

# 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:** 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).**

<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)	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
<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)	Plan to Implement in the Submission Year
c. Rent Reasonableness – Process (HCV)	Plan to Implement in the Submission Year
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	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
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	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
<b>6. Short-Term Assistance</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Plan to Implement in the Submission Year
<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)	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
<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)	Plan to Implement in the Submission Year
<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	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)**

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.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Decreased expenditures

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.****In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**1.p. - Imputed Income (PH)**

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.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency

**This MTW activity has the following cost implications:**

Increased revenue
<b>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently 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
<b>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</b>
<b>Attached Hardship policy applies to:</b> }
<b>No hardship were requested in the most recent fiscal year.</b>
<b>In the prior year, under this activity, Harrisburg Housing Authority MTW agency</b> Received 0 hardship requests  Approved hardship requests  Denied hardship requests  There is\are hardship requests pending.
<b>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</b>
<b>the imputed income policy assumes a15 number of hours worked Per individual</b>
<b>Assumed wage rate is</b> 7
<b>0 households are currently subject to this policy</b>

<b>1.v. - Alternative Income Inclusions/Exclusions (PH)</b>
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.
<b>This MTW activity serves the following statutory objectives:</b> Self-sufficiency;Housing choice
<b>This MTW activity has the following cost implications:</b>

Decreased revenue

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

The MTW activity applies 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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**Following 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)**

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.

**This MTW activity serves the following statutory objectives:**

Housing choice

**This MTW activity has the following cost implications:**

Increased expenditures

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

The MTW activity applies to all assisted households

**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

<b>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</b>
<b>No hardship were requested in the most recent fiscal year.</b>
<b>In the prior year, under this activity, Harrisburg Housing Authority MTW agency</b>  Received 0 hardship requests  Approved hardship requests  Denied hardship requests  There is\are hardship requests pending.
<b>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</b>
<b>Following will explain the payment standards by FMR:</b>  HHA will be using FMR between 80%-120%

<b>2.c. - Rent Reasonableness – Process (HCV)</b>
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. 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
<b>This MTW activity serves the following statutory objectives:</b>  Housing choice
<b>This MTW activity has the following cost implications:</b>  Increased expenditures
<b>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently 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
<b>No hardship were requested in the most recent fiscal year.</b>
<b>In the prior year, under this activity, Harrisburg Housing Authority MTW agency</b>  Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**Following method is 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)**

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,

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**Following will explain quality assurance method:**

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, **and attached for quality assurance method**

**Following will explain 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. **and attached for rent reasonableness determination method**

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

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.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency;Housing choice

**This MTW activity has the following cost implications:**

Decreased expenditures

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

The MTW activity applies to all assisted households

**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

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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

**Recertification Schedule is**

Once every two years

**Household may request 1 interim recertifications per year.**

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)**

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.

**This MTW activity serves the following statutory objectives:**

Housing choice

**This MTW activity has the following cost implications:**

Increased expenditures

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This policy applies to**

To all units

**The types of units policy applies to:**

**Maximum payment to the landlord is**

\$Under this policy the maximum amount that a Landlord can get is a full months contract rent..

**0 payments were issued under this policy y in the most recently completed PHA fiscal year.**

**\$0 issued under this policy in the most recently completed PHA fiscal year.**

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

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.

**This MTW activity serves the following statutory objectives:**

Housing choice

**This MTW activity has the following cost implications:**

Increased expenditures

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This policy applies to**

To all units

**The types of units policy applies to:**

**Maximum payment to the landlord is**

\$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..

**0 payments were issued under this policy y in the most recently completed PHA fiscal year.**

**\$0 issued under this policy in the most recently completed PHA fiscal year.**

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

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.

**This MTW activity serves the following statutory objectives:**

Housing choice

**This MTW activity has the following cost implications:**

Increased expenditures

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This policy applies to To all units (Display selected and additional Pop up is complex logic.)**

**The types of units policy applies to:**

**Maximum payment to the landlord is**

\$The maximum payment a Landlord could get is one month contract rent..

**0 payments were issued under this policy y in the most recently completed PHA fiscal year.**

**\$0 issued under this policy in the most recently completed PHA fiscal year.**

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

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 .

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Decreased expenditures

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**The quality assurance method:**

**Following will explain the quality assurance method** – The quality assurance method provided in this waiver is a tenant's right to request a third party HQS inspection.

If [Upload file] options- Display 'Attached for quality assurance method'

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

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.

**This MTW activity serves the following statutory objectives:**

Self-sufficiency;Housing choice

**This MTW activity has the following cost implications:**

Increased revenue;Increased expenditures

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

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

**This MTW activity applies to:**

New admissions (i.e., applicants) only

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

The MTW activity applies only to selected family types

**This MTW activity applies to the following housing choice voucher unit types:** The projects that are tied to partner organizations who are using our project based vouchers will be participating in this MTW activity.

**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

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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

**The term of assistance is**

36 months

**Following is how the tenant contribution was established:**

The tenant contribution will be based on their ability to follow the partner organization's self sufficiency goals .

**2 households are expected to be served in this program in the Fiscal Year.**

**Following is how participants will be offered 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.

**Following is the list of partner organizations and 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)**

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.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Increased revenue

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

50.00% of total authorized HCV units will be authorized for project-basing.

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

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.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency;Housing choice

**This MTW activity has the following cost implications:**

Increased revenue

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

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.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency;Housing choice

**This MTW activity has the following cost implications:**

Decreased expenditures

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

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.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency;Housing choice

**This MTW activity has the following cost implications:**

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**The MTW agency anticipates 2 number of shared housing units in the fiscal year.**

**The MTW agency assisted 0 number of shared housing units in the most recently completed PHA fiscal year.**

**The MTW agency anticipates 0 number of manufactured housing units in the fiscal year.**

**The MTW agency assisted 0 number of manufactured housing units in the most recently completed PHA fiscal year.**

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

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.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency;Housing choice

**This MTW activity has the following cost implications:**

Decreased expenditures

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**9.h. - Limit Portability for PBV Units (HCV)**

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.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency;Housing choice

**This MTW activity has the following cost implications:**

Decreased expenditures

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

#### 15. - Acquisition without Prior HUD Approval (PH)

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.

#### **This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

#### **This MTW activity has the following cost implications:**

Decreased expenditures

#### **An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

#### **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

#### **No hardship were requested in the most recent fiscal year.**

#### **In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

#### 17.c. - Housing Development Programs

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.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Increased expenditures

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

The MTW activity applies to all assisted households

**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

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Harrisburg Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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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<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<b>Safe Harbor Waivers seeking HUD Approval:</b> No Safe Harbor Waivers are being requested.

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<b>Agency-Specific Waiver(s) for HUD Approval:</b>  The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.  No Agency-Specific Waivers are being requested.
<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b> MTW Agency does not have approved Agency-Specific Waivers

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

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

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

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
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	<b>0</b>

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.	

I.	Evaluations.
No known evaluations.	

HHA’s Hardship Policy covers the following initiatives:

- A. Payment Standards Fair Market Rents (FMR)..... 1
  - 1. Who may use this hardship request: ..... 2
  - 2. Determination that a hardship exists: ..... 2
  - 3. Grievance Procedure: ..... 2
  - 4. Tracking:..... 2
- B. Alternative Reexamination Schedule - HCV ..... 2
  - 1. Who may use this hardship request: ..... 2
  - 2. Determination that a hardship exists: ..... 2
  - 3. Grievance Procedure: ..... 3
  - 4. Tracking:..... 3
- C. Imputed Income (PH)..... 3
  - 1. Who may use this hardship request: ..... 3
  - 2. Determination that a hardship exists: ..... 4
  - 3. Grievance Procedure: ..... 4
  - 4. Tracking:..... 4
- D. Short-Term Assistance (HCV) ..... 4
  - 1. Who may use this hardship request: ..... 4
  - 2. Determination that a hardship exists: ..... 4
  - 3. Grievance Procedure: ..... 5
  - 4. Tracking:..... 5

All Hardship requests must be made in writing, to HHA management, stating the reason for the request and, if applicable, the duration of the requested exemption from the MTW initiative.

**A. Payment Standards Fair Market Rents (FMR)**

If HHA ends up using FMR that are between 80% and 100% FMR and the Rent Reasonableness Calculation for a unit comes in above the 80-100% FMR set, a tenant can ask for a hardship waiver of this policy. The tenant may request that HHA use the rent reasonableness calculation up to 100% FMR for the unit rent instead of the FMR limit, and HHA will cover the additional rent over 40% of the tenant’s income.

1. **Who may use this hardship request:**  
A Section 8 Voucher holder who finds a unit with a rent reasonableness calculation over the FMR limit.
2. **Determination that a hardship exists:**  
After a Hardship exemption of this waiver is requested HHA will immediately determine if the family qualifies for an exemption by looking at the rent reasonableness of the property in question compared to the FMR.
3. **Grievance Procedure:**  
If a family is denied a Hardship exemption to this waiver, they will have a right to grieve the determination by requesting a review of the determination in writing within 10 days of the denial. Request can be made by sending them to the tenant's caseworker, the Section 8 Coordinator, or directly to HHA's hearing officer.
4. **Tracking:**  
HHA will keep records of all hardship requests received and the results of the requests. They will be supplied to HUD when requested and are available for public review and inspection at the agency's principal office during normal business hours.

## **B. Alternative Reexamination Schedule - HCV**

A tenant who has already requested an interim recertification for a 10% decrease in income during a year may ask for another interim if they experience unexpected extenuating circumstance that cause another extreme decrease in income or increase in expenses. Such circumstance will be reviewed on a case-by-case basis but could include death in the family, reduction in or loss of earnings or other assistance that was not directly caused by the voucher holder, increase in medical costs, childcare, transportation, education, and/or similar circumstances.

1. **Who may use this hardship request:**
  - a. A Section 8 Voucher holder who has experienced an additional decrease in income in a year, that is either after the interim request of a 10% decrease, or due to other extenuating circumstances causing a financial hardship. Such circumstances may be due to reduction of employment, death in the family, or reduction in or loss of earning or other assistance.
  - b. A Section 8 Voucher holder who has an increase in expenses due to extenuating circumstances such as medical costs, childcare, transportation, education, or similar circumstances.
2. **Determination that a hardship exists:**  
After a Hardship exemption of this waiver is requested HHA will immediately determine if the family qualifies for an exemption by looking at all proof of income or expenses and determining on a case-by-case basis if the situation constitutes a financial hardship that justifies an exemption from the waiver as applied.

### 3. Grievance Procedure:

If a family is denied a Hardship exemption to this waiver, they will have a right to grieve the determination by requesting a review of the determination in writing within 10 days of the denial. Request can be made by sending them to the tenant's caseworker, the Section 8 Coordinator, or directly to HHA's hearing officer.

### 4. Tracking:

HHA will keep records of all hardship requests received and the results of the requests. They will be supplied to HUD when requested and are available for public review and inspection at the agency's principal office during normal business hours.

## C. Imputed Income (PH)

HHA has implemented an Imputed income of 15 hours a week *per person* at the Federal Minimum Wage, and 30 hours per week *per household* at the Federal Minimum Wage. This applies to public housing residents who are neither elderly nor disabled. A household of more than one person that consists of only 1 adult that is not disabled or elderly, and the rest of the household is children, or individuals who are elderly and disabled will only have an imputed income of 15 hours per week at the Federal Minimum wage.

Any resident head of household that is not working and has no other source of income and fits the following criteria listed below may make a written request for a financial hardship exemption. (Note: This hardship exemption only applies to residents that have no source of income, it does NOT apply to households that are unemployed but are still collecting other sources of income). The written request must be submitted to the AMP Director PRIOR to the rent becoming delinquent, which is prior to the close of business on the 5th calendar day of each month.

If you request a Imputed Income hardship exemption and your request is approved, your new rent amount will be based on your total tenant payment (TTP). Calculating rent based on the TTP is required by federal regulation and is the method used to calculate rent for all public housing residents that are not paying a minimum rent or ceiling rent, as appropriate. HHA will review accepted requests every 3 months to determine if they should be modified.

The written request must contain one of the following situations in order to be considered eligible for a hardship exemption, which includes:

#### 1. Who may use this hardship request:

- a. The family has lost eligibility for, or is awaiting an eligibility determination from a federal, state, or local assistance program. This includes a family with a member who is an alien, lawfully admitted for permanent residence, under the Immigration and Nationalization Act, who would be entitled to public benefits, but for Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996;
- b. The family would be evicted because it is unable to pay the minimum rent;
- c. The household income has decreased because of changed circumstance(s), including loss of employment, birth of a child, or other extenuating circumstances as determined on a case by case basis;
- d. A death in the tenant family has occurred, resulting in loss of income;

**2. Determination that a hardship exists:**

After a Hardship exemption of this waiver is requested HHA will immediately determine if the family qualifies for an exemption by looking at all proof of income or expenses and determining on a case-by-case basis if the situation constitutes a financial hardship that justifies an exemption from the waiver as applied. Any accepted request will be reviewed in 3 months to determine if the hardship still applies.

**3. Grievance Procedure:**

If a family is denied a Hardship exemption to this waiver, they will have a right to grieve the determination by requesting a review of the determination in writing within 10 days of the denial. Request can be made by sending them to the tenant's AMP Director, or directly to HHA's hearing officer.

**4. Tracking:**

HHA will keep records of all hardship requests received and the results of the requests. They will be supplied to HUD when requested and are available for public review and inspection at the agency's principal office during normal business hours.

**D. Short-Term Assistance (HCV)**

HHA will 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 to help organizations that have shared housing opportunities that are combined with counseling services, daycare, and health care services. With these partners HHA will create a quantifiable program with benchmark goals that if met, will allow a tenant in these programs to graduate into HHA's section 8 program where services will be continued in collaboration with HHA's FSS program with the goal of full independence from supportive housing. The supportive service portion of this program will be required for an individual to receive assistance unless they are elderly, disabled, or meet the requirements for a hardship exemption as described below.

**1. Who may use this hardship request:**

A participant in the short-term assistance program who is unable to meet the supportive service goals due to a physical, mental, financial, or other extenuating circumstance may apply for exemption. The extenuating circumstances that the participant claims must be verified by the community provider working with the participant and accompanied by any supporting documents.

**2. Determination that a hardship exists:**

After a Hardship exemption of this waiver is requested HHA will immediately determine if the family qualifies for an exemption by looking at all proof of circumstance provided by the participant and their provider and make a determination on a case-by-case basis. Extenuating

circumstances may include but are not limited to include medical issues, family emergencies, childcare concerns, transportation problems, work conflicts, etc.

**3. Grievance Procedure:**

If a family is denied a Hardship exemption to this waiver, they will have a right to grieve the determination by requesting a review of the determination in writing within 10 days of the denial. Request can be made by sending them to the HHA project coordinator, sending it through their supportive service coordinator, or directly to HHA's hearing officer.

**4. Tracking:**

HHA will keep records of all hardship requests received and the results of the requests. They will be supplied to HUD when requested and are available for public review and inspection at the agency's principal office during normal business hours.

**Financial Impact**

The cost implications to this waiver, is that HHA will have an expenditure decrease by saving staff time in completing reexaminations, tracking down tenants, and doing voucher terminations based on failure to recertify.

**Affordability of Housing Costs for Families**

This change should not impact the housing cost on family. Furthermore, by allowing the family to request a recert if their income decreases by at least 10% a decrease in income during a year without recertification should not be overly detrimental. Lastly, there is an ability to request a hardship exemption from this waiver in extenuating circumstances.

**Agency's waitlist**

HHA does not predict that this waiver will have much of an affect on the agency's waitlist.

**Agency's Termination Rate of Families**

HHA predicts that the termination rate for families will decline due to this waiver. Tenant's will be less likely to be terminated for failure to recertify given the longer amount of time between recertifications.

**HCV Utilization Rate**

By decreasing the amount of voucher holders that are terminated due to failure to recertify each year HHA predicts a higher utilization rate of its vouchers.

**Impact on MTW goals of cost effectiveness, self-sufficiency and housing choice.**

This MTW waiver will have an impact on all three of the MTW goals. It will be cost effective by freeing up staff's time that is consumed with annual recertification paperwork, tracking down tenants, and terminations due to failure to recert. It will promote self-sufficiency by putting the responsibility of requesting interim recertifications in the hands of the tenant. Lastly, with less turnover due to evictions caused by failure to recertify, more vouchers will be utilized increasing housing choice.

**Impact on meeting MTW statutory requirements**

- Ensure 75% of households are very low-income

- This waiver should not have an impact on meeting the 75% very low-income requirement, as it will not change the threshold income requirement to get a voucher.
- Establish a reasonable rent policy that encourages employment and self-sufficiency
  - This waiver will encourage employment and self sufficiency by releasing the tenants of the burden of housing paperwork so they can focus on other improvement goals and giving them more responsibility in putting interim recertifications in their hands to initiate.
- Continue to assist substantially the same total number of eligible low-income households
  - If any impact is made on this requirement the prediction is that with more landlords incentivized to use the program because of the reduction in paperwork so more households will be helped.
- Continue to assist a comparable mix of households by family size
  - This waiver should not have an impact on this requirement.
- Meet Housing Quality Standard requirements
  - This waiver should not have an impact on this requirement.

### **Rate of Hardship Requests Granted or Denied**

A tenant who has already requested an interim recertification for a 10% decrease in income during a year may ask for another interim if they experience unexpected extenuating circumstance that causes another extreme decrease in income or increase in expenses. Such circumstance will be reviewed on a case-by-case basis but could include death in the family, reduction in or loss of earnings or other assistance that was not directly caused by the voucher holder, increase in medical costs, childcare, transportation, education, and/or similar circumstances. HHA will track the rate in which these are requested and denied.

### **Impact on protected classes and any disparate impact**

This waiver should not pose a disparate impact on any protected class as it is applied across the board to all families. HHA will track trends in hardship requests, along with whether they are granted and denied, and watch for any trends that may lead to the unfair treatment of a protected class.

**Financial Impact**

The cost implications to this waiver, are that the authority will likely gain revenue from tenant's who claim to not be working but are employed at places, or getting money from odd jobs, from family, and friends that goes unreported. HHA also predicts tenant's being motivated to keep employment and move up in their job positions because they will no longer be incentivized to quit with hopes of lower rents.

**Affordability of Housing Costs for Families**

This change will impact the amount that a family will pay towards their housing by increasing the rental calculation for those families who claim they have zero income and do not have a hardship exemption. HHA believes this will not be a huge burden due to the fact that very few tenants who are paying HHA's minimum rent of \$50 a month, request a hardship exemption to that policy.

**Agency's waitlist**

HHA does not predict that this waiver will have much of an affect on the agency's waitlist.

**Agency's Termination Rate of Families**

HHA predicts that the termination rate for families will not increase or decline. If a tenant is at risk of termination due to this waiver they can request a hardship exemption and if they have a circumstance that qualifies pay the TTP determined rent.

**PH Occupancy Rate**

HHA believes that this will not have an impact on the occupancy rate and that HHA's public housing properties will continue to have high occupancy.

**Impact on MTW goals of cost effectiveness, self-sufficiency and housing choice.**

This MTW waiver will have an impact on all three of the MTW goals. It will be cost effective by allowing HHA to collect more rent per unit from households who are earning incomes that have previously gone unreported. Furthermore, with tenant's knowledge that they will be assumed to have an income regardless of what they report, HHA predicts tenants will have a stronger motivation to work which will likely be more hours and income than what is imputed and therefore more rent collected.

**Impact on meeting MTW statutory requirements**

- Ensure 75% of households are very low-income
  - This waiver should not have an impact on meeting the 75% very low-income requirement, as it will not change the threshold income requirement to qualify for public housing.
- Establish a reasonable rent policy that encourages employment and self-sufficiency
  - This waiver will encourage employment and self sufficiency by motivating tenants to get employment above and beyond what the waiver assumes.
- Continue to assist substantially the same total number of eligible low-income households
  - This impact should not have an impact on this number because any tenant who has a hardship that could lead to eviction can request an exemption from this waiver.
- Continue to assist a comparable mix of households by family size
  - This waiver should not have an impact on this requirement.
- Meet Housing Quality Standard requirements
  - This waiver should not have an impact on this requirement.

### **Rate of Hardship Requests Granted or Denied**

Currently HHA allows hardship request for our \$50 minimum rent that is required of tenant's regardless of the amount of income they report. Currently HHA gets very few request for a hardship from this requirement. HHA predicts that the imputed income will have a similar effect. This requirement exempts the elderly and disabled and we are limiting it to 15 hours of imputed income at the Federal Minimum Wage of \$7.25 for a single person and 30 hours of imputed income for a household at the Federal Minimum wage of \$7.25. For a tenant with a one person household with no other deductions this would set their rent around \$140 and this would be reduced with any child deduction or other deduction they qualified for. For a family with 2 or more adults that are not elderly or disabled with no other deductions they would have a rent of \$282. It is rare that a family would have no other deduction and/or not work more than 15 hours a week. With HHA's previous history of hardship request for the minimum rent and the very small amount of imputed income that will be introduced we predict very little hardship requests.

### **Impact on protected classes and any disparate impact**

This waiver should not pose a disparate impact on any protected class as it is applied across the board to all families and excludes those who are elderly and disabled. HHA will track trends in hardship requests, along with whether they are granted and denied, and watch for any trends that may lead to the unfair treatment of a protected class.

**Financial Impact**

HHA will likely pay more money towards rents in the areas that rent-reasonableness determinations allow landlords to charge rents that are higher than the HUD Fair Market Rent publication for the Harrisburg Area. Currently HHA's Payment Standards are set at 105% of the HUD published Fair Market Rents (FMR) which includes utilities. Even after rent reasonableness determinations, on average HHA will pay 105% of the FMR. With this proposed waiver combined with new rent reasonable determinations HHA will allow landlords to set rents using FMR between 80%-120%. With higher FMR ranges HHA predicts it will spend more per voucher towards rents since the tenant will still be limited to paying only 40% of their gross income toward the rent.

**Affordability of Housing Costs for Families**

This change will not impact the amount that a family will pay towards their housing cost because their rent payment will be limited to 40% of their gross income just as before.

**Agency's waitlist**

HHA has been experiencing issues with voucher holders not being able to find places to use their vouchers. Hopefully, with the ability for landlords to charge higher rents more landlords will be part of the program and allow more vouchers to be utilized. This will allow HHA to have more vouchers in use and not have to open the waitlist as often to issue vouchers, and potentially allow the agency to get more vouchers.

**Agency's Termination Rate of Families**

Due to the fact that landlords will be approved for higher rents than they were previously, HHA predicts that this will keep more landlords in the program, and keep them from terminating section 8 tenants in favor of market rate tenants that they can charge higher rents. Therefore, the termination rate on Section 8 families will go down because less families will have vouchers terminated for failure to find a unit, and by landlords looking to get out of leases for minor violations by section 8 tenants.

**HCV utilization Rate**

By encouraging more landlords to join HHA's HCV program it is predicted that HHA will have a higher utilization rate for its vouchers because the tenants in the area will not be competing for the same landlords and limited units.

**Impact on MTW goals of cost effectiveness, self-sufficiency and housing choice.**

The main MTW statutory goal that this waiver will be meeting is housing choice. HHA's footprint is very small being only within the city limits of Harrisburg PA, and therefore the landlords available for voucher holders to rent from is small. HHA has been having issues getting landlords to join and stay in the program and one of the issues is their ability to charge rents comparable to the market rate rents. HHA plans to combat this by using this waiver in conjunction with the rent reasonableness waiver to allow landlords in our program to charge comparable rents and therefore incentivize more landlords to join, and increase housing choice for our tenants. Although HHA will likely be paying more towards some of the vouchers, by having more vouchers in use and less time reissuing or porting out vouchers HHA hopes that having more tenants in Harrisburg proves to be more cost effective in the long run.

**Impact on meeting MTW statutory requirements**

- Ensure 75% of households are very low-income
  - This waiver should not have an impact on meeting the 75% very low-income requirement, as the change in FMR does not change the individuals who apply for HHA's HCV waitlist, the majority of which qualify as very low-income.
- Establish a reasonable rent policy that encourages employment and self-sufficiency
  - This waiver does not have a large impact on meeting this requirement and is neutral. However, the rent reasonableness determination that is required will keep the rents affordable to our demographic.
- Continue to assist substantially the same total number of eligible low-income households
  - If any impact is made on this requirement the prediction is that with more landlords incentivized to use the program more households will be helped.
- Continue to assist a comparable mix of households by family size
  - This waiver should not have an impact on this requirement.
- Meet Housing Quality Standard requirements
  - This waiver should not have an impact on this requirement.

**Rate of Hardship Requests Granted or Denied**

Based on HHA's goal of incentivizing landlords we would not expect there to be very many hardship requests made because our goal in this first year will be to raise the FMR payment standard not lower it. Currently HHA's FMR Payment Standard is set at 105% HUD's FMR. Tenant's will still pay the same percentage of income for the rent and hopefully open the market to more units. However, if the FMR standard does go lower than 100% a tenant can ask for a hardship waiver to use the rent reasonableness calculation for the unit if that calculation is higher than the FMR standard and HHA will cover any additional rent over 40% of the tenant's income up to 100% of the FMR. During this year it is highly unlikely that a hardship will be requested.

**Impact on protected classes and any disparate impact**

This waiver should not pose a disparate impact on any protected class as it is applied across the board to all families and landlords using metrics based on FMR and Rent reasonableness not connected to the family or landlord's personal characteristics. However, HHA will take note of which landlords benefit from this waiver and see if there is any disparate impact that was not predicted on landlords or families.

**Financial Impact**

The cost implications to this waiver, are that the authority will likely spend more money and staff time in the initial start up of the program and funding of the vouchers for participants but as the program works and we utilize more vouchers as people move from the program and it expands it could either neutralize the cost or increase revenue.

**Affordability of Housing Costs for Families**

This will help not only expand housing choice for the homeless but allow them a step into being housed with support to allow them to grow while they reach a point at which they can take on the responsibility to pay for their housing. Affordability will be a key component to them being able to reach the goals of the program.

**Agency's waitlist**

HHA does not predict that this waiver will have much of an affect on the agency's waitlist but will add housing options so that the waitlist may move more quickly than before.

**Agency's Termination Rate of Families**

HHA predicts that the termination rate for families will not increase, and potentially decrease within the tenant's who enter through this program due to the involvement of supportive services and partnering organizations.

**HCV Utilization Rate**

HHA believes that this will increase the utilization rate of it's vouchers by providing more housing choices to more people.

**Impact on MTW goals of cost effectiveness, self-sufficiency and housing choice.**

This MTW waiver will have an impact on all three of the MTW goals. Once the program is up and running it will be cost effective by allowing HHA to use its vouchers in different ways than before so that our supportive service partners can help house their target populations. With the program having collaboration with service providers throughout the city it will promote self sufficiency. Lastly, housing choice will be opened for the program participants in the homeless community that was not previously seen in Harrisburg.

**Impact on meeting MTW statutory requirements**

- Ensure 75% of households are very low-income
  - This waiver should not have an impact on meeting the 75% very low-income requirement, as it will be targeted towards the lowest income populations.
- Establish a reasonable rent policy that encourages employment and self-sufficiency
  - This waiver will encourage employment and self sufficiency by requiring supportive services to be part of the program.
- Continue to assist substantially the same total number of eligible low-income households
  - This waiver should have the impact of assisting more eligible low-income households.
- Continue to assist a comparable mix of households by family size
  - This waiver should not have an impact on this requirement.
- Meet Housing Quality Standard requirements
  - This waiver should not have an impact on this requirement.

**Rate of Hardship Requests Granted or Denied**

Due to the amount of social, physical, mental, economic and barriers that the homeless population faces in getting stable housing, HHA predicts there will be multiple hardship requests. HHA plans on handling these requests in a way that allows participants the chance to continue in the program. If a participant is shown to have a valid circumstance that doesn't allow them to fit their prescribed program, it can be adjusted to fit their needs. Due to the collaboration of requests being brought by participants and supportive service coordinators the hardship requests will be reviewed in a way to be most beneficial to participants in meeting their housing goals.

**Impact on protected classes and any disparate impact**

This waiver should not pose a disparate impact on any protected class. HHA will track trends in hardship requests, along with whether they are granted and denied, and watch for any trends that may lead to the unfair treatment of a protected class.

### **Public Comments on MTW Supplement**

HHA held it's public meeting to discuss the Authority's Annual and 5 year plan, along with the MTW Supplement on September 29, 2022, at 5pm at our Central Office located at 351 Chestnut Street, Harrisburg PA 17101. The meeting was advertised in the local paper August 14th, 2022 and on HHA's website and Social Media pages. The Annual Plan, 5 Year Plan, and MTW Supplement along with attachments were all available for review. Tenants of Public Housing and Section 8 were individually mailed updates on the MTW Supplement. The Resident Advisory Board/ Tenant Associations were personally contacted for consideration on the Plans. We had fifteen people from the community attend the meeting, including residents, housing authority employees, and community organizations.

Questions and comment cards included the following:

1. How are you going to work with community agencies?
2. What are some loopholes that you will conquer?
3. What does HAP stand for?
4. How many units could you make Project Based prior to the change?
5. What if a tenant works in a field covered by the income exclusion, but the income is less than 40 hours a week at \$7.25?

## Response to Public Comments on MTW Supplement

HHA held its public meeting to discuss the Authority's Annual and 5 year plan, along with the MTW Supplement on September 29, 2022, at 5pm at our Central Office located at 351 Chestnut Street, Harrisburg PA 17101. The meeting was advertised in the local paper August 14<sup>th</sup>, 2022 and on HHA's website and Social Media pages. The Annual Plan, 5 Year Plan, and MTW Supplement along with attachments were all available for review. Tenants of Public Housing and Section 8 were individually mailed updates on the MTW Supplement. The Resident Advisory Board/ Tenant Associations were personally contacted for consideration on the Plans. We had fifteen people from the community attend the meeting, including residents, housing authority employees, and community organizations.

Below are HHA's Responses to the questions and comment cards included the following:

1. How are you going to work with community agencies?
  - a. Many of HHA's Project Based Voucher Waivers will help HHA support local agencies in projects that they want to build for low income residents and the homeless communities. Also HHA plans on specifically starting a short term housing program that uses community organizations as a key component for supportive services.
2. What are some loopholes that you will conquer?
  - a. It is HHA's plan to use waivers to help save administrative burden and to stop abuse of certain rules and regulations. For example the Acquisition without Prior HUD approval will stream line acquisitions. Elimination of Utility reimbursement will save administrative time and money without causing a hardship on the tenant.
3. What does HAP stand for?
  - a. Housing Assistance Payment
4. How many units could you make Project Based prior to the change?
  - a. 20% of a project
5. What if a tenant works in a field covered by the income exclusion, but the income is less than 40 hours a week at \$7.25?
  - a. The actual income will be used if the exclusion calculation does not benefit the tenant.

**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 (01/01/2023 \_\_\_), 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 identity, 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.

Harrisburg Housing Authority  
**MTW PHA NAME**

PA008  
**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).*

Peter Hammerk  
**NAME OF AUTHORIZED OFFICIAL**

Chairman  
**TITLE**

[Signature]  
**SIGNATURE**

10/13/22  
**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.*