

# PHA Name : Grand Rapids Housing Commission

**PHA Code :** MI073

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 7/1/2024

**PHA Program Type:** Combined

**MTW Cohort Number:** Asset Building

**MTW Supplement Submission Type:** Annual Submission

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

The Grand Rapids Housing Commission (GRHC) provides affordable housing opportunities and related services to lower-income families, people with disabilities, and senior citizens in a manner that is fiscally sound and in ways that support families, neighborhoods, and economic self-sufficiency. As one of the largest providers of housing assistance in its jurisdiction, the GRHC strives to be an innovative, progressive, high performing PHA that focuses on excellence, customer service, and community-based strategies to enhance quality of life.

The GRHC remains committed to pursuing the three key statutory objectives of the Moving to Work (MTW) program in the coming fiscal year. The GRHC recognizes that creating impactful programming for low-income families requires an in-depth understanding of local context. As such, the GRHC will continue to use MTW flexibilities to create assistance programs, landlord and development partnerships and supportive service initiatives from an on-the-ground perspective.

Planned initiatives include working with a provider of support services for returning citizens to include housing resources, allowing project-based vouchers to be utilized on manufactured homes and shared housing, and the expansion of the biennial reexaminations to include the entirety of the housing choice voucher (HCV) portfolio. The GRHC will continue to focus in its second year on reducing expenditures, maximizing utilization in its Voucher portfolio including PBVs, incentivizing landlords, and asset building. By reducing the administrative burdens tied to contracting third parties to inspect, conduct rent-reasonableness, reducing annual reexaminations to a biennial schedule, and removing the selection process for PBV awards for GRHC owned projects, the GRHC will reduce expenditures. Additionally, incentivizing landlords by providing vacancy loss payments, pre-qualifying inspections, and offering alternative inspection schedules will increase housing choice for assisted families.

The GRHC was selected to implement a PHA - Designed Asset Building initiative. Our PHA - designed asset building initiative will lead to strengthened household stability through savings, increased credit worthiness, and positive role modeling for our youth who will also be eligible to participate in the initiative. The GRHC will provide direct deposits to HCV assisted households to increase savings and believe that simply opening a savings account, depositing funds, and interacting with a financial institution will lead to greater financial stability for program participants when life altering events occur (paying rent vs. paying car repair), and increasing opportunities to improve credit worthiness. The GRHC will also use lessons learned from our successful FSS and homeownership programs to guide successful activities of the Asset Building program. Components of our program include the following:

- The GRHC will identify households that have youth between the ages of 13 and 18.
- The GRHC will identify a selection process to participate in the savings program. A total of 25 households will be selected. No contract of participation will be required for participation in the savings program
- Households do not need to be participating in GRHC's FSS program to participate in this savings program
- The number of contributions is not tied to income and will be made whether or not there is a corresponding increase in the participant contribution.
- Participants may opt-out of this activity at any time.
- Each participating head of household will receive a monthly deposit of \$50.00
- Youth of participating head of households, ages 13-18 are eligible to participate in the savings program (up to 3 per household) and will receive a monthly deposit of \$25.00.
- Funds will be provided in the form of a savings account that will accrue for two (2) years or until the account reaches \$5,000.00.
- Head of household participants may deposit additional amounts that will be matched by the GRHC on an annual basis of up to \$1,000 per year for two (2) years.
- Youth participants may deposit additional amounts that will be matched by the GRHC on an annual basis of up to \$500 per year for two (2) years.
- Participants must let the funds accumulate in the account for at least two (2) years before they can access the funds unless the participant demonstrates an urgent need.
- Each participant must agree to open a savings account with a partnering financial institution and will be offered educational opportunities around banking, saving and financial management.
- The GRHC has additionally added an additional 25 families as part of HUD's Opt-Out savings program. the GRHC for this program will not match or provide youth accounts.

With careful consideration of our participant/resident households, the GRHC has elected to undertake initiatives that support the MTW Statutory Objectives of:

- Reduce cost and achieve greater cost effectiveness in federal expenditures; and
- Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- To increase housing choices for low-income families.

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

| <b>1. Tenant Rent Policies</b>                                |  |
|---|--|
| a. Tiered Rent (PH)   | Not Currently Implemented                |
| b. Tiered Rent (HCV)  | Not Currently Implemented                |
| c. Stepped Rent (PH)  | Not Currently Implemented                |
| d. Stepped Rent (HCV)   | Not Currently Implemented                |
| e. Minimum Rent (PH)  | Not Currently Implemented                |
| f. Minimum Rent (HCV)   | Not Currently Implemented                |
| g. Total Tenant Payment as a Percentage of Gross Income (PH)  | Not Currently Implemented                |
| h. Total Tenant Payment as a Percentage of Gross Income (HCV) | Not Currently Implemented                |
| i. Alternative Utility Allowance (PH)                         | Not Currently Implemented                |
| j. Alternative Utility Allowance (HCV)                        | Not Currently Implemented                |
| k. Fixed Rents (PH)   | Not Currently Implemented                |
| l. Fixed Subsidy (HCV)  | Not Currently Implemented                |
| m. Utility Reimbursements (PH)                                | Not Currently Implemented                |
| n. Utility Reimbursements (HCV)                               | Not Currently Implemented                |
| o. Initial Rent Burden (HCV)                                  | Not Currently Implemented                |
| p. Imputed Income (PH)  | Not Currently Implemented                |
| q. Imputed Income (HCV)                                       | Not Currently Implemented                |
| r. Elimination of Deduction(s) (PH)                           | Not Currently Implemented                |
| s. Elimination of Deduction(s) (HCV)                          | Not Currently Implemented                |
| t. Standard Deductions (PH)                                   | Not Currently Implemented                |
| u. Standard Deductions (HCV)                                  | Not Currently Implemented                |
| v. Alternative Income Inclusions/Exclusions (PH)              | Not Currently Implemented                |
| w. Alternative Income Inclusions/Exclusions (HCV)             | Not Currently Implemented                |
| <b>2. Payment Standards and Rent Reasonableness</b>           |  |
| a. Payment Standards- Small Area Fair Market Rents (HCV)      | Not Currently Implemented                |
| b. Payment Standards- Fair Market Rents (HCV)                 | Not Currently Implemented                |
| c. Rent Reasonableness – Process (HCV)                        | Not Currently Implemented                |
| d. Rent Reasonableness – Third-Party Requirement (HCV)        | Currently Implementing                   |
| <b>3. Reexaminations</b>                                      |  |
| a. Alternative Reexamination Schedule for Households (PH)     | Plan to Implement in the Submission Year |
| b. Alternative Reexamination Schedule for Households (HCV)    | Plan to Implement in the Submission Year |
| c. Self-Certification of Assets (PH)                          | Plan to Implement in the Submission Year |
| d. Self-Certification of Assets (HCV)                         | Plan to Implement in the Submission Year |
| <b>4. Landlord Leasing Incentives</b>                         |  |
| a. Vacancy Loss (HCV-Tenant-based Assistance)                 | Currently Implementing                   |
| b. Damage Claims (HCV-Tenant-based Assistance)                | Not Currently Implemented                |
| c. Other Landlord Incentives (HCV- Tenant-based Assistance)   | Currently Implementing                   |
| <b>5. Housing Quality Standards (HQS)</b>                     |  |
| a. Pre-Qualifying Unit Inspections (HCV)                      | Currently Implementing                   |
| b. Reasonable Penalty Payments for Landlords (HCV)            | Not Currently Implemented                |
| c. Third-Party Requirement (HCV)                              | Currently Implementing                   |
| d. Alternative Inspection Schedule (HCV)                      | Plan to Implement in the Submission Year |
| <b>6. Short-Term Assistance</b>                               |  |
| a. Short-Term Assistance (PH)                                 | Not Currently Implemented                |
| b. Short-Term Assistance (HCV)                                | Not Currently Implemented                |
| <b>7. Term-Limited Assistance</b>                             |  |
| a. Term-Limited Assistance (PH)                               | Not Currently Implemented                |
| b. Term-Limited Assistance (HCV)                              | Not Currently Implemented                |
| <b>8. Increase Elderly Age (PH &amp; HCV)</b>                 |  |
|   |  |

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

### C. MTW Activities Plan that Grand Rapids Housing Commission Plans to Implement in the Submission Year or Is Currently Implementing

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

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

The GRHC will no longer require a third party to conduct rent reasonableness tests at PBV properties that the GRHC owns, manages, or controls. The GRHC will follow the rent reasonableness process used for all other properties and conduct the test using an online service. These tests will be subject to GRHC's voucher program quality control processes.

Requiring approval from a 3rd party increases costs, creates potential delays in the availability of needed housing units, and requires an additional expenditure for completion. By utilizing the same mechanism utilized by the tenant-based programs in the GRHC portfolio, this achieves greater cost-effectiveness in federal expenditures, improves administrative efficiencies, and reduces the response time for conducting rent reasonableness analysis. This activity contributes to supporting the MTW statutory goal of reduce cost and achieve greater cost effectiveness in federal expenditures.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

The GRHC now utilizes the HCV process for rent reasonableness for its PBV owned developments. This has reduced the administrative cost of procuring a third-party to perform a rent study. The GRHC in this upcoming fiscal year will be utilizing a new software provider that utilizes up to date data reflective of the current market.

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

No

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

The GRHC will adhere to the quality control and quality assurance process utilized for the HCV program. The HCV Manager will perform quality assurance checks on 10% of the Rent Reasonableness calculations performed during the fiscal year.

No document is attached.

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

The GRHC utilizes an online interface where staff enters information and the system provides data based on the HUD requirements that take into consideration various factors when determining rent comparability including:

- Location and age
- Unit size including the number of rooms and square footage of rooms
- The type of unit including construction type (e.g., single family, duplex, garden, low-rise, high-rise)
- The quality of the units including the quality of the original construction, maintenance and improvements made
- Amenities, services, and utilities included in the rent

The GRHC may use these factors to make upward or downward adjustments to the rents of comparison units when the units are not identical to the HCV-assisted unit.

Comparable units must represent unrestricted market rents. Therefore, units that receive some form of federal, state, or local assistance that impose rent restrictions cannot be considered comparable units. These include units assisted by HUD through any of the following programs: Section 8 project-based assistance, Section 236 and Section 221(d)(3) Below Market Interest Rate (BMIR) projects, HOME or Community Development Block Grant (CDBG) program assisted units in which the rents are subsidized; units subsidized through federal, state, or local tax credits; units subsidized by the Department of Agriculture rural housing programs, and units that are rent-controlled by local ordinance.

#### GRHC RENT REASONABLENESS METHODOLOGY

The GRHC will primarily utilize online software to collect and maintain data on market rents in the GRHCs jurisdiction. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes, census tract, neighborhood, and identifiable natural or man-made boundaries. The data will be updated on an ongoing basis and rent information that is more than 12 months old will be eliminated from the database.

The first step in preparation concerns the location characteristic. Location has the greatest impact on rent. Therefore, this system gives the greatest weight to location. To define location, the online software divides the Agency's jurisdiction into three rental market value areas. Each unit is to be assisted and each comparable unit is assigned to be in either a high, medium, or low rental market value location.

The online software assigns maximum value points to each HUD required characteristic. These value points represent the economic value for each characteristic. Each characteristic is assigned a value point level. Characteristics with higher levels have more impact on the actual rent. Level V has the highest number of potential value points. Level I have the lowest number of potential points. Each level has a value point range. The actual number of value points assigned to a characteristic is determined by the description of each characteristic in a particular unit. For example, for the quality characteristic, a unit with high quality will receive more value points than a unit with fair quality. In situations where the landlord submits comparable units for assessment, GRHC staff will enter the units into the online software for scoring. The

table attached provides value levels and point ranges.

This document is attached.

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

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

For PH Programs, the GRHC will decrease the frequency of reexaminations from annual to biennial for all families. The alternative reexamination schedule supports the MTW goal of creating activities that are cost effective; this is attained by a reduction in staff time and operational costs. It is expected, due to the reduction in staff time in completing recertifications, GRHC staff will be able to further assist families in their housing search and endeavors in self-sufficiency.

In conjunction with the biennial reexaminations, the GRHC will limit Interim Recertifications (IR) to decreases of income that are greater than 10% of the family/household's annual gross income and/or household composition changes.

Residents may request a hardship exemption to waive the MTW activity.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

**admissions and currently assisted households?**

New admissions and currently assisted households

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

The MTW activity applies to all family types

**Does the MTW activity apply to all public housing developments?**

The MTW activity applies to all developments

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

Due to limitations around the software being utilized by the GRHC to select elderly families on fixed income, implementation of this activity had to be revised. The GRHC believes that by expanding this waiver to all families will further reduce expenditures and allow maximized use of its software.

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

Yes

This document is attached.

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

Yes

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

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

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

No

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

No hardship were requested in the most recent fiscal year.

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

No

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

Yes

This document is attached.

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

Yes

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

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

**What is the recertification schedule?**

Once every two years

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

2 or more

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

The GRHC will complete interim recertifications for composition changes. It will also allow families to submit requests through its hardship policy to address circumstances that would require a change in rent calculation (i.e. medical expenses). The GRHC is committed to ensure that families/households are not negatively impacted under the alternative reexamination schedule.

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

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

For HCV Programs, the GRHC will decrease the frequency of reexaminations from annual to biennial for all families in the HCV Portfolio. The alternative reexamination schedule supports the MTW goal of creating activities that are cost effective; this is attained by a reduction in staff time and operational costs. It is expected, due to the reduction in staff time in completing recertifications, GRHC staff will be able to further assist families in their housing search and endeavors in self-sufficiency.

In conjunction with the biennial reexaminations, the GRHC will limit Interim Recertifications (IR) to decreases of income that are greater than 10% of the family/household's annual gross income and/or household composition changes.

Residents may request a hardship exemption to waive the MTW activity.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

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

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

This activity applies to all Tenant-based and Project-based vouchers.

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

Due to limitations around the software being utilized by the GRHC to select elderly families on fixed income, implementation of this activity had to be revised. The GRHC believes that by expanding this waiver to all families will further reduce expenditures and allow maximized use of its software.

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

Yes

This document is attached.

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

Yes

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

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

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

No

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

No hardship were requested in the most recent fiscal year.

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

No

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

Yes

This document is attached.

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

Yes

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

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

**What is the recertification schedule?**

Once every two years

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

2 or more

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

The GRHC will complete interim recertifications for composition changes. It will also allow families to submit requests through its hardship policy to address circumstances that would require a change in rent calculation (i.e. medical expenses). The GRHC is committed to ensure that families/households are not negatively impacted under the alternative reexamination schedule.

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

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

The GRHC will allow participants to self-certify their assets up to \$50,000. This waiver will improve cost effectiveness in reducing administrative burden while still maintaining the integrity of the rent calculation process. The Self-Certification of Assets activity supports the MTW and GRHC goal of creating activities that are cost effective. This is attained by a reduction in staff time when processing paperwork, which unfortunately is difficult to attain at times.

Staff spends onerous amounts of time verifying assets that routinely do not affect participants' rent portions. The GRHC estimates that verifying assets take per program participant (requesting and processing) approximately 20 minutes. By allowing families to self-certify, the GRHC estimates at minimum a saving of 1,400 hours or \$52,332 in costs per year (calculation utilizes a newly hired HCV coordinator). It is expected, due to the reduction in staff time, GRHC staff will be able to further assist families in their housing search and endeavors in self-sufficiency.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

The GRHC is still in process of implementing this activity in this fiscal year. Additionally, it also reviewing the implications of HOTMA on this activity.

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

No

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

\$50,000.

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

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

The GRHC will allow participants to self-certify their assets up to \$50,000. This waiver will improve cost effectiveness in reducing administrative burden while still maintaining the integrity of the rent calculation process. The Self-Certification of Assets activity supports the MTW and GRHC goal of creating activities that are cost effective. This is attained by a reduction in staff time when processing paperwork, which unfortunately is difficult to attain at times.

Staff spend onerous amounts of time verifying assets that routinely do not affect participants' rent portions. sufficiency.

The GRHC estimates that verifying assets take per program participant (requesting and processing) approximately 20 minutes. By allowing families to self-certify, the GRHC estimates a saving of 1,400 hours or \$52,332 in costs per year at a minimum (calculation utilizes a newly hired HCV coordinator).

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

The GRHC is still in process of implementing this activity in this fiscal year. Additionally, it also reviewing the implications of HOTMA on this activity.

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

No

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

\$50,000.

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

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

The GRHC in its effort to increase and support housing choice, will implement a vacancy claim program. This activity addresses the MTW goal of housing choice and the GRHC goal of incentivizing landlords to participate in its programs. By increasing the number of landlords participating in the tenant-based programs, will provide more choices in housing for participants and improve the success rate of participants leasing up. The GRHC will offer a vacancy loss payment worth one (1) month's contract rent, payable upon execution of a new HAP contract with the GRHC. If the unit is vacant for less than a full month, the payments will be prorated based on the number of days the unit is vacant.

This activity's purpose is to incentivize and increase retention of current participating landlords and attract new landlords into the tenant-based programs. These incentives may minimize the risk of monetary loss when a unit is vacant, influence landlords to work with applicants/clients searching for housing, help landlords become more willing to hold units for voucher participants, reduce the lease up time and reduce the GRHC large waiting list. It is expected as units become leased, increases in utilization and administrative fees will occur allowing for future programming in support of

self-sufficiency for participants.

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

Housing choice

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

Increased revenue; Increased expenditures

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

**assisted households?**

The MTW activity applies to all assisted households

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

The GRHC has marketed the availability of the vacancy loss payments to its landlords as part of the landlord incentive program. We expect that increased usage of this option will increase in the following months.

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

No

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

To all units

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

Up to one month of unit rent.

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

0

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

\$0

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

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

The GRHC in efforts to incentivize and increase landlord participation in its tenant-based assistance programs will further expand its Landlord Incentive program. These incentives assist in the MTW and GRHC goals of increasing housing choice for participants and increasing landlord participation. The incentives are as follows:

- New landlords receive \$1,000 dollars after an executed HAP contract.
- Returning landlords that have not signed a HAP contract for more than 12 months; receive \$1,000 after an executed HAP contract.
- Current participating landlords, receive \$500 per new unit that has an executed HAP contract, up to a three (3) units per year maximum.
- A referral bonus of \$200 to current participating landlords for each new landlord that executes a HAP contract. Limited to up to 5 Referrals.
- Non-monetary incentives including:
  - o Landlord portal
  - o Landlord workshops and outreach – for current and new landlords.
  - o Streamlining the inspection process - using reminder software specific automations.
  - o A landlord liaison - streamlining the landlord's on-boarding process and serve as a single point of contact.

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

Housing choice

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

Increased revenue; Increased expenditures

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

The MTW activity applies to all assisted households

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

The GRHC has marketed the availability of the landlord incentive program. We have had major success in the use of the incentives to attract new landlords and units to the HCV program. The GRHC will continue to incentivize landlords to onboard new units and other landlords to participate in the HCV program.

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

No

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

To all units

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

Up to \$3,500

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

0

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

\$0

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

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

The GRHC will offer pre-qualifying inspections for units in its jurisdiction. Passing pre-qualifying inspections will be valid for 90 days from the passed inspection date. Participants will be able to request an interim inspection after moving in. The goal of these inspections is to lessen the time it takes for a voucher holder to move into a unit and encourage participation from new landlords. New landlords can understand the current HUD inspection standards through a pre-qualifying inspection, quickly make their repairs, and then be ready for a voucher holder tenant. The voucher holder will be able to move into the unit faster due to not waiting on an inspection, which may fail the first time and take more time to pass a re-inspection. Additionally, landlords will decrease their vacancy time and income lost.

The pre-qualifying unit inspections are part of a larger landlord incentive initiative to increase the supply of affordable housing and maintaining a positive relationship with landlords. Pre-qualifying unit inspections will shorten the timeframe landlords must wait during the Request for Tenancy Approval and normal inspection process (a deterrent for some landlords) and ensure more quality units are available to voucher holders.

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

Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

The GRHC continues to offer this option to landlords in its HCV Program. The GRHC will continue to market to the availability of this option to landlords.

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

No

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

The pre-inspection is valid for 90 days.

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

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

The GRHC will no longer require a third party to conduct inspections at PBV properties that the GRHC has an interest in. The GRHC will follow the inspection process utilizing the current HUD inspection method that is used for all other properties (HQS or NSPIRE). The inspections will be subject to GRHC's voucher program quality control process. Participants will also be able to request an interim inspection or review by a supervisor at any time if they feel an inspection need was not met.

Requiring approval from a third party increases administrative costs, due to the need to contract an external party. Conducting these inspections in house will achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for participants, and improve the response time for conducting inspections. This waiver contributes to our larger initiative of promoting project-based voucher efficiency by no longer requiring third parties to conduct rent reasonableness tests and inspections for PBV properties that the GRHC has an interest in.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

The GRHC has recently commenced inspecting its own PBV units. At the end of FY24 the GRHC will analyze the cost effectiveness of this activity.

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

No

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

Following will explain the quality assurance method

The GRHC will adhere to the quality control and quality assurance process utilized for the HCV program. The HCV Manager/Supervisor will perform quality assurance inspections on 10% of the inspections performed during the current fiscal year.

No document is attached.

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

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

Through the combined MTW activities 4.a. Vacancy Loss Payment, and 4.c. Other Landlord incentives, the GRHC will implement activities that encourage owner participation in the HCV program. The GRHC will inspect assisted units of eligible households once every two years for landlords that have passed their initial inspection and continue to pass their biennial inspections. Eligible households and participating landlords may request interim (special/complaint) inspection at any time during the term of the HAP contract.

The GRHC will comply with HQS inspection standards as found at 24 CFR 982.401. The GRHC will inspect assisted units at any time for health and safety, as well as accessibility purposes. The goal of this activity is to increase the number of participating owners, expand housing opportunities for participants, and retain landlord participation in the HCV program. This activity combined with HAP direct deposits, Pre-HQS inspections, vacancy loss payments, and bonus payments are intended to increase and retain landlord participation. This activity will also reduce operational costs by reducing the amount of HQS inspections to occur per year by 50%.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

The GRHC is still in the process of implementing this activity.

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

No

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

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

The GRHC will increase the PBV Program Cap up to 50% of its housing choice authorized units for project-based vouchers. It is our goal to leverage LIHTC awards and work with for-profit and non-profit developers, local units of government and housing providers to meet the community's demand for affordable housing and avoid displacing residents. Currently, the county's projected need for 2025 is 9,000 units of which 50% are needed for low-income households. This activity will expand housing choice for families in GRHC Programs by adding additional subsidized units.

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

Housing choice

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

Increased revenue

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

The MTW activity applies to all assisted households

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

The GRHC has awarded 123 Project based vouchers in the last fiscal year. It will continue to partner with nonprofit developers to meet the housing demand in its jurisdiction.

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

No

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

50.00%

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

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

The GRHC will increase the PBV Project Cap up to 100% of the project units. It is our goal to leverage LIHTC awards and work with for-profit and non-profit developers, local units of government, and housing providers to meet the community's demand for affordable housing and avoid displacing residents. Currently, the county's projected need for 2025 is 9,000 units of which 50% are needed for low-income households. This will support the GHRC and MTW goal of increasing housing choice for families that are assisted.

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

Housing choice

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

Increased revenue

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

The MTW activity applies to all assisted households

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

The GRHC in its last RFP for PBV increased the percentage of vouchers per project to be the lesser of 35 vouchers or 50% of the total units in a project. The GRHC will continue to analyze the current need of the local community and adjust its RFP to meet that need.

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

No

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

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

The GRHC will utilize the elimination of PBV Selection Process for PHA-owned Projects without improvement, development, or replacement in order to reduce costs associated with the RFP process. This process requires a significant amount of staff time to prepare the RFP, receive and organize proposals for review, score proposals, notify developers of the outcome, track awards until execution of contract, and 3rd party costs associated with their efforts. This would allow the GRHC to award vouchers without the RFP to units in the GRHC's portfolio that qualify for PBV after conducting a Subsidy Layering Review, ensuring the property is compliant with HUD's site selection requirements, and conduct HQS inspections of the units. This waiver would increase cash flow stability for the project brought about by PBVs. This will support the GRHC and MTW goals of increasing housing choice for families that are assisted by increasing availability and choice of units.

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

Cost effectiveness; Housing choice

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

Increased revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

The GRHC has not implemented this activity and is currently evaluating the conversion of Hope Community to a PBV development.

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

No

**9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)**

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

The severe shortage of affordable rental homes in our jurisdiction has substantially limited housing choice for low-income families. Long waiting lists for assisted units signify intense demand, yet development of new affordable properties rarely keeps pace with need. To help close this gap, our agency will tap into MTW flexibility to boost housing supply and mobility through expanding housing choice. To help address this pressing issue limiting housing choice, the GRHC will utilize MTW flexibilities to allow manufactured homes and shared housing developments to receive project-based vouchers. This flexibility supports the GRHC's commitment to actualizing housing choice for all families in our community, regardless of income level or background. By targeting supply, leveraging markets and incentivizing participation, our MTW strategies aim to open doors to neighborhoods with opportunities too long denied to the households we serve. The flexibility to innovatively address inadequate affordable inventory provides a meaningful lever for expanding access, equity and inclusion throughout the jurisdiction.

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

|   |
|---|
| Housing choice  |
| <b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>  |
| Neutral (no cost implications)  |
| <b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>  |
| The MTW activity applies to all assisted households   |
| <b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> |
| N/A, this activity will be implemented in the upcoming Fiscal Year.   |
| <b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b>   |
| No  |
| <b>How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?</b>   |
| 20  |
| <b>How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?</b>  |
| 0   |
| <b>How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?</b>   |
| 50  |
| <b>How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?</b>  |
| 0   |

|   |
|---|
| <b>9.g. - Increase PBV Rent to Owner (HCV)</b>  |
| <b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b>  |
| The GRHC would like to use HUD's published Fair Market Rents (FMR) to determine contract rent increases on an annual basis for PBVs utilized at its housing developments. This would eliminate the need to procure costly rent comparability studies to increase contract rents. FMRs and utility allowances identified by HUD and a third party have been providing a baseline for tenant-based housing for years and is utilized for HUD funded programs. Due to the cost of rent comparability studies, the GRHC must delay engaging a contractor over a span of five (5) years in order to recoup its capital outlay and thus strangle cash flows when they could be spent making improvements to the developments. This activity will support the GRHC in achieving the MTW goal of reducing cost and achieving greater cost effectiveness in federal expenditures. A Rent Reasonableness Test would also be employed to meet requirements of the Safe Harbor for this MTW Waiver. |
| <b>Which of the MTW statutory objectives does this MTW activity serve?</b>  |
| Cost effectiveness  |
| <b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>  |
| Increased revenue; Decreased expenditures   |

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

The MTW activity applies to all assisted households

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

The GRHC is currently implementing this activity in this current fiscal year. It will provide an analysis at the end of this fiscal year of the reduction in expenditures and increase in revenue.

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

No

### 17.a. - Rental Subsidy Programs

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

Lack of stable housing and supports after incarceration has contributed to high rates of homelessness and recidivism among returning citizens in our community. To address this pressing issue, our agency will utilize MTW flexibility to implement a program in partnership with a local organization that provides services to returning citizens. This MTW activity will provide flexible housing financial assistance and targeted wraparound services for returning citizens through a contracted partnership. Our agency will supply funding for rental subsidies, security deposits, and utilities costs to the partner, which will manage the housing assistance paired with reentry navigation, counseling, job training programs and transitional case management they already provide.

The goal of this MTW innovation is to improve reintegration outcomes by ensuring consistent housing stability in the crucial period following release from incarceration. Research shows former inmates who secure affordable homes and supports have higher employment levels, reduced recidivism and improved family reunification. This initiative aims to break the cycle of incarceration fed by systemic barriers. The housing stability and service bundle made possible through our MTW flexibility represents a key piece of this comprehensive effort to lower recidivism and homelessness rates. By braiding subsidy funds and support programming, we hope to open doors to new beginnings.

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

Housing choice

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

Increased expenditures

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

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

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

New admissions (i.e., applicants) only

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

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Other – another specifically defined target population or populations.

**If Other Selected in Previous Question: Please describe this target population in the text box.**

|  |
|--|
| Returning Citizens from Incarceration  |
| <b>Does the MTW activity apply to all public housing developments?</b><br>The MTW activity applies to specific developments  |
| <b>Which developments participate in the MTW activity?</b><br>This activity will only apply to the HCV Program.  |
| <b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b><br>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers  |
| <b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b><br>This activity will only apply to the HCV Program.  |
| <b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b><br>N.A., this program will be implemented in the upcoming fiscal year. |
| <b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b><br>No  |
| <b>Does the MTW activity apply to all LNT units/properties?</b><br>The MTW activity applies to specific units/properties   |
| <b>Describe which LNT units/properties participate in the MTW activity?</b><br>This activity will only apply to tenant-based assistance and not to any development or unit.  |

**Table 17.a.1 - For each third-party partner, please complete the information in the following table.**

| Third-party Partner | Type of Services the Partner Provides | # of Units Allocated to that Partner for the Fiscal Year |
|---------------------|---------------------------------------|--|
|---------------------|---------------------------------------|--|

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

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

|     |   |
|-----|---|
| E.2 | <p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b><br/>No</p> |
|-----|---|

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

| Federal Fiscal Year (FFY) | Total Operating Subsidy Authorized Amount | How Much PHA Disbursed by the 9/30 Reporting Period | Remaining Not Yet Disbursed | Deadline   |
|---------------------------|---|---|-----------------------------|------------|
| 2023                      | \$574,909                                 | \$574,909   | \$0                         | 2023-12-30 |
| 2024                      | \$568,921                                 | \$181,817   | \$387,104                   | 2024-12-31 |

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

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

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

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

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

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

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

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

| <b>H.</b>   | <b>Public Comment</b> |
|---|-----------------------|
| Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments. |                       |

| <b>I.</b>   | <b>Evaluations.</b> |
|---|---------------------|
| Yes - This table lists evaluations of Grand Rapids Housing Commission's MTW activities, including the names of evaluators and available reports |                     |

**Table I.1 - Evaluations of MTW Policies**

| <b>Title and short description</b>   | <b>Evaluator name and contact information</b>         | <b>Time period</b>                                    | <b>Reports available</b>                        |
|--|---|---|---|
| Asset Building -Opt-Out Savings - 25 families have been selected to opt out of a savings program. Each family is deposited \$50 a month for 2 years. the purpose of the study is to measure enrollment, eviction prevention, and growth of assets. | Abt Associates - Judy Geyer - Judy_Geyer@abtassoc.com | 2 years from the date of enrollment into the program. | No reports are available at this point in time. |



U.S. Department of Housing and Urban Development

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June 27, 2024

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SUBJECT: Notice of Annual PHA Plan Submission for Fiscal Year Beginning 7/1/2024 for Grand Rapids Housing Commission (MI073)

This letter is to inform you that the Grand Rapids Housing Commission's Annual PHA Plan and Moving to Work (MTW) Supplement for the Fiscal Year beginning July 1, 2024, is approved.

The Department's approval of this MTW Supplement to the PHA Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act as outlined by the MTW Operations Notice. In providing assistance to families under programs covered by this MTW Supplement to the PHA Plan, your PHA must comply with the rules, standards, and policies established in the MTW Supplement to the PHA Plan as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Operations Notice.

Documents relying upon the approved PHA Plan and MTW Supplement (i.e., Administrative Plan, Admission and Continued Occupancy Plan, etc.) should be updated to reflect those policies. Also, the approved PHA Plan and all required attachments and documents should be available for review and inspection at the PHA's principal office during normal business hours.

If you have any questions please contact Brandie Isaacson, Portfolio Management Specialist, at (313) 234-7356 or via e-mail at [brandie.m.isaacson@hud.gov](mailto:brandie.m.isaacson@hud.gov).

Sincerely,

Douglas C. Gordon  
Director  
Office of Public Housing

CC: Joseph Russell, MTW Desk Officer, [JOSEPH.R.RUSSELL@hud.gov](mailto:JOSEPH.R.RUSSELL@hud.gov)  
Monica Steimle, Board Chairperson, [msteimle@grhousing.org](mailto:msteimle@grhousing.org)

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/07/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Grand Rapids Housing Commission

MI073

**MTW PHA NAME**

**MTW PHA NUMBER/HA CODE**

*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).*

Lindsey Reames

Executive Director

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**

  
**SIGNATURE**

03/29/2024

**DATE**

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

**Grand Rapids Housing Commission**  
Moving to Work Hardship Policy

The Grand Rapids Housing Commission's (GRHC) Moving to Work (MTW) Hardship Policy will apply to the following activities: 3.a and 3.b Alternative Reexamination.

**Overview**

If a household under the MTW activity experiences a decline of less than 10% of their annual gross income, and are experiencing a hardship, or require an interim that is not related to an income reduction or household composition to address a hardship (i.e., increase in medical expenses), families may request an interim under this provision. Families must provide supporting evidence on how the MTW activity/activities has caused an undue burden and may include current expenses relate to childcare, health, transportation, and/or similar documents.

While the hardship request is under review, the GRHC will suspend the MTW activity/activities for the household, beginning the next month after the request, until the GRHC has determined if the request is warranted. If the GRHC determines a hardship exist, the GRHC will continue to provide the household an exemption from the MTW activity/activities for up to 90 days.

The GRHC will determine what constitutes a hardship and it will be defined but not limited to the following:

- The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items; and
- Such other situations and factors determined by the agency to be appropriate.

If the hardship request does not meet its hardship standards, the household must resume the MTW activity/activities, and the GRHC will collect any retroactive rent if applicable through a reasonable repayment agreement. Upon request, GRHC will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

**Grievance Procedures**

- All grievances shall be heard by the Housing Commission's Hearing Officer appointed to hear such matters.
- The Hearing Officer is empowered to rule on the grievance in the manner and in accordance with the time frames which are set forth in the Policy.
- Prior to initiating a formal grievance, the resident must seek to have the grievance resolved informally. The complaint must be in writing (email or mail) and submitted to the GRHC within fifteen (15) calendar days from the date when the grievance arose.
- The informal discussion must be held within seven (7) calendar days and there must be an attempt to resolve the complaint without a formal hearing.
- A summary of the discussion shall be prepared by the GRHC within fifteen (15) days after the discussion.
- If the resident disagrees with the decision of the informal discussion the resident can file a request for a Grievance Hearing.

**Grievance Hearing**

- The resident shall be entitled to a fair and private hearing and may be represented by legal counsel, or another person chosen as a representative.
- The GRHC will adhere to the informal hearing procedures stipulated in Chapter 16 Part III of its Housing Choice Voucher Administrative Plan.
- At the hearing the resident should show why the GRHC's proposed action is improper.

- The burden of proof will then be on the GRHC to justify the action or inaction proposed by it.
- The decision of the Hearing Officer shall be based solely and exclusively upon the facts and documents presented at the hearing.
- The decision shall be issued in writing within fifteen (15) calendar days after the hearing. The decision of the Hearing Officer shall be binding upon the parties unless such decision violated Federal Regulations or the Grievance Policy. Should this be the case, the decision will be amended.
- The Final Decision can be appealed to the Executive Director within seven (7) calendar days. The Executive Director will issue a written decision within a reasonable period after consideration of the appeal.

DRAFT

| Characteristic | Value Point Level | Value Point Range |
|----------------|-------------------|-------------------|
|----------------|-------------------|-------------------|

|          |   |       |
|----------|---|-------|
| Location | V | 15-23 |
|----------|---|-------|

|             |    |              |
|-------------|----|--------------|
| HQS Quality | IV | <b>10-18</b> |
|-------------|----|--------------|

|                             |    |      |
|-----------------------------|----|------|
| Utilities Provided by Owner | IV | 0-18 |
|-----------------------------|----|------|

|                                |    |              |
|--------------------------------|----|--------------|
| Building Structure (Unit Type) | IV | <b>10-18</b> |
|--------------------------------|----|--------------|

|                   |     |             |
|-------------------|-----|-------------|
| Overall Unit Size | III | <b>8-13</b> |
|-------------------|-----|-------------|

|                    |    |     |
|--------------------|----|-----|
| Number of Bedrooms | II | 4-9 |
|--------------------|----|-----|

|                     |    |     |
|---------------------|----|-----|
| Number of Bathrooms | II | 4-9 |
|---------------------|----|-----|

|     |    |     |
|-----|----|-----|
| Age | II | 4-9 |
|-----|----|-----|

|           |    |     |
|-----------|----|-----|
| Amenities | II | 0-9 |
|-----------|----|-----|

|             |   |     |
|-------------|---|-----|
| Maintenance | I | 1-5 |
|-------------|---|-----|

|                  |   |     |
|------------------|---|-----|
| Housing Services | I | 0-5 |
|------------------|---|-----|

**The Grand Rapids Housing Commission received no public comments during the public comment period. For this reason, the GRHC did not proceed with an analysis of comments.**

## **COHORT 5.1. Opt-Out Savings Account**

The agency is authorized to provide funds to assisted households with the goal of increasing savings of assisted households.

### **Option Selected**

The GRHC has selected to implement option C – PHA Designed Asset Building Option.

### **Program Description**

Our PHA - designed asset building initiative will lead to strengthened household stability through savings, increased credit worthiness, and positive role modeling for our youth who will also be eligible to participate in the initiative. The GRHC will provide funds to HCV assisted households with the goal of increasing savings for our program participants and believe simply opening a savings account, depositing funds, and interacting with a financial institution will lead to greater financial stability when life altering events occur (paying rent vs. paying car) and opportunities to increasing credit worthiness. The GRHC will also use lessons learned from our successful FSS and homeownership programs to guide successful activities of the Asset Building program. Components of our program include the following:

- The GRHC will identify households that have youth between the ages of 13 and 18.
- The GRHC will identify a selection process to participate in the savings program. A total of 25 households will be selected.
- No contract of participation will be required for participation in the savings program
- Households do not need to be participating in GRHC's FSS program to participate in this savings program
- The number of contributions is not tied to income and will be made whether or not there is a corresponding increase in the participant contribution.
- Participants may opt-out of this activity at any time.
- Each participating head of household will receive a monthly deposit of \$50.00
- Youth of participating head of households, ages 13-18 are eligible to participate in the savings program (up to 3 per household) and will receive a monthly deposit of \$25.00.
- Funds will be provided in the form of a savings account that will accrue for two (2) years or until the account reaches \$5,000.00.
- Head of household participants may deposit additional amounts that will be matched by the GRHC on an annual basis of up to \$1,000 per year for two (2) years.
- Youth participants may deposit additional amounts that will be matched by the GRHC on an annual basis of up to \$500 per year for two (2) years.
- Participants must let the funds accumulate in the account for at least one (1) year before they can access the funds unless the participant demonstrates an urgent need.
- Each participant must agree to open a savings account with a partnering financial institution and will be offered educational opportunities around banking, saving and financial management.

**The Grand Rapids Housing Commission received no public comments during the public comment period.**

**A public hearing was held on March 11<sup>th</sup>, 2024, no comments were received.**

## Impact Analysis

|    |  |
|----|--|
| 1. | <p><b>Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution).</b><br/>         The GRHC will decrease the frequency of reexaminations from annual to biennial for all public housing and HCV households. The GRHC predicts that this activity will produce operational cost savings, as staff are freed to manage other administrative obligations. The GRHC would have an estimated cost savings of \$416,000 biennially by implementing this objective.</p> |
| 2. | <p><b>Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs).</b><br/>         This activity will allow the GRHC households to have a more consistent tenant rent portion over a longer period, which will consequently make the public housing and HCV programs more affordable for families.</p>   |
| 3. | <p><b>Impact on the agency's waitlist(s) (e.g. any change in the amount of time families is on the waitlist).</b><br/>         This activity will not affect the waiting list.</p>   |
| 4. | <p><b>Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency).</b><br/>         This activity will not affect the termination rate of families.</p>   |
| 5. | <p><b>Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.</b><br/>         This activity will not affect the agency's current public housing occupancy level or utilization rate in the HCV program.</p>   |
| 6. | <p><b>Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.</b><br/> <i>MTW Statutory Objective - Cost Effectiveness</i><br/>         This activity will decrease the administrative costs associated with processing annual and interim recertifications.</p>   |
| 7. | <p><b>Impact on the agency's ability to meet the MTW statutory requirements.</b><br/>         The GRHC will be able to meet the statutory objectives of Cost Effectiveness.</p>  |
| 8. | <p><b>Impact on the rate of hardship requests and the number granted and denied as a result of this activity.</b><br/>         The GRHC does not expect to see an increase in hardship requests as a result of this activity.</p>  |
| 9. | <p><b>Across the other factors above, the impact on protected classes (and any associated disparate impact).</b><br/>         This activity is based on income reviews, in which protected class is not a factor, and there is no anticipated impact on protected classes.</p>   |