clients, which occurred over a two-year period, and despite some improvements, staff “continued to express considerable frustration over what they described as a complicated interface, the inability of staff members to generate customized reports, and as new initiatives were introduced, the software’s poor adaptability to new data recording requirements. Staff members felt limitations in the database management program hampered their abilities to judge the effectiveness of new initiatives” (Rohe et al., 2012, p. 11). Finding qualified staff with appropriate credentials was also a challenge that slowly improved as staff participated in continuing education on the job.

Benchmarks achieved during the course of the activity as of FY2016 included cost savings through decreased staff time, the establishment of a rent calculation error baseline rate, increased public housing rental revenues, an increase in household savings, a decrease in the number of households receiving TANF, and an increase of nine families moving toward self-sufficiency (defined here as positive move out with no subsidy assistance). However, the agency had not met certain benchmarks, such as an increase in average earned household income, an increased number of head(s) of household with full-time employment, or a decrease in average Section 8 and Section 9 subsidy per household. In addition, the number of households receiving self-sufficiency services was slightly below expectations. The agency noted complications rolling out self-sufficiency services and how this potentially impacted employment training opportunities for rent reform participants. CHA was developing self-sufficiency plans for all of its public housing sites, as well as the housing choice voucher program, for 2017.

Housing Authority of Portland (Home Forward)

In 2012, Home Forward implemented a rent reform program with updates in 2014 and 2015 applicable to all MTW public housing and Housing Choice voucher households, involving a separation of senior/disabled households and work-focused families. Calculation of rent was simplified based on a percentage of income, where work-focused families pay a larger percentage of income towards rent with a minimum rent increasing over time. By year 5, work-focused families pay the larger of 31% of gross income or \$200 minimum rent. Several other conditions apply, such as case manager requirements for zero-income households, a flat, pro-rated subsidy for mixed eligible/ineligible families, a ceiling rent to replace a flat rent for public housing, and the exclusion of specific sources of income from the rent calculation. Hardship policies generally apply for public housing households whose “total monthly shelter costs exceed 50% of the total monthly income used to determine their rent subsidy” (Home Forward, 2017, pg. 33), however exceptions may also be made for voucher households facing a similar rent burden. Hardship phase-in extensions apply to households entering the program with significant health or child care costs, or several dependents. Overall, 190 households requested some type of hardship review, costing the agency \$46,254 in FY2017.

Home Forward collects information for the YARDI database through staff interviews and workflow analysis in order to calculate rent requirements and income. In 2017, the first round of work-focused households was entering year 5 of the tiered rent structure. Benchmark indicators suggested that the agency was saving money and staff time, was observing an increase in tenant rent contribution and household income, and while households were reporting changes less frequently according to a biennial or triennial recertification schedule, the agency did see an increase in Other employment for heads of household. The decrease in families receiving TANF, the number of households achieving self-sufficiency, and the increase in resident mobility to neighborhoods of opportunity or better units exceeded benchmark expectations. However, the agency did not see anticipated improvement in reducing average error rate in staff execution of rent reform tasks, or reducing household subsidy costs per unit. With a 10.5% rent increase and low vacancy rates in FY2017, the agency needed to increase subsidies to maintain stable housing options.

Housing Authority of Tulare County (HATC)

Beginning in 1999, the Housing Authority of Tulare County (HATC) sought to reflect its community’s attitude that housing assistance is meant to be temporary by implementing a “policy in which HATC non-elderly, non-disabled households become ineligible for assistance after five years or upon reaching 120% of area median income. The time limits were paired with a system of flat rents and subsidies

based on unit size. HATC provides a temporary hardship provision that gives residents extensions on assistance until the hardship can be addressed” (Cadik & Nogic, 2010, pg. 43). This approach aligned with TANF’s time limits, encouraged accurate reporting of income so that tenants could keep more of their income, and increased access to affordable housing to more families over time. HATC reported seeing higher income increases for families under the flat rent policy, where more transitioned off of public housing, some purchased market-rate homes without assistance, and several households improved credit scores and secured more reliable transportation to work. However, a flat rent structure increases overall rent burden – the flat rent/time limited assistance combination used in Tulare County would likely not work in an area with high rental costs.

Lincoln Housing Authority (LHA)

The LHA listed six types of rent reform in its report for FY2017-2018, including interim and biennial re-examinations, minimum earned income, rent calculations, rent choice, and average utility allowances (The Housing Authority of the City of Lincoln, Nebraska, 2018).

Rent Reform #1, Interim Re-examinations, was implemented in 1999 to reduce interim rent re-calculations if income increased without a change in household composition. More permanent income decreases, on the other hand, have been addressed within 90 days of the change to reflect a decrease in required rent payments. Using a point in time data analysis system, the agency reports that “job changes or job losses for 61.4% of households and 68.5% of individual job changes did not result in a rent decrease,” suggesting that the reformed timeframe for interim recertifications motivates increases in earned income and pursuit of new employment in the event of job loss (The Housing Authority of the City of Lincoln, Nebraska, 2018, pg. 25).

Rent Reform #2, Minimum Earned Income (MEI), was implemented in 1999 as a basic expectation that work-able households are earning 25 hours per week at minimum wage, though other forms of income may be considered for the rent calculation. LHA noted that in FY2017-2018, “58% of households ended their MEI requirement through employment or participation in education or a self-sufficiency program. This outcome is a good indicator that the MEI requirement encourages people toward employment or toward education and training leading to employment” (The Housing Authority of the City of Lincoln, Nebraska, 2018, pg. 34). Benchmarks for increases in earned income and employment were generally met, despite the low unemployment rate. Less than 2% of voucher households and 0% of public housing tenants were evicted due to lack of rental payments, and the data did not indicate a disproportionate number of households with MEI were terminating assistance compared to other households.

Rent Reform #3, Rent Calculations, was implemented during 2008 annual re-examinations or new admissions to include a total tenant payment (TTP) of 27% of gross income with no allowable deductions, a minimum rent of \$25 per month or the TTP less the utility allowance for non-disabled heads of household, a 2% rate on assets equal to or greater than \$5,000, and a TTP Hardship policy. The simplified method of calculating rent has led to considerable reductions in agency costs, staff time, calculation errors, and stress on tenants. Hardship requests due to minimum rent requirements have declined steadily for both public housing and housing choice voucher households since 2009 (The Housing Authority of the City of Lincoln, Nebraska, 2018, pg. 55).

Rent Reform #4, Rent Choice, was revised in 2008 to limit the initial tenant rent portion at no more than 50% of monthly income, excluding utilities, and limits the tenant rent plus utilities to no more than 40% of adjusted income for voucher households. Compared to the traditional voucher, this reform allows

MTW Rent Choice households more options to move to higher opportunity/lower poverty neighborhoods by allowing greater, but not crippling, rent burden. Despite providing greater flexibility with rent-choice, some program benchmarks were not met in FY 2017-2018 due to a tighter rental market, decreased new admissions and transfers, and increased program payment standards. However, the agency did find that the “MTW Rent Choice families were much more likely to be dispersed in a wide range of census tracts than non-MTW families (29 to 3), and were less likely to choose housing in areas of minority or lower income concentrations” (The Housing Authority of the City of Lincoln, Nebraska, 2018, pg. 62), in part due to greater accessibility to Low Income Housing Tax Credit (LIHTC) properties in higher opportunity neighborhoods.

Rent Reform #5, Average Utility Allowances, was implemented in 1999 to standardize utility deductions based on household size and fair market rents. Hardship policies have been developed, in particular for households with Tenant Protection Vouchers or Enhanced Vouchers, to prevent displacement due to loss of HUD subsidy assistance or to allow families to remain in project units even if the rent increases. Compared to traditional utility allowance calculation methods, this utility standardization has been easier for users to understand, implement, and therefore has reduced calculation errors, staff time, and agency costs significantly. Task error rate decreased from 15% in 2010 to less than 1% in FY2017-2018, and cost decreased from \$62,474 for staff to calculate allowances and distribute reimbursement checks in 1999 to \$1,680 in FY2017-2018 under the reformed method. The reform also encourages tenants to find energy efficient units and/or units where utilities are covered by the landlord, and the standards make it clear to tenants what amount would be unsubsidized if the unit costs exceed stated allowances.

Rent Reform #6, Biennial Re-examinations, was implemented in 2009 as a cost-saving measure for both staff and tenants, particularly to reduce re-examination requirements for elderly or disabled heads of household to every two years, except where the interim re-examination policy applies. Work-able households still undergo an annual recertification process under this rent reform. LHA noted that the “data in our local metrics shows that we have reduced by approximately half the number of elderly and disabled reviews conducted per year. The average number of reviews in the combined programs is 732 reviews per year compared to the baseline number of 1,349 reviews representing 617 fewer reviews” (The Housing Authority of the City of Lincoln, Nebraska, 2018, pg. 69). Other benefits included reducing required staff, serving more families through specialized voucher programs (e.g. Veterans Affairs Supportive Housing), more quality time between staff and program participants, and applicant and participant access to a 12-hour tenant education series called Nebraska RentWise.

Louisville Metro Housing Authority (LMHA)

Around 2014, LMHA was selected by HUD to participate in a national rent reform study along with housing authorities in Lexington, KY, Washington, D.C., and San Antonio, TX, to be conducted by an independent, non-profit social policy research group called MDRC. LMHA sampled from work-able, MTW voucher households to develop a treatment group under a new rent policy compared with the traditional, control group policy. The alternate rent policy was first implemented in FY2015 to include a simplified income determination and rent calculation, a triennial income recertification policy with some exceptions, elimination of interim recertification requirements for most household status changes and moves, a minimum rent of \$50, and a simplified utility allowance determination. From FY2015 to FY2016, LMHA reported its benchmark progress according to HUD Standard Metrics, though these are separate from MDRC findings.

From FY2015 to FY2016, LMHA did achieve specific benchmarks related to staff and client cost savings in terms of reducing the costs per annual and interim certification, costs to calculate rent, and the costs to determine income from assets for the alternate rent group. Similarly, staff time savings were achieved in terms of time needed to complete annual certifications, and time needed to determine tenant rent and utility allowances. Households from both the treatment and control groups were removed from TANF at the rate expected, received anticipated levels of self-sufficiency services, and the agency observed a per unit decrease in housing subsidies received. Roughly a quarter of the alternate rent and control groups were transitioned to self-sufficiency in this time as well. The agency noted that “ten hardship requests were received during FY 2016. In seven cases, the family’s Total Tenant Payment was re-calculated as a result of the request. Three requests were denied” (Louisville Metro Housing Authority, 2016, pg. 54).

Minneapolis Public Housing Authority (MPHA)

MPHA has instituted a few rent reforms, including the HCV Rent Reform in FY2014. This initiative involves a simpler, flat subsidy based on household income, utility allowance, disability status, and number of bedrooms; a minimum rent; a 40% affordability cap with some exceptions; revised existing policies on asset verification and calculation; limits to interim re-examinations; working family incentives; changes in fair market rents; a revised portability policy; and a 10% subsidy deduction for families with a mixed immigration status. The FY2017 report noted that agency “expenses continued to decrease (down 12 percent in 2017) while participants experienced gains across the components of self-sufficiency (including a 13 percent increase in earned income)” (Minneapolis Public Housing Authority, 2018, pg. 24). Due to a higher than expected error rate in calculating income, MPHA created a Continuous Improvement Team and added a Quality and Technical Specialist to modify staff training and identify ways to improve the accuracy of the process.

During FY2017, the rent reform resulted in an increase in average earned income, with 62% of work-able households having a head of household with earned income, as well as a significant decrease in families receiving TANF. Forty-four households transitioned to self-sufficiency through payment of the full contract rent. However, a rising rental market meant that average per unit housing subsidies did not decrease as anticipated. Interestingly, MPHA also implemented an earned income exclusion of 15% for working families with minor children as a targeted work stabilization measure, beginning in 2011. The agency noted:

MPHA had good results with this initiative during 2017. The average income of those employed increased, while... the number of households employed increased. At the end of 2017, there were 1,554 public housing households with earned income, an increase of 4.2% over 2016, while the average earned income of those households increased to \$24,857 [from \$15,970]. MPHA had no requests for hardship under this initiative in 2017. For those families who continued work, this activity increased the working family’s level of income and enhanced the likelihood that the family would achieve a livable wage and move toward self-sufficiency. [However], there was a financial impact on the low-rent program for 2017, because the reduction in Adjusted Gross Income due to the 15% allowance reduces the amount of rent paid; due to a proration in subsidy, MPHA experienced a loss of subsidy. (Minneapolis Public Housing Authority, 2018, pg. 41)

The Housing Authority of Columbus, GA (TACG)

Beginning in FY 2014, TACG initiated a rent reform control-treatment study between two RAD properties. The reform activity “measures whether increased minimum rent, a lower calculated rent percentage, and the provision of work incentives influences unemployed families to return to the workforce” (The Housing Authority of Columbus, Georgia, 2018, pg. 4). Additional conditions of tiered rent and financial assistance for chronically unemployed families as well as increased presence of the Family Self-Sufficiency (FSS) program further distinguish the treatment property from the control. Residents at either location had completed a survey administered by the Columbus State University during the demonstration.

While promotion of financial incentives and implementation of the tiered rents had not been achieved as anticipated, no hardship requests had resulted due to the increase in minimum rent from \$50 to \$100. Unemployed residents had also reported earned income at annual recertifications. The baseline average earned income of households prior to treatment was \$12,530, whereas actual average earned income was \$15,782 following treatment in FY 2017, with an increase of 14 employed households. However, the control group demonstrated a similar increase in income and employment, from \$13,697 to \$16,641, and 12 households, respectively. Yet full-time employment decreased for the control group by 4.4%, whereas it increased by 2.1% for the treatment group.

Similarly, part-time employment decreased slightly for the control group, though it increased slightly for the treatment group. In the same time period, unemployment dropped by 24% in the treatment households with work-able members, whereas the control group experienced a slight increase in unemployment. For the metrics not adequately achieved, such as an increase in the number of families transitioned to self-sufficiency based on employment and the tiered rent incentive, likely causes include an unfavorable local economy, HACG’s pending portfolio conversion and planned redevelopment (The Housing Authority of Columbus, Georgia, 2018).

Vancouver Housing Authority (VHA)

VHA implemented a minimum income rent reform in 2013 with 69 households transitioning to self-sufficiency by the end of FY2016, with a modified increase to the minimum anticipated for 2017. “The percentage of work-able households reporting earned income continued to increase in 2016. In addition, the average amount of that earned income also continues to increase significantly. The \$514,085 in cost savings is determined from the decrease in HAP expense caused by the imputed income amounts added to the income of those not generally reporting earned income” (Vancouver Housing Authority, 2017, pg. 28). As noted in FY2016, the agency experienced over half a million dollars in HAP cost savings, an increase in average earned income of \$4,000, increases in full- and part-time employment and enrollment in education, a reduction in households receiving TANF, an increase in tenant rent share, and a roughly 9% increase in work-able households reporting earned income/wages. Benchmarks not achieved included a decrease in unemployment, job training, per unit subsidy costs, and an increase of households transitioning to self-sufficiency.

The agency also enacted a 33% Household Share Rent Reform in FY2015, where Total Tenant Payment (TTP) is calculated as the highest of a) 33% of the household’s monthly adjusted income, b) 33% of the household’s monthly minimum income, c) 10% of the household’s monthly gross income, or d) the VHA established minimum rent of \$50 (Vancouver Housing Authority, 2017, pg. 16). The reform also provides greater flexibility in housing choice by increasing the maximum household share towards rent from 40% of household adjusted monthly income to 50%. In FY2016, the agency observed cost savings, an increase in availability of over 100 housing units, and a proportionate drop in months on the waiting list from 102

to 5 months. Overall, the agency noted that its “two major rent reform activities reduced potential housing assistance expense by an estimated 1.4 million dollars; enough funds to subsidize an additional 200 households” (Vancouver Housing Authority, 2017, pg. 5).

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Appendix B



FAIRFAX
COUNTY

FAIRFAX COUNTY
REDEVELOPMENT AND HOUSING
AUTHORITY

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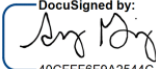
V I R G I N I A

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Certification of Statutory Requirements FCRHA Moving to Work FY 2022 Report

The Fairfax County Redevelopment and Housing Authority certifies that it has met the three statutory requirements set forth under its Moving to Work agreement of:

1. Assuring that at least 75 percent of the families assisted by the Agency are very low-income families;
2. Continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and
3. Maintaining a comparable mix of families (by family size) that are served, as would have been provided had the amounts not been used under the demonstration.

DocuSigned by:

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Amy Ginger, Assistant Secretary, FCRHA

09/29/2023 | 07:39:07 EDT

Date