

PHA Name : Harrisburg Housing Authority

PHA Code : PA008

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

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Amended Annual Submission

B. MTW Supplement Narrative.

HHA's overall goal for its MTW Program is to increase the housing opportunities for low-income residents in the City of Harrisburg. HHA plans to reach this goal by making changes within the administrative work done on both the public housing and section 8 sides of our program, in order to free up time, money and resources so staff can focus efforts on better serving our clients. Furthermore, HHA will be making a concerted effort to connect and work with local landlords to educate them on the benefits of renting to lower income tenants, while also addressing myths, stereotypes, obstacles and deterrents they are concerned with regarding participation in HHA's Section 8 Program. In coordination with the objectives of the MTW Demonstration Program, HHA plans to meet its goals through objectives that are cost effective, encourage the self-sufficiency of HHA's tenants and broaden the housing choice for low- income tenants.

Reduce cost and achieve greater cost effectiveness in federal expenditures:

During the fiscal year 2023 HHA will be putting a number of waivers in place that allow us to achieve greater cost effectiveness. These waivers include getting rid of utility reimbursements, so we aren't writing checks to tenants each month, which not only costs money, but time for our employees to cut sign, and send out each check. Cost effective waivers also include changing reexamination schedules that will free up personnel time and energy. HHA will be increasing PBV contract length and limiting Portability for PBV units which will help greatly for this particular area, where a large amount of tenant's chose to port out of our jurisdiction almost immediately upon getting a voucher or living in Harrisburg for a year. HHA will also be adopting income exclusions for tenants who hold certain jobs, which encourages our tenants to work and pay rent. HHA will be waiving the need for prior HUD approval in acquisitions which will allow HHA to move more efficiently in building new housing and getting funding and partners more willing to enter into agreements by taking down some of the time barriers to planning and starting work.

Give incentives to families with children whose heads of household are working, seeking work, or are participating in job training:

During the fiscal year 2023 HHA will using certain waivers to promote households with children to work and/ or participate in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient. One waiver used will be the income exclusion waiver for our public housing residents who are working will be able to waive a percentage of their income if they work in certain job fields or are getting training or education in that area.

Increase Housing choices for low-income families:

During the fiscal year 2023 HHA is requesting waivers specific to the Cohort 3 objective of providing landlord incentives that will have the strongest impact in increasing housing choice for low-income families. HHA will be changing the Payment Standard Fair Market Rents and Rent Reasonableness Process so that Landlords will be able to charge competitive rents for the area. Currently the FMR and Rent Reasonableness does not compare to the market rate rents being charged and therefore landlords are not seeing a benefit in joining the Housing Choice Voucher (HCV) Program. Furthermore, due to stereotypes and myths spread about renting to low-income tenant's landlords have cited tenant damages and the transitory nature of low-income tenants as a barrier keeping them from joining the HCV Program. HHA plans to combat this by putting in place the Damage Claims Waiver, along with adding Leasing Incentive Payments and Vacancy Loss Payments.

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

1. Tenant Rent Policies	
a. Tiered Rent (PH)	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)	Plan to Implement in the Submission Year
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Plan to Implement in the Submission Year
c. Rent Reasonableness – Process (HCV)	Plan to Implement in the Submission Year
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Plan to Implement in the Submission Year
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

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

C. MTW Activities Plan that Harrisburg Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing**1.m. - Utility Reimbursements (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 Public Housing HHA will eliminate utility reimbursement payments when the utility allowance is greater than the TTP. This will further the MTW initiatives of Cost Effectiveness and Housing Choice. HHA will first implement this waiver by making sure HHA has all utilities for each public housing property in its name. This will allow HHA control overpaying the utilities and prevent utility shut offs that can result in housing issues for tenants including unsafe or unsanitary conditions, or lease violations. This will also save HHA the administrative cost of preparing, signing, and sending out reimbursement checks to families, as well as saving the actual money spent on reimbursement. HHA will charge tenants only for excessive over use of utilities.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

N/A

1.p. - Imputed Income (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 the fiscal year of 2023 HHA wishes to implement the Imputed Income waiver for its Public Housing Program. HHA will base the rent on an assumed number of hours worked per week. For a single person household this will be 15 hours worked per person , per week at the Federal Minimum Wage of \$7.25. For a household with two or more, non-disabled, non elderly persons, and not including children it will be based on 30 hours worked per week at the Federal Minimum Wage of \$7.25. HHA's goal will be to encourage households to seek and keep employment along with reporting income previously gone unreported.

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

Cost effectiveness; Self-sufficiency

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

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.

N/A

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.)

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

No

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

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

Does the imputed income policy assume a set number of hours worked per individual or per household?

Per individual

How many hours per week are assumed?

15

What is the assumed wage rate?

\$7

How many households are currently subject to this policy?

0

1.v. - Alternative Income Inclusions/Exclusions (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

HHA will use this waiver to establish alternative policies to include or exclude certain forms of participant income during the income review and rent calculation process. The exclusions that HHA plans to put in place will help promote self sufficiency and benefit those working in professions that are readily available in the area and are beneficial to the community. Furthermore, the goal of the exclusion is to help individuals in these professions grow and eventually not need subsidized housing. This will not affect elderly and disabled families if it were to increase the rent. The families that may benefit from the exclusions to select incomes will have to pay a minimum of rent calculated at 40 hours a week at the federal minimum wage and will not be able to exclude income that would be equivalent to the imputed income. Furthermore the exclusion will stop once the actual income is equal to 80% AMI or more. The exclusion will have a 3 year term that will run concurrently with the earned income disallowance, if they qualify for both. Once the exclusion is triggered they have a one time 3 year time frame for it to be used.

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

Self-sufficiency; Housing choice

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

Decreased 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.

N/A

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

What inclusions or exclusions will be eliminated, modified, or added?

Any tenants who work for the government, in the health care industry, as a first responder, or as an educator, will have their income that is counted towards their rent calculation capped at 40 hours a week at the federal minimum wage. Any money earned above that dollar amount will be excluded up until their income puts them at 80% of the AMI and they would no longer qualify for public housing. Exclusions will only last 3 years. The exclusion can run concurrently to the Earn

Income Disallowance and then continue for one year if the family qualifies for both at the beginning of their employment.

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

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

For HCV program in the City of Harrisburg, a substantial deterrent and grievance from landlords is their inability to charge rents that are comparable to the units that are not part of the program. Part of this is due to the Fair Market Rents (FMR) published by HUD for the area, are not reflective of the actual rents being charge in the city, instead they are reflective of the greater area covered by HUD's FMR publication. HHA will be using FMR between 80%-120%, along with the waiver of setting a local process to determine rent reasonableness, to combat this deterrent. This change will contribute to Cohort's

larger initiative of garnering more landlord participation in the HCV program.

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

Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.
Increased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
N/A
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does the MTW activity require an impact analysis?
Yes
This document is attached.
Does the impact analysis apply to more than this MTW activity?
No
Please explain the payment standards by FMR:
HHA will be using FMR between 80%-120%

2.c. - Rent Reasonableness – Process (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
<p>For the fiscal year 2023 HHA wishes to implement the rent reasonableness waiver to change the process in which HHA determines the rent reasonableness calculation. This will be used in conjunction with the change in FMR waiver so that landlords will be able to charge rents that more comparable to market rate units in the area. Currently HHA uses the EZ-Reasonable Rent Determination Report from a contractor and it often falls far below what comparable market rent units that are being listed for the city.</p> <p>HHA has contacted its current contractor and will first be updating our database that has not been updated since 2016 to get a better option of comparable units for the rent reasonableness determination. HHA will also speak with Landlords to make sure their properties information has the correct data listed. In addition to these changes HHA will train staff to make sure they are using the accurate definitions in the contractor's system regarding housing type and amenities. Lastly, if a Landlord disagrees with a Rent Reasonableness determination HHA will allow a landlord to submit their own comparable properties and the contractor will third party verify them. HHA's goal will be to attract and retain more landlords and therefore increase housing choice for our HCV participants. Furthermore, through the Administrative Plan, the agency shall make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area. ii. At the Department's request, the agency must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units</p>
Which of the MTW statutory objectives does this MTW activity serve?
Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

N/A

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

No

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

HHA's method for determining rent reasonableness will be to update the outdated comparable properties that the currently contracted system is using, and then train staff and landlords on how to get the best comparable results using the system. Also, the contractor has agreed to third party verify comparable properties provided by landlords if they disagree with the rent reasonable determination given to the landlord from HHA. The motivation for these changes is due to the fact that HHA has found many times that the rent reasonableness determination provided by HHA's current contractor have been falling far below market rents in the area causing landlords to be unmotivated to rent to Section 8 voucher holders.

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

HHA can perform rent reasonable determinations on PBV units that HHA owns, manages, and /or controls. This will be done in the same way it is done for the tenant-based HCV vouchers. For the same reason that this is important for the overall HCV program it opens up housing choice for tenants and allows HHA to charge and collect comparable rents on PBV units. The agency shall establish and make available a quality assurance method to ensure impartiality,

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.

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.

N/A

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.

HHA's quality assurance method for this program will mirror that of the HCV programs for tenant based vouchers. HHA will have contractor run the comparable for HHA. If HHA disagrees with the comparable units used we will submit our own for the contractor to verify as a third party . The agency shall establish and make available a quality assurance method to ensure impartiality,

No document is attached.

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

The rent reasonableness method is a program ran is ran by a current contractor and is called EZ-Reasonable Rent Determination Report. HHA will be updating the system with comparable units that are no longer outdated and then allowing landlords a chance to provide their own comparable units in the chance of a disagreement on the determination, for the contractor to third party verify.

No document is attached.

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

HHA plans to have an alternative reexamination schedule that will be once every 2 years, instead of the current requirement of every year. The goal for this activity is to lighten our staff's administrative burden in doing annual recertification . Furthermore, it could prevent vouchers being cancelled for failing to recertify and provide the tenant and landlord from having to deal with the financial and time burdens of eviction and/or move outs. Tenant's will be allowed 1 interim recertification per year at their request. This Interim will only be allowed if income decreases 10% or more, so that tenant is not burdened with an unaffordable rent.

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

Cost effectiveness; Self-sufficiency; Housing choice

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

Decreased expenditures

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

The MTW activity applies 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.

N/A

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

1

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

HHA will be putting the onus on the family to report their income changes as they happen in between recertification. If a tenant does not report an increase in income during the 2 year period they will be back charged for the correct amount of rent they should have been paying. It will be made clear to tenant's that reporting their income and family composition is still a requirement under the program, and if they are found to be abusing the new system it could lead to termination of their voucher.

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

With the goal to incentivize landlords to join and remain in the HCV Program HHA will be making additional payments to Landlords equal to no more than one month contract rent. Landlords will get this payment when they execute a HAP contract with a new participant after their most recent participant has vacated. Payment amount will be based on efficiency of lease up. If a Landlord leases a new HCV participant in 1 week they will get a full months payment, if they lease up in 2 weeks they will get half a months payment and if they lease up in 3 or more weeks they will get a third of a months payment of the contracted rent. The agency must update its Administrative Plan to reflect the vacancy loss policy.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

N/A

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? Under this policy the maximum amount that a Landlord can get is a full months contract 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.b. - Damage Claims (HCV-Tenant-based Assistance)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative To incentivize Landlords to join and remain in the HCV program HHA will provide landlords with compensation if a tenant leaves the unit damaged, and the landlord can provide proof of the cost of damages less the security deposit and that the damages were beyond normal wear and tear. The proof of damages must include, pictures, pre and post inspection documentation, and receipts or estimates for cost of repair. HHA will limit the tenant damage payout to two months of contract rent or the actual cost of repairs whichever is less and calculated after the security deposit is used. These payments will only be made after the next HAP contract is executed between the landlord and HHA. The agency must update its Administrative Plan to reflect the damage claim policy, in the description.
Which of the MTW statutory objectives does this MTW activity serve? Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Increased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. N/A
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?) To all units
What is the maximum payment that can be made to a landlord under this policy? The maximum payment would be either two months contract rent less the security deposit, or the actual cost of damages less the security deposit, whichever amount it less.

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

HHA will be providing incentive payment to new Landlords who join HHA's HCV program. This will be for 1 month of contract rent and will be provided when a HAP contract is executed with the agency. HHA will also be providing Landlords who renew a lease with the same tenant a one month payment to incentivize landlords to stay on the program. This will also be limited to 1 months contract rent.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

N/A

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

No

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

To all units

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

The maximum payment a Landlord could get is one month contract 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

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**

HHA will put in place a waiver to allow HHA to perform HQS inspection on PBV units that it owns, manages and or controls. The quality assurance method used will be to allow tenants to ask for an inspection by a third party contractor if they request it. Also participants are able to ask for interim inspection and the standards will be the HQS standards found at 24 CFR 982.401 .

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.

N/A

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 quality assurance method provided in this waiver is a tenant's right to request a third party HQS inspection.

No document is attached.

6.b. - Short-Term Assistance (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**

HHA wishes to implement a short-term housing assistance program with the goal of targeting the homeless population and partnering with local service providers. The assistance provided by HHA will be for no longer than 36 months but no shorter than 3 months. HHA plans to utilize Project Based Vouchers in collaboration with organizations that have shared housing opportunities. These organizations will collaborate with HHA's PBV program and Section 8 department to provide self-sufficiency training such as counseling services, daycare and health care services to create a quantifiable program with benchmark goals that if met will allow a tenant in these programs to graduate into HHA's Section 8 Tenant Based Program. Once in the Section 8 Tenant Based Program, services will be continued in collaboration with HHA's FSS program with the goal of full independence from supportive housing. Under no circumstances will participants be required to participate in supportive services that are targeted to persons with disabilities in general, or persons with any specific disability. vi. The agency must not require participation in supportive services as a condition for housing subsidy for elderly and disabled families.

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

Self-sufficiency; Housing choice

<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased revenue; Increased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions (i.e., applicants) only</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>The projects that are tied to partner organizations who are using our project based vouchers will be participating in this MTW activity.</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>N/A</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the impact analysis apply to more than this MTW activity?</p> <p>No</p>
<p>What is the term of assistance?</p> <p>36 months</p>
<p>How is the tenant contribution established for this program?</p> <p>The tenant contribution will be based on their ability to follow the partner organization's self sufficiency goals .</p>
<p>How many households do you expect to serve in this program in the Fiscal Year?</p>

How do you fulfill the obligation to offer participants in this program the opportunity to transition to the HCV or public housing (as applicable) program subject to availability?

The program will begin with a PBV which has the ability to be converted into an tenant based voucher. Therefore this program will have the voucher already available and just set a limit on the ability for the tenant to convert to Tenant Based, by requiring them to meet the self sufficiency program requirements first.

Please list any partner organizations and briefly note the services that each provides.

Following is the list of partner organization and the service that each provides :

Shalom House: Shalom House provides for tenants basic needs: a bed, assistance with food resources, clothing , health and hygiene supplies , and a temporary address and telephone numbers. Shalom House's extended case management services help individuals move toward self-sufficiency, to never become homeless again. Experienced caregivers know when to listen, when to hug, and when to give advice. Shalom House services include: case management, referral services, life skills training, computer facilities to expand current skills and prepare a resume.

Brethren Housing Association:

BHA helps individuals and families experiencing homelessness through housing and counseling provided by congregation pastors.

BHA operates the programs (Transitions, Side-By-Side and Next Steps), owns 10 parcels of land for 22 apartments, employs eight staff members and has 13 member churches as well as many other supporting congregations, businesses,

individuals and grant-making organizations who believe in the work of BHA.

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

HHA will authorize 50% of HCV units to be project based. This will increase the housing choice within the city along with helping with HHA's problem of people porting out of the area immediately upon getting a voucher. This will then in turn be more cost effective for HHA in administering its HCV program.

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

Cost effectiveness; Housing choice

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

Increased revenue

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

The MTW activity applies to all assisted households

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

N/A

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

HHA will increase the PBV project cap up to 100%. This will allow for more assisted units to be available in the city, improving the housing choice. The agency is subject to Notice PIH 2013-27 where applicable, or successor, in the description.

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

Cost effectiveness; Self-sufficiency; Housing choice

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

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.

N/A

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

HHA plans to eliminate the PBV selection process for HHA owned Projects without Improvement, Development or Replacement. This will allow HHA to move these projects along faster and get the housing available quicker by not having to go through the normal procurement process. This increases Housing Choice for low-income individuals and frees up employee time and hours for HHA which provides cost effectiveness in getting these PBV units in place. In doing this HHA will conduct a subsidy layering review, and complete site selection requirements. Any property that uses this waiver will be owned by a single asset entity of the agency and HQS inspections will be performed. HQS inspections must be performed by an independent entity according to 24 CFR 983.9(b) or 24 CFR 983.103(f). iv. The agency is subject to Notice PIH 2013-27 where applicable, or successor.

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

Cost effectiveness; Self-sufficiency; Housing choice

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

Decreased expenditures

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

The MTW activity applies 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.

N/A

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

HHA plans to expand PBV units so that they can be used with Shared Housing and Manufactured Housing to give more housing options to those who need affordable housing. The units must comply with HQS, deconcentration and desegregation requirements. A layering subsidy review will be conducted and the shared housing units will not be owner occupied. With limited housing in the Harrisburg Area this will help expand options.

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

Cost effectiveness; Self-sufficiency; Housing choice

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

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.

N/A

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

No

How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?

2

How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?

0

How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?

0

How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?

0

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

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

HHA will increase the minimum Contract length for PBV to no more than 50 years including extensions. This will assure that the units stay affordable for a longer period of time helping promote housing choice, self sufficiency, and cost effectiveness. This waiver will also free up the staff time required to re-up contracts more often. PBV HAP Contract is subject to appropriations and the ending of an agency's MTW authorization, in the description.

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

Cost effectiveness; Self-sufficiency; Housing choice

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

Decreased expenditures

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

The MTW activity applies 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.

N/A

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

No

9.h. - Limit Portability for PBV Units (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

HHA will be waiving the requirement to provide a tenant-based voucher at 12 months when requested by a PBV household. Instead HHA will be restricting the ability to get a tenant-based voucher to 24 months. HHA encounters a significant number of individuals requesting to port out of the area with both the tenant based and project based vouchers and will use this as a way to combat the flight that we have. In accordance with the Safe Harbor requirements, the agency must have a clear and uniform policy in place to address how move requests are received and how they are approved/denied for PBV households, and participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.

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

Cost effectiveness; Self-sufficiency; Housing choice

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

Decreased expenditures

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

The MTW activity applies 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.

N/A

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

No

15. - Acquisition without Prior HUD Approval (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 agency would like to acquire public housing sites without prior HUD approval. This will allow flexibility in getting projects started without having to wait on HUD's final approval. HHA will make sure that submission materials in acquisitions are in place as if HUD were approving the proposal, and within 30 days of the acquisition will provide the materials to the Field Office for approval. Furthermore, the agency will have an environmental assessment done, an independent appraisal of the site, and make sure it is in compliance with local zoning. By being able to seamlessly begin acquisitions and continue with project developments will benefit the agency in becoming more cost effective through better time management.

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.

N/A

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

No

17.c. - Housing Development Programs

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

HHA will use this waiver to use MTW Funding to acquire, renovate and/ or build affordable units for low-income families that are not public housing units. The funding used on local, nontraditional activities will be no more than 10% of HHA's HAP budget. In Harrisburg there is limited housing available and many different interests at mind trying to use the land to develop. It is important that HHA be able to put money into projects to guarantee affordable housing is part of the development in the limited spaces in the city. This waiver will help HHA achieve that goal by providing gap financing for non-PHA developments of affordable housing, development of project-based voucher units or tax credit partnerships. In accordance with the Safe Harbors Families receiving housing or services through local, non-traditional activities must meet the HUD definition of low-income. Furthermore, The agency is subject to Notice PIH 2011-45 or any successor notice and/or guidance. Also the agency must comply with section 30 of the 1937 Housing Act and any MTW Funding awarded to a third-party provider must be competitively bid.

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 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.

N/A

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

No

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Bethel Village	New Construction	Gap Financing	49.00	49.00	0.00	0.00	30.00	19.00

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>Yes, the Safe Harbor Waiver request(s) for 1v is(are) attached.</p>

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

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2022	\$10,364,385	\$9,423,601	\$940,784	2030-09-30

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

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

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

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

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

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

I.	Evaluations.
	No known evaluations.

Tenant Association Meeting : Safe Harbor Waiver- Income Exclusion to include Elderly and Disabled

1. Tenant's were concerned about income increases changing their social security income.
 - a. Advised them to have AMP directors help them with the math in these situations and working may still benefit them more than the deduction in SSI
2. Tenants asked if a job with the probation office would qualify as government work
 - a. HHA said that it would most likely, after reviewing the employer's paperwork, qualify
3. Tenants asked if they were required to work under this provision
 - a. The answer is no
4. Tenants had questions beyond the scope of this waiver regarding FSS participation, including whether elderly could join, and what the future of the program would look like.
 - a. We advised them on HHA's current program and some of the requirements and benefits and that elderly could join
 - b. We also advised them to meet with our FSS Coordinator if interested in joining
 - c. We discussed HHA's future goals with FSS and the MTW program including home ownership and more hands-on guidance to self sufficiency
 - d. We encouraged dialogue and thoughtful conversation regarding programs that would encourage work including employers matching escrow.