

PHA Name : Harrisonburg

PHA Code : VA014

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

PHA Program Type: Housing Choice Voucher (HCV) only

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Harrisonburg Redevelopment and Housing Authority (HRHA) is a progressive agency experienced in providing housing for individuals with extremely low incomes, developing affordable housing, building community and coalitions, and revitalizing neighborhoods. HRHA is a leader in advocating for affordable housing and empowering self-sufficiency for residents. It provides service coordination and/or peer support services at all its residential properties.

HRHA's vision for the Moving to Work (MTW) program is to be a proactive, innovative agency that identifies, develops, and implements evidence-based housing policies that address local needs; increase self-sufficiency outcomes for participants; provide greater mobility and access to housing options, including supportive services; and promote efficiency and efficacy throughout service delivery and operations.

HRHA is implementing a rent reform and incentive program that will encourage and support participant self-sufficiency and increase landlord involvement through community-based services and incentives. Higher voucher use and retention, increased landlord participation and retention, and decreased administrative burden will improve cost effectiveness. MTW participation will allow HRHA to adapt to change and develop local solutions to address housing and self-sufficiency challenges. MTW goals and activities are:

1. Improve Program Cost Effectiveness & Reduce Administrative Burden

- Accept partner agencies' inspections to meet Housing Quality Standard (HQS) requirements. Using the Harrisonburg-Rockingham Community Services Board (HRCBS) and its certified HQS inspectors will save staff time by collaborating with a known, qualified agency to conduct inspections. This partnership will increase HRHA efficiency and allow staff to focus on more critical tasks that benefit tenants, to increase strategic initiatives, and to better coordinate efforts.

- Reduce the frequency of household certifications so participants keep more of their income increases. This also reduces the burden on participants and Housing Choice Voucher (HCV) specialists in acquiring, submitting, and processing paperwork. Switching to a triennial certification schedule and limiting interim certifications to one annually will save costs as currently interims are extremely time consuming for staff and stressful for residents. Tenants will have a longer time with consistent rent to allow better financial planning and housing security as well as a greater ability to save for life goals. The paperwork burden on voucher holders will lessen if they do not have to submit income and employment changes for incremental increases and fluctuations. HRHA voucher staff will group tenants into a logical certification schedule while still allowing tenants to request interim certification if needed.

- Simplify rent calculations for all non-elderly non-disabled households by:

- o Increasing minimum rent from \$50 to \$100;

- o Increasing total tenant payment to 35 percent of income; saving both time and money for participants and HRHA.

- o Eliminate child care deductions for non-elderly/non-disabled households.

- o Simplify the utility allowance schedule.

These simplifications make rent calculations more understandable for tenants. The changes save tenants' time and in many cases lower costs. Decreased staff paperwork allows more time to work with tenants, explore new projects, or participate in training in possible new areas or expanded services. Simplified paperwork also benefits landlords by determining household eligibility more quickly. Higher minimum rent encourages employment. Hardship exceptions are allowed when these changes create a rent burden.

- Require documentation of assets over \$50,000 only. Reducing documentation saves time for staff and the majority of tenants whose assets are below a level that makes a difference in qualifying for support.

- Eliminate the earned income disallowance and exclude school grants and school funding of all kinds from income for all non-elderly non-disabled households. This applies to students of any age, attending full time or part time. Scholarships; financial aid; grants and contributions from any source, including family members; work study income; and all other funding will be excluded and not counted as income. For non-student household members, income from dependents 20 and younger will not be included in the rent calculation. Wage income from household members 21 and older will be counted. This change saves staff and tenant time tracking receipts and doing repeated, changing calculations that do not significantly change tenants' situations.

- Increase the portability term in Franklin Heights units from one year to two years. This change increases the initial term of housing stability for residents and decreases the administrative burden for staff after initial intake.

2. Increase Participant Self-Sufficiency

- Replace the Family Self-Sufficiency (FSS) escrow model with a Goal Rewards Model where participants earn immediate cash incentives for reaching milestones related to income, finance, education, health, employment, and other self-sufficiency goals. Incentives immediately and tangibly reward participants for progress toward self-sufficiency and inspire them to take the next steps. Participants will have the choice to receive the incentive immediately via check or deposit the amount into an HRHA managed savings account. Increases in income will not be recorded and will not contribute to increases in escrow. There will be incentives based on maintaining and earning income, however they will not be directly tied to increases in income from start of program. Participants will be able to save faster for life goals while preserving the ability to use savings if necessary because of life events.

- Transition to a participant-driven coaching model that better supports and empowers participants in meeting their goals. This coaching model will give participants more ownership of their path forward while still providing needed guidance. It will increase collaboration and trust between staff and participants to make progress toward goals. These changes shift the

agency-participant relationship away from rule enforcement and toward life coaching. FSS staff will help participants clarify program goals based on their needs, abilities, and skills.

- Provide coaching support up to six months after a participant graduates from the FSS program. Continued support provides stability and familiarity during the challenges of transition, increasing participants' chances of success by maintaining a trusted relationship.

3. Increase Housing Choice

- Expand landlord recruitment and retention efforts to increase landlord participation by offering:

- o Security deposits up to one month's contract rent, once per tenant

- o Rent for empty units for one month

- o Damage coverage beyond the security deposit up to one month's rent

- o Payment incentives including a referring landlord bonus of \$250; a new landlord signing bonus of \$250; and a new contract bonus of \$250

These incentives will increase retention of current program landlords and attract new landlords by reducing risk of monetary loss. Security deposits will make landlords more willing to hold units for voucher participants. A larger reliable pool of landlords will help HRHA house more families more quickly and possibly reduce its large waiting list.

- Raise 1BR payment standard from current 110 percent of FMR to 120 percent. Raise accessible unit payment standard to 140 percent for units of all sizes for households requiring those features. HRHA will determine if unit qualifies. This change will increase housing choice in local tight rental market, especially for high demand 1BR units and scarce accessible units. It will also serve as an incentive for current and prospective landlords to participate.

- Provide more help with the housing search, including one-on-one support in locating affordable rentals. Cost will be covered by funding flexibilities. Targeted help will result in faster and better matches of renters to available units. These efforts will fill empty units more quickly, improving long term relationships with landlords. HRHA is considering using funding flexibility to create a dedicated housing locator on staff to customize housing searches more specifically to clients' needs.

- Increase the flexibility to project-base voucher (PBV) rental assistance up to the 50 percent maximum. Flexibility will allow HRHA to expand the number of vouchers available to project base, which will increase the number of housing options and units available for those with extremely low income. This change will allow for increased access for hard to find units, such as accessible one bedroom units. HRHA anticipates it will allow for the development of additional permanent supportive housing units. It will also increase administrative efficiencies and allow tenants to be housed more quickly when appropriate units are available.

- Remove the limits to the number of PBV units in property buildings. Removing these limits will allow HRHA to increase the number of units within a building without HUD approval. This change will increase the number of units available for extremely low income individuals needing deep rental assistance. It will provide for more flexible use of housing units and increased choice for tenants.

- Eliminate the procurement process for HRHA owned units. This change allows HRHA to use project-based vouchers to assist in renovating HRHA owned properties. The elimination reduces development costs and increases efficiencies for HRHA in renovating or developing new units in its tight housing market.

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

1. Tenant Rent Policies	
f. Minimum Rent (HCV)	Plan to Implement in the Submission Year
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Plan to Implement in the Submission Year
j. Alternative Utility Allowance (HCV)	Plan to Implement in the Submission Year
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
s. Elimination of Deduction(s) (HCV)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
b. Payment Standards- Fair Market Rents (HCV)	Plan to Implement in the Submission Year
3. Reexaminations	
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
h. Limit Portability for PBV Units (HCV)	Plan to Implement in the Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Plan to Implement in the Submission Year
e.HCV Policies for Addressing Increases in Family Income (HCV)	Plan to Implement in the Submission Year
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	

C. MTW Activities Plan that Harrisonburg Plans to Implement in the Submission Year or Is Currently Implementing

1.f. - Minimum Rent (HCV)	
The minimum rent will be set at \$100 for all non-elderly, non-disabled households. Along with the total package of tenant rent policy changes, these simplifications make rent calculations more understandable for tenants and still allow hardship	

exceptions if necessary. Increased minimum rent is offset to some degree by other changes and may encourage employment. The changes save tenant time and in many cases lower costs. Decreased staff paperwork allows more time to work with tenants, explore new projects, or participate in training in possible new areas or expanded services.

This MTW activity serves the following statutory objectives:

Cost effectiveness

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 only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

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

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.

NA - first year of activity

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

Attached Hardship policy applies to:

1.f. - Minimum Rent (HCV);1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV);1.s. - Elimination of Deduction(s) (HCV);2.b. - Payment Standards- Fair Market Rents (HCV);3.b. - Alternative Reexamination Schedule for Households (HCV)}

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Harrisonburg 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 Impact Analysis that applies to this MTW activity also applies to the following MTW activities:

1.f. - Minimum Rent (HCV);1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV);1.s. - Elimination of Deduction(s) (HCV)

minimum rent or minimum Total Tenant Payment (TTP) -

\$100

1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV)
<p>Raising TTP to 35 percent for all non-elderly non-disabled households and elimination of deductions for expenses, with some changes to income inclusions and exclusions. See Impact Analysis 1 for data. Legislation proposed in 2018 for HUD requested a 35 percent threshold: "(A) RENTS FOR FAMILIES.—Except as provided otherwise in this paragraph, a family shall pay as monthly rent for a dwelling unit assisted under this Act (other than dwelling units receiving tenant-based assistance under sections 8(o), 8(t), or 8(y)), the higher of— "(i) 35 percent of the family's monthly income; or "(ii) 35 percent of the amount earned by an individual working 15 hours a week for four weeks at the federal minimum wage..." Along with the total package of tenant rent policy changes, these simplifications make rent calculations more understandable for tenants and still allow hardship exceptions if necessary. Increased TTP is offset by other changes, and overall changes are designed to encourage employment for residents and increase efficiency for staff. The changes save tenant time and in many cases lower costs. Decreased staff paperwork allows more time to work with tenants, explore new projects, or participate in training in possible new areas or expanded services.</p>
<p>This MTW activity serves the following statutory objectives:</p> <p>Cost effectiveness</p>
<p>This MTW activity has the following cost implications:</p> <p>Neutral (no cost implications)</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>This MTW activity applies to:</p> <p>New admissions and currently assisted households</p>
<p>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).</p> <p>The MTW activity applies only to selected family types</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>NA - first year of activity</p>
<p>This MTW activity requires a Safe Harbor Waiver.</p> <p>The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).</p>
<p>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Harrisonburg MTW agency</p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
<p>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</p>

Percentage of income will equal 35.00% of the Total Tenant Payment (TTP)

Income basis for calculating Total Tenant Payment is :

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

1.r. and/or 1.s. "elimination of deductions";1.v. and/or 1.w "alternative inclusions and exclusions"

1.j. - Alternative Utility Allowance (HCV)

HRHA will create one utility allowance for all unit types. Allowance will still vary by bedroom size and by whether unit rent includes utilities. PBV units may have a separate utility allowance. Along with the total package of tenant rent policy changes, these simplifications make rent calculations more understandable for tenants and still allow hardship exceptions if necessary. Alternate utility allowance is balanced by other changes. The changes save tenant time and in many cases lower costs. Decreased staff paperwork allows more time to work with tenants, explore new projects, or participate in training in possible new areas or expanded services.

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.

NA - first year of activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Harrisonburg MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

HRHA will create one utility allowance for all unit types. Allowance will still vary by bedroom size and by whether unit rent includes utilities. PBV units may have a separate utility allowance. Along with the total package of tenant rent policy changes, these simplifications make rent calculations more understandable for tenants and still allow hardship exceptions if necessary. The changes save tenant time and in many cases lower costs. Decreased staff paperwork allows more time to work with tenants, explore new projects, or participate in training in possible new areas or expanded services. Specific utility calculations have been ordered from The Nelrod Company in June and are expected to be available soon.

1.n. - Utility Reimbursements (HCV)

Utility reimbursements under \$20 per month will be eliminated. Along with the total package of tenant rent policy changes, these simplifications make rent calculations more understandable for tenants and still allow hardship exceptions if

necessary. Eliminating utility reimbursements under \$20 is balanced to some degree by other changes. The changes save tenant time and in many cases lower costs. Decreased staff paperwork allows more time to work with tenants, explore new projects, or participate in training in possible new areas or expanded services.

This MTW activity serves the following statutory objectives:

Cost effectiveness

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.

NA - first year of activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Harrisonburg MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

1.s. - Elimination of Deduction(s) (HCV)

Deductions for unreimbursed childcare expenses will be eliminated for all non-elderly non-disabled households. Along with the total package of tenant rent policy changes, these simplifications make rent calculations more understandable for tenants and still allow hardship exceptions if necessary. This expense is claimed by under 3 percent of households. Eliminating deductions is balanced by other changes. The changes save tenant time and in many cases lower costs. Decreased staff paperwork allows more time to work with tenants, explore new projects, or participate in training in possible new areas or expanded services.

This MTW activity serves the following statutory objectives:

Cost effectiveness

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 only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

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

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.

NA - first year of activity

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, Harrisonburg 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.

Following deduction(s) will be eliminated, modified, or added.

Unreimbursed childcare costs

1.w. - Alternative Income Inclusions/Exclusions (HCV)

Simplifying reporting and verification of income by excluding incomes that are challenging to verify or calculate but have little impact on households in terms of what they can afford. Applies to all non-elderly non-disabled households. Eliminate the earned income disallowance and exclude school grants and school funding of all kinds from income. This applies to students of any age, attending full time or part time. Scholarships; financial aid; grants and contributions from any source, including family members; work study income; and all other funding will be excluded and not counted as income. For non-student household members, income from dependents 20 and younger will not be included in the rent calculation. Wage income from household members 21 and older will be counted. This change saves staff and tenant time tracking receipts and doing repeated, changing calculations that do not significantly change tenants' situations. Decreased staff paperwork allows more time to work with tenants, explore new projects, or participate in training in possible new areas or expanded services.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Self-sufficiency

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 only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

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
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>NA - first year of activity</p>
No hardship were requested in the most recent fiscal year.
<p>In the prior year, under this activity, Harrisonburg MTW agency</p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
<p>Following inclusions or exclusions will be eliminated, modified, or added.</p> <p>Eliminate the earned income disallowance and exclude school grants and school funding of all kinds from income for students of any age. For non-student household members, wage income from dependents 20 and younger will not be included in the rent calculation. Wage income from household members 21 and older will be counted in the rent calculation. Applies to non-elderly non-disabled households.</p>

2.b. - Payment Standards- Fair Market Rents (HCV)
<p>Raise 1BR payment standard to 120 percent. Raise accessible unit payment standard to 140 percent for all sized units for tenants requiring those features. Although this change will increase agency expenses, agency can manage the increase. This change will increase housing choice in local tight rental market, especially for high demand 1BR units and scarce accessible units of any size. It will also serve as an incentive for current and prospective landlords to participate. With 38 households searching for a 1BR unit, and 581 total households on the 1BR waiting list, this attempt to increase housing choice and number of accessible units is necessary in our tight rental market. HRHA will determine if units qualify as accessible using the following criteria: a unit that is designed and built to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design. HRHA will accept Type A or Type B units as classified within ANSI Section 1003 and ICC/ANSI A117.1, as amended.</p>
<p>This MTW activity serves the following statutory objectives:</p> <p>Housing choice</p>
<p>This MTW activity has the following cost implications:</p> <p>Increased expenditures</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>NA - first year of activity</p>
This MTW activity requires a Safe Harbor Waiver.

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
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, Harrisonburg 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.
Following will explain the payment standards by FMR: Following will explain the payment standards by FMR: Following will explain the payment standards by FMR: For 2022, FMR for 1BR voucher is \$723 currently. HRHA's 1BR voucher value will increase from the current \$795 (110 percent) per month to \$867 (120 percent) for a 1BR unit. Accessible unit payment standards (140 percent) will be: 1BR \$1,012; 2BR, \$1,331; 3BR, \$1,744; 4BR \$2,279; 5BR \$2,620 for tenants requiring those features.

3.b. - Alternative Reexamination Schedule for Households (HCV)
Household reexaminations once every 3 years. Interim decreases once per year when there is a 20 percent or more decrease of gross income for household total income. Households without employment income or social security received by head of household or co-head (zero income households) will have an interim when new income begins. Applies to all tenant based units and all properties with project based vouchers. Interim policy applies to everyone right away. Triennials will kick in one year after new admission. Reducing the frequency of household certifications allows participants to keep more income increases. It also reduces the burden on both participants and Housing Choice Voucher (HCV) specialists in acquiring, submitting, and processing paperwork. Currently interims are extremely time consuming for HCV staff and stressful for resident families. From July to December 2021, 333 interims were completed. 17 percent were household composition changes, rent increases, and other reasons. 37 percent were income increases. 46 percent were income decreases. Of the decreases, 11 percent were for 10 percent or less; 11 percent were for 10-20 percent; and the rest were over 20 percent. Setting a 20 percent threshold would not negatively affect a significant number of residents and would greatly increase staff efficiency. Legislation proposed in 2018 for HUD requested a 20 percent or more decrease as threshold: "Except as provided in clause (ii) and upon the request of a family, a public housing agency or owner is only required to conduct an interim reexamination of income if the family's income has decreased by 20 percent or more." This change gives tenants a longer time with consistent rent to allow for better financial planning and housing security. The paperwork burden on voucher holders will lessen if they do not have to submit income and employment changes for incremental increases and fluctuations. Tenants will have a greater ability to save for and accomplish life goals such as pursuing education and rent independence or home ownership. HRHA will group tenants into a logical certification schedule while still allowing tenants to request certification if needed. Improved staff efficiency will allow planning for new initiatives or needed training in existing or new areas of focus.
This MTW activity serves the following statutory objectives: 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.

NA - first year of activity

This MTW activity requires a Safe Harbor Waiver.

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

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, Harrisonburg 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 three years

Household may request 1 interim recertifications per year.

Interim decreases once per year when there is a 20 percent or more decrease of gross income for household total income.

For zero income households an interim will occur when new income begins, or after 3 months of zero income an interim

will be completed with income from previous certification.

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

At reexamination, the agency will allow the self-certification of assets up to \$50,000. Reduced documentation requirements will be cost effective by reducing staff time for processing, a primary goal, though in a secondary way, self reporting may empower and promote self sufficiency. Reducing documentation saves time for staff and the majority of tenants whose assets are below a level that makes a difference in qualifying for support. Decreased staff paperwork allows more time to work with tenants, explore new projects, or participate in training in possible new areas or expanded services.

This MTW activity serves the following statutory objectives:

Cost effectiveness

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.

NA - first year of activity
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Harrisonburg MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The dollar threshold for the self-certification of assets is \$50,000.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)
Vacancy loss of one month contract rent for the prior lease, upon execution of a new HAP contract. The only exclusion would be unit changes within the same owner's portfolio. These incentives will increase retention of current program landlords and attract new landlords by reducing risk of monetary loss, in this case for the time units are vacant. A larger reliable pool of landlords will help HRHA house more families more quickly and possibly reduce its large waiting list in our tight rental market.
This MTW activity serves the following statutory objectives: 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 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. NA - first year of activity
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Harrisonburg 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 \$\$Equivalent of one month of contract rent of the prior lease..
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)
Payment of up to one month of contract rent for damage claims, if cost of repairs exceeds security deposit, upon execution of a new HAP contract. Landlords must show intention to collect from household sufficient for HCV to hold household accountable to termination if needed. These incentives will increase retention of current program landlords and attract new landlords by reducing risk of monetary loss. This incentive will compensate for needed repairs or damages beyond the security deposit. A larger reliable pool of landlords will help HRHA house more families more quickly and possibly reduce its large waiting list in our tight rental market.
This MTW activity serves the following statutory objectives: 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 and currently assisted households
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 to all family types
The MTW activity applies to all tenant-based units
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. NA - first year of activity
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Harrisonburg MTW agency Received 0 hardship requests

<p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
<p>This policy applies to</p> <p>To all units</p>
<p>The types of units policy applies to:</p>
<p>Maximum payment to the landlord is</p> <p>\$\$Equivalent of one month of contract rent for prior lease..</p>
<p>0 payments were issued under this policy y in the most recently completed PHA fiscal year.</p>
<p>\$0 issued under this policy in the most recently completed PHA fiscal year.</p>

<p>4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)</p>
<p>Payment incentives including a referring landlord bonus of \$250; a new landlord signing bonus of \$250; a new contract bonus of \$250; and a security deposit, one time per tenant, of up to one month's rent. These incentives will increase retention of current program landlords and attract new landlords by reducing risk of monetary loss. Incentives will compensate for the time units are vacant and for needed repairs or damages beyond the security deposit. Security deposits will make landlords more willing to hold units for voucher participants. A larger reliable pool of landlords will help HRHA house more families more quickly and possibly reduce its large waiting list in our tight rental market.</p>
<p>This MTW activity serves the following statutory objectives:</p> <p>Housing choice</p>
<p>This MTW activity has the following cost implications:</p> <p>Increased revenue;Increased expenditures</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>This MTW activity applies to:</p> <p>New admissions and currently assisted households</p>
<p>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).</p> <p>The MTW activity applies to all family types</p>
<p>The MTW activity applies to all tenant-based units</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>NA - first year of activity</p>
<p>No hardship were requested in the most recent fiscal year.</p>

<p>In the prior year, under this activity, Harrisonburg MTW agency</p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
<p>This policy applies to To all units (Display selected and additional Pop up is complex logic.)</p>
<p>The types of units policy applies to:</p>
<p>Maximum payment to the landlord is</p> <p>\$\$Equivalent of up to one month of rent..</p>
<p>0 payments were issued under this policy y in the most recently completed PHA fiscal year.</p>
<p>\$0 issued under this policy in the most recently completed PHA fiscal year.</p>

<p>5.a. - Pre-Qualifying Unit Inspections (HCV)</p>
<p>Pre-qualifying unit inspections will increase HRHA efficiency, cost savings, and housing choice by allowing greater flexibility for lease up for the tenant and reducing unnecessary costs for re-inspections. HRHA anticipates implementation of this activity will increase ability of households to access housing, expand utilization, and reduce inspection costs.</p>
<p>This MTW activity serves the following statutory objectives:</p> <p>Cost effectiveness;Housing choice</p>
<p>This MTW activity has the following cost implications:</p> <p>Neutral (no cost implications)</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>NA - first year of activity</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Harrisonburg MTW agency</p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
<p>The pre-inspection is valid for</p>

60 days.

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

This third -party inspection collaboration will save staff time by using a known, qualified agency to conduct inspections. The Harrisonburg-Rockingham Community Services Board (HRCBSB) has certified HQS Inspectors on staff, and HRHA is looking to them for partner inspections. This partnership will increase HRHA efficiency and free some staff time to focus on more critical tasks that benefit tenants, to increase strategic initiatives, and to better coordinate efforts. This change will allow HRHA to operate more efficiently and strategically to serve its mission and focus on any new opportunities that arise.

This MTW activity serves the following statutory objectives:

Cost effectiveness

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.

NA - first year of activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Harrisonburg 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 – This policy provides authority for the HCVP manager to develop and implement procedures for the conduct of regularly scheduled quality control of other agencies' inspections. The HCVP manager will establish the sampling size and frequency within the procedures and designate the QC inspector roles and responsibilities. The executive director is the designated approval authority for HCVP QC procedures.

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

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

This flexibility will allow HRHA to expand the number of vouchers available to project base, which will increase the number of housing options and units available for those with extremely low income. This change will allow for increased access for hard to find units, such as accessible one bedroom units. HRHA anticipates it will allow for the development of additional permanent supportive housing units. It will also increase administrative efficiencies for HRHA and allow tenants to be housed more quickly when appropriate units are available. Project basing will also preserve existing affordable housing allowing for redevelopment of aging out housing developments.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Housing choice

<p>This MTW activity has the following cost implications:</p> <p>Increased revenue</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>NA - first year of activity</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Harrisonburg MTW agency</p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
<p>50.00% of total authorized HCV units will be authorized for project-basing.</p>

<p>9.b. - Increase PBV Project Cap (HCV)</p>
<p>Increasing PBV project caps will allow HRHA to increase the number of units within a building without HUD approval. It will provide for more flexible use of housing units and increased choice for tenants. This change will increase the number of units available for extremely low income individuals needing deep rental assistance. It will also preserve existing affordable housing allowing for redevelopment of aging out housing developments.</p>
<p>This MTW activity serves the following statutory objectives:</p> <p>Cost effectiveness;Housing choice</p>
<p>This MTW activity has the following cost implications:</p> <p>Increased revenue</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>NA - first year of activity</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Harrisonburg MTW agency</p> <p>Received 0 hardship requests</p>

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)

This change will allow HRHA to use project based vouchers to assist in renovating HRHA owned properties. The elimination will reduce development costs and increase efficiencies for HRHA in renovating or developing new units. Simplifying procurement will save administrative time and costs in the long run. It will also preserve existing affordable housing allowing for redevelopment of aging out housing developments.

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.

NA - first year of activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Harrisonburg 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)

Restrict moves from PBV units in Franklin Heights properties for 24 months. This change increases the initial term of housing stability for residents and decreases the administrative burden for staff after initial intake. The extended time from one to two years will allow for potential increase in household self-sufficiency due to the ability to participate in the Family Self-Sufficiency program. If tenants move out of Franklin Heights, they may not be able to continue in the program if space is not available. Participants still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules as outlined in existing agency HCV administrative plan.

This MTW activity serves the following statutory objectives:

Cost effectiveness

<p>This MTW activity has the following cost implications:</p> <p>Decreased expenditures</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>This MTW activity applies to:</p> <p>New admissions and currently assisted households</p>
<p>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).</p> <p>The MTW activity applies to all family types</p>
<p>This MTW activity applies to the following housing choice voucher unit types: Franklin Heights properties</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>NA - first year of activity</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Harrisonburg MTW agency</p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>

<p>10.d.HCV - Modify or Eliminate the Contract of Participation (HCV)</p>
<p>HRHA will modify the FSS contract of participation to reflect the removal of the traditional escrow model and the implementation of the new Goal Rewards Model. This involves modifying the following sections in the FSS Contract: FSS Escrow Account; Withdrawal of Funds from FSS Escrow Account; Loss of FSS Escrow Account; and HA Responsibilities. This change is part of a shift to a participant-driven coaching model that will give participants more empowerment and ownership of their path forward while still providing needed guidance. It will increase collaboration and trust between staff and participants to make progress toward goals. These changes shift the agency-participant relationship away from rule enforcement and toward life coaching. FSS staff will help participants clarify program goals based on their needs, abilities, and skills.</p>
<p>This MTW activity serves the following statutory objectives:</p> <p>Self-sufficiency</p>
<p>This MTW activity has the following cost implications:</p> <p>Neutral (no cost implications)</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</p>

The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
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 to all family types
This MTW activity applies to the following housing choice voucher unit types: Households participating in the FSS program
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. NA - first year of activity
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Harrisonburg MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

10.e.HCV - Policies for Addressing Increases in Family Income (HCV)
HRHA will replace the Family Self-Sufficiency (FSS) escrow model with a Goal Rewards Model. In the proposed model, participants earn immediate cash incentives for reaching milestones related to income, finance, education, health, employment, and other self-sufficiency goals. Incentives can immediately and tangibly reward participants for progress toward self-sufficiency and inspire them to take the next steps. Participants will have the choice to either receive the incentive immediately via check or deposit the amount into an HRHA managed savings account. At this time, increases in income will not be recorded and will not contribute to increases in escrow. There will be incentives based on maintaining and earning income, however they will not be directly tied to increases in income from start of program.
This MTW activity serves the following statutory objectives: Self-sufficiency
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.

NA - first year of activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Harrisonburg MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Following is how increased earnings is treated:

HRHA proposes modifying the FSS contract of participation to reflect the new escrow system, which includes a Goal Rewards Model based on achievement of self-sufficiency activities. This involves modifying the following sections in the FSS Contract: FSS Escrow Account; Withdrawal of Funds from FSS Escrow Account; Loss of FSS Escrow Account; and HA Responsibilities.

D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: Please see attached for Safe Harbor Waivers requested this year.

E.	Agency-Specific Waiver(s).
E.1	Agency-Specific Waiver(s) for HUD Approval: 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.
E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: MTW Agency does not have approved Agency-Specific Waivers

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
Income Level		Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income		
49%-30% Area Median Income		
Below 30% Area Median Income		
Total Local, Non-Traditional Households		0

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

G.2	Establishing Reasonable Rent Policy.

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

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

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

Family Size:	Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

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

I.	Evaluations.
No known evaluations.	

HRHA MTW Hardship Policy

This Hardship Policy applies to the following MTW activities:

- 1) Tenant Rent Policy – the changes affecting minimum rent; total tenant payment; and eliminated deductions.
- 2) Payment standards; and
- 3) Triennial recertification and interims.

Definition of Hardship Types

A ***HARDSHIP*** exists when:

The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program;

The family would be evicted as a result of the imposition of MTW activities;

The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;

The family has an increase in expenses because of changed circumstances, such as for medical costs, childcare, transportation, education, or similar items; and

Such other situations and factors determined by the agency to be appropriate.

NO HARDSHIP exists when:

HRHA determines there is no qualifying hardship

MTW activities will be reinstated, including requiring back payment of minimum rent and other costs or fees to HRHA for the time of suspension

TEMPORARY HARDSHIP exists when:

HRHA determines that there is a qualifying hardship but that it is of a temporary nature

The MTW activity will not be imposed for a period of 90 days from the date of the family's request

At the end of the 90-day period, the MTW activity will be imposed retroactively to the time of suspension

HRHA will offer a reasonable repayment agreement for any minimum rent back payment and any other costs and fees paid by HRHA on the family's behalf during the period of suspension

LONG-TERM HARDSHIP exists when:

The Housing Authority determines there is a long-term hardship

The family will be exempt from the MTW activity until the hardship no longer exists

The HRHA Hardship Policy allows the authority the flexibility to address unique, unforeseeable circumstances that may occur and to protect families in crisis. To be considered for a hardship exemption, the household must apply for all benefits for which it may be eligible. Zero income households must report income changes when income begins.

Until income is restored to the household, households must continue to meet the definitions of hardship types above and also meet all of the following criteria:

Remain in compliance with all program requirements

Not owe HRHA any money or be current with a re-payment agreement

Continued lack of income has not been through the fault of the household

Have applied for financial resources it may be eligible for but been unsuccessful in securing those

Request the hardship waiver within the deadline set by HRHA. Households have 10 business days from the date of their "Notice of Change" letter in which to request an Informal Hearing

Have not received hardship relief for the same MTW activity previously

Minimum rent - If paying 35% of the household's monthly adjusted income creates a hardship, households may pay reduced rent for some time period according to the policies and guidelines above for Hardship Types as determined by HRHA.

Elimination of Unreimbursed Child Care - The few households that may experience a hardship from the elimination of the Child Care deduction may make a request for rent reduction according to the policies and guidelines above for Hardship Types.

Each household is eligible for only one term of relief for each rent reform initiative. If the household qualifies for more than one relief at any given recertification (annual or interim), the reliefs will be calculated concurrently.

Payment Standards – HRHA is raising the 1BR payment standard to 120% and raising the accessible unit payment standard to 140% of FMR for units of all sizes only for families requiring those features. HRHA will determine if unit meets the following accessible qualifications: a unit that is designed and built to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design. HRHA will accept Type A or Type B units as classified within ANSI Section 1003 and ICC/*ANSI* A117.1, as amended.

Where payment standards cause a household hardship, HRHA will apply its Reasonable Accommodations policy.

Triennial Certification and Interim Requests – New recertification schedule will be once every three years. Households may request one interim recertification per year if they have a 20% or more decrease in total household income. Households at zero income will have an interim certification when new income begins, or after 3 months of zero income an interim will be completed with income from previous certification.

For households experiencing a hardship beyond these parameters, HRHA will consider classifying it as a long-term hardship according to the policies and guidelines above.

Voucher Portability

Portability for PBV units in Franklin Heights will be restricted to 24 months.

Move requests will be handled according to HRHA's existing Portability Policy. HRHA's Reasonable Accommodation Policy will still apply.

Requesting a Hardship Exception

The family must formally request a hardship exception by submitting a completed Request for Hardship Exception in written form to HRHA. Forms are available upon request at HRHA's administrative office.

If a family requests a hardship exemption, HRHA will suspend the MTW activity beginning the month following the family's hardship request. The suspension will continue until HRHA can determine whether hardship exists and whether the hardship is of a temporary or long-term nature. During suspension, the family will not be required to participate in relevant MTW activities and support will be adjusted accordingly.

Determination will be made as soon as possible but will not take longer than 10 business days.

If the request does not meet the hardship standards, MTW activities must resume and HRHA will collect any retroactive rent and other fees, if applicable, through a reasonable repayment agreement.

If the request does meet the hardship standards, HRHA will continue to provide an exemption from the MTW activity at a reasonable level and duration in accordance with its MTW policies.

Appeals

Families who disagree with the hardship review decision may appeal the determination through HRHA's existing grievance process. See HRHA Grievance Procedure attached below.

Notification of Residents

HRHA will:

Notify residents of its hardship policy at intake;

Review its hardship policy with residents at recertification; and

Consider if a resident qualifies for a hardship exemption when assistance is to be terminated due to an MTW activity.

Required Record Keeping

HRHA will preserve all records of hardship requests, determinations, and appeals for the duration of its MTW participation.

HRHA will maintain records to ensure traceability of activities and comply with all applicable regulations. When compliant and reasonable, documentation will be maintained in electronic format.

Records will be available for public review and inspection at the agency's principal office during normal business hours and supplied to HUD if requested.

GRIEVANCE PROCEDURE

EXHIBIT

I. PURPOSE AND SCOPE

This Grievance Procedure has been established to provide guidelines for Harrisonburg Redevelopment and Housing Authority ("Authority") residents in the just and effective settlement of grievances. As much as possible should be left to the mutual efforts of management and tenants, with both parties attempting to settle each grievance as quickly and justly as possible. This grievance procedure is incorporated into by reference all dwelling leases and will be furnished to all tenants and resident organizations. At least thirty (30) days' notice will be provided to tenants and resident organizations of any proposed changes to the grievance procedure, which will set forth the proposed changes and provide for an opportunity to present written comments, which will be considered by the Authority before any revisions are made to the grievance procedure.

II. APPLICABILITY

- A. Except as otherwise provided for in Section V.C., this Grievance Procedure shall be applicable to all individual grievances as defined in Section III.A. below, between the tenant and the Authority. In those jurisdictions which require that, prior to eviction, a tenant be given a hearing in Court containing the elements of due process, the Authority may exclude from its procedure any grievance concerning:
 - 1. Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees;
 - 2. Any violent or drug-related criminal activity on or off the premises; or
 - 3. Any criminal activity that resulted in felony conviction of a household member.
- B. The Authority reserves the right to amend any provision of this Grievance Procedure at any time with or without notice, as applicable, unless otherwise provided by federal, state or local law.

III. DEFINITIONS

For the purpose of this Grievance Procedure, the following definitions are applicable:

- a. Grievance -- "Grievance" shall mean any dispute which a tenant may have with respect to the Authority's action or failure to act in accordance with the individual

tenant's lease or the regulations of the Authority, which adversely affect the individual tenant's rights, duties, welfare or status, except as provided for in Section V.C. below.

- b. Complainant-- "Complainant" shall mean any tenant whose grievance is presented to the Authority's Management Office, in accordance with Section V below.
- c. Tenant-- "Tenant" shall mean any adult person (other than live-in aide) who resides in the unit and who executed the Lease with the Authority as lessee of the unit, or if no such person now resides in the unit, residents of the unit who is the remaining head of the household of the Tenant family residing in the unit.
- d. Documents --"Documents" shall include records and regulations.
- e. Good Cause -- "Good Cause" shall mean an unavoidable conflict that seriously affects the health, safety, or welfare of the Tenant.

IV. INFORMAL SETTLEMENT OF GRIEVANCE

Any grievance must be personally presented, either orally or in writing, to the Authority's Management Office of the housing project in which the Tenant resides, **within ten (10) days after the occurrence giving rise to the grievance**, so that the grievance may be discussed informally and an attempt can be made to settle the grievance without a formal hearing. As soon as the grievance is received, it will be reviewed by the Authority to ascertain that the event qualifies as a grievable issue. If the matter is not grievable, the Tenant will be notified in writing that the matter raised is not subject to the Authority's grievance procedure, with the reasons therefor stated.

If the matter falls under the grievance procedure, the Tenant will be contacted to arrange a mutually convenient time **within ten (10) working days** to meet so the grievance may be discussed informally and settled without a hearing. Within a reasonable time, **not in excess of ten (10) working days after presentation** of the grievance, a summary of the informal discussion shall be prepared by the Authority, and a copy thereof shall be provided to the Tenant and one retained in the Tenant's file. The summary shall be in writing and shall specify the names of the participants, dates of meeting, the nature of the proposed disposition of the grievance, and the specific reasons therefor, and shall specify the

procedures by which the Tenant may obtain a hearing if he/she is not satisfied by the proposed disposition of the grievance.

V. PROCEDURE TO OBTAIN A FORMAL HEARING

A. Obtaining a Hearing: If the Tenant is dissatisfied with the settlement arrived at in the informal hearing, the Tenant must submit a written request for a formal hearing to the Authority no later than **ten (10) days** after the summary of the informal settlement hearing is received. The written request shall specify:

1. The reason for the grievance;
2. The action of relief sought from the Authority; and
3. Several dates and times in the following ten (10) working days when the Tenant can attend a grievance hearing.

B. When Hearing Required: The Authority must give Tenant an opportunity for a formal hearing to evaluate whether the following Authority decisions relating to the Tenant's individual circumstances are in accordance with the law, HUD regulations, and the Authority's policies, as follows:

1. A determination of the family's annual or adjusted income, and the use of such income to compute the housing assistance payment;
2. A determination of the appropriate utility allowance (if any);
3. A determination of the family unit size under the Authority's subsidy standards;
4. A determination that a certificate program family is residing in a unit with a larger number of bedrooms than appropriate for the family unit size under the Authority's subsidy standards, or the Authority's determination to deny the Tenant's request for an exception from the standards;
5. A determination to terminate assistance (if applicable) for the Tenant because of the Tenant's action or failure to act; or
6. A determination to terminate assistance because the Tenant has been absent from the leased premises for longer than the maximum period permitted under the lease agreement;

The Authority must give the opportunity for a formal hearing before the Authority terminates housing assistance payments (if applicable) for the Tenant under an outstanding HAP contract under Sections V.B.4. through B.6. above (if applicable).

- C. Eligibility or Amount of Assistance Determinations: When the Authority makes a decision regarding the eligibility and/or the amount of assistance for Tenants, the Tenants must be notified in writing. The Authority will give the Tenant prompt notice of such determinations, which notice will include:
1. The proposed action or decision of the Authority;
 2. The date the proposed action or decision will take place;
 3. The Tenant's right to an explanation of the basis for the Authority's decision;
 4. The procedures for requesting a hearing if the Tenant disputes the action or decision;
 5. The time limit for requesting the hearing; and
 6. To whom the hearing request should be addressed.
- D. When Hearing Not Required: The Authority is not required to provide the Tenant an opportunity for a hearing for the following:
1. Discretionary administrative determinations by the Authority;
 2. General policy issues or class grievances;
 3. Establishment of the Authority schedule of utility allowances for Tenants in the program;
 4. An Authority determination not to approve an extension or suspension of a voucher term;
 5. An Authority determination not to approve a unit or tenancy;
 6. An Authority determination that an assisted unit is not in compliance with Housing Quality Standards ("HQS"). (However, the Authority must provide the opportunity for an informal hearing for a decision to terminate assistance for a breach of the HQS caused by the Tenant, as pursuant to the lease agreement);
 7. An Authority determination that the leased premises is not in accordance with HQS because of the family size;
 8. A determination by the Authority to exercise or not to exercise any right or remedy against the owner under a HAP contract (if applicable); or
 9. Disputes between tenants not involving the Authority.
- E. Notice to Tenant:
1. In grievances involving matters in Sections V.B.1. through B.3.,

the Authority must notify the Tenant that the Tenant may ask for an explanation of the basis of the Authority determination, and that if the Tenant does not agree with the determination, the Tenant may request a formal hearing on the decision.

2. In grievances involving matters in Sections V.B.4. through B.6., the Authority must give the Tenant prompt written notice that the Tenant may request a formal hearing. The notice must include:
 - a. A brief statement of the reasons for the decision;
 - b. A statement that if the Tenant does not agree with the decision, the Tenant may request an informal hearing on the decision; and
 - c. State the deadline for the Tenant to request hearing.

- E. Selection of Hearing Officer: Grievances shall be presented before a hearing officer or panel. A hearing officer or panel shall be appointed by the Authority. The hearing officer shall not be the person who made or approved the decision, or a subordinate of that person. The hearing officer or panel who conducts the hearing may regulate the conduct of the hearing in accordance with the Authority's hearing procedures, as set forth in Section VI of this Grievance Procedure.
- F. Failure to Request a Hearing: If the Tenant does not request a hearing in accordance with this Section V then the Authority's disposition of the grievance under this Section V shall become final, provided that failure to request a hearing shall not constitute a waiver by the Tenant of his/her right thereafter to contest the Authority's action in disposing of the Tenant in an appropriate judicial proceeding.
- G. Hearing Prerequisite: All grievances shall be personally presented, either orally or in writing, pursuant to the procedure prescribed in this Section V, as a condition precedent to a hearing under this section, provided, that if the Tenant shall show good cause why he/she failed to proceed in accordance with this Section V to the hearing officer, the provisions of this subsection may be waived by the hearing officer.

H. Escrow Deposit: Before a hearing is scheduled in any grievance involving the amount of rent, as defined in the lease agreement, which the Authority claims is due, the Tenant shall pay to the Authority an amount equal to the amount of rent due and payable as of the first of the month preceding the month in which the act or failure to act took place. The Tenant shall thereafter deposit the same amount of the monthly rent in an escrow account monthly until the complaint is resolved by decision of the hearing officer. These requirements may be waived by the Authority in extenuating circumstances. Unless so waived, the failure to make such payments shall result in a termination of the grievance procedure, provided that failure to make payment shall not constitute a waiver of any right the Tenant may have to contest the Authority's disposition of his grievance in any appropriate judicial proceeding.

I. Scheduling of Hearings: When the Authority receives a request for a formal hearing, a hearing shall be scheduled within in **ten (10) working days**. The notification of the hearing shall contain, notwithstanding anything to the contrary:

1. The date and time of the hearing.
2. The location where the hearing will be held.
3. The family's right to bring evidence, witnesses, legal or other representation at the family's expense.
4. The right to view any documents or evidence in the possession of the Authority upon which the Authority based the proposed action and, at the Tenant's expense, to obtain a copy of such documents prior to the hearing.
5. A notice to the Tenant that the Authority will request a copy of any documents or evidence the Tenant will use at the hearing.
6. The Authority's hearing or grievance procedures.

J. Failure to Appear: If the Tenant or Authority fails to appear at the scheduled hearing, the hearing officer or panel may make a determination to postpone the hearing for not to exceed five (5) days or make the determination that the party has waived its right to a hearing. Both the Tenant and Authority shall be notified of the determination

by the hearing officer or panel; however, a determination that the Tenant has waived his/her right to a hearing shall not constitute a waiver of any right the Tenant may have to contest the Authority's disposition in court.

VI. PROCEDURES GOVERNING THE HEARING

- A. Hearing Officer: The hearing shall be held before a hearing officer or panel of hearing officers.
- B. Hearing Procedures: As set forth in the Administrative Plan, the following hearing procedures shall be followed:
 - 1. The hearing shall concern only the issues for which the Tenant has received the opportunity for the formal hearing.
 - 2. No documents may be presented which have not been provided to the other party before the hearing if requested by the other party.
 - 3. The hearing officer may ask the Tenant for additional information and/or might adjourn the hearing in order to reconvene at a later date, before reaching a decision.
 - 4. If the Tenant misses an appointment or deadline ordered by the hearing officer, the action of the Authority shall take effect and another hearing will not be granted. The hearing officer will determine whether the action, inaction, or decision of the Authority is legal in accordance with HUD regulations and the Administrative Plan based upon the evidence and testimony provided at the informal hearing. Factual determinations relating to the individual circumstances of the Tenant will be based on a preponderance of the evidence presented at the informal hearing.
 - 5. At the hearing, the Tenant must first make a showing of an entitlement to the relief sought, and thereafter the Authority must sustain the burden of justifying the Authority's action or failure to act against which the complaint is directed.
 - 6. The hearing shall be conducted informally by the hearing officer, and oral or documentary evidence pertinent to the facts and issues raised by the complaint, may be received without regard to

admissibility under the rules of evidence applicable to judicial proceedings. The hearing officer shall require the Authority, the Tenant, counsel and other participants or spectators to conduct themselves in an orderly fashion. Failure to comply with the directions of the hearing officer or hearing panel to obtain order may result in exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting or denial of the relief sought, as appropriate.

C. Fair Hearing for Tenant: The Tenant shall be afforded a fair hearing, providing the basic safeguards of due process, which shall include:

1. The opportunity to examine before the hearing, and, at the expense of the Tenant, to copy all documents, records and regulations of the Authority that are relevant to the hearing;
2. The right to be represented by counsel or other person chosen as his/her representative at his/her own expense;
3. The right to a private hearing unless the Tenant requests a public hearing;
4. The right to present evidence and arguments in support of his or her complaint to controvert evidence relied on by the Authority or management relies;
5. Present any information or witnesses or question any witnesses pertinent to the issue of the hearing;
6. Request that the Authority's staff be available to present at the hearing to answer questions pertinent to the case;
7. A decision based solely and exclusively upon the facts presented at the hearing.

D. Authority's Rights: Notwithstanding any other rights contained in this Grievance Procedure and the Administrative Plan, the Authority has a right to:

1. Present evidence, witnesses and any information pertinent to the issue at the informal hearing;
 2. Be notified if the Tenant intends to be represented by legal counsel, an advocate, or other party;
 3. Examine and copy any documents to be used by the Tenant prior to the informal hearing;
 4. Have its attorney present at the hearing; and
 5. Have staff persons and other witnesses familiar with the case present at the hearing.
- E. Rescheduling of Hearing: After the hearing date is set, the Tenant may request to reschedule only upon showing Good Cause.
- F. Transcript of the Hearing: The Tenant or the Authority may arrange, in advance and at the expense of the party making the arrangement, for a transcript of the hearing. An interested party may purchase a copy of such transcript.
- G. Accommodation: The Authority will provide reasonable accommodation for persons with disabilities to participate in the hearing. Reasonable accommodation may include qualified sign language interpreters, readers, accessible locations, or attendants.

VII. DECISION OF THE HEARING OFFICER

- A. Decision: The hearing officer shall prepare a written decision **within ten (10) working day after the hearing** and shall include:
1. A clear summary of the decision and the reasons for the decision;
 2. If the decision involves money owed, the amount owed and documentation of the calculation of the monies owed; and
 3. The date the decision goes into effect.
- B. Copies of the Decision: A copy of the decision shall be sent to the Tenant and the Authority. The Authority shall retain a copy of the decision in the Tenant's folder. A copy of such decision, with all names and identifying references deleted, shall be maintained on file by the Authority and made available for inspection by a prospective Tenant, his/her representative, or the hearing officer.

- C. Binding Effect of Hearing decisions: The decision of the hearing officer or panel shall be binding on the Authority, which shall take all actions, or refrain from any actions, necessary to carry out the decision, **UNLESS** the Authority Board of Commissioners within a reasonable time, **not to exceed ten 10 working days**, determines that:
1. the grievance does not concern Authority action or failure to act in accordance with or involving the Tenant's lease or Authority regulations which adversely affect the Tenant's rights, duties, welfare, or status;
 2. the grievance concerns matters in which the Authority is not required to provide an opportunity for a hearing;
 3. the decision conflicts with or contradicts federal, state, or local regulations or requirements;
 4. the decision conflicts with or contradicts HUD regulations or requirements; or
 5. the decision exceeds the authority of the person conducting the hearing.

The Authority shall be bound, unless it is determined that the Authority is not bound by the hearing officer's determination and the Authority sends a letter to the Tenant within ten (10) business days of the hearing officer's notification to the Tenant. The letter shall include the Authority's reasons for the decision as stated above.

A decision by the hearing officer in favor of the Authority or which denies the relief requested by the Tenant in whole or in part shall not constitute a waiver of, nor affect in any manner whatever, any rights the Tenant may have to a trial de novo or judicial proceedings, which may thereafter be brought in the matter.

VIII. AUTHORITY EVICTION ACTIONS

If a tenant has requested a hearing in accordance with Section V on a complaint involving a notice of termination of the tenancy, and the hearing officer upholds the Authority's action to terminate the tenancy, the Authority shall not commence an eviction action in a state or local court until it has served a notice to vacate on the tenant, and in no event shall the notice to vacate be issued prior to the decision of the hearing officer having been mailed or delivered to the Tenant. Such notice to vacate must be in writing and specify that if the tenant fails to quit the premises within the applicable statutory period, or by the termination date stated in the notice of termination, whichever is later, appropriate action will be brought against him/her and he/she may be required to pay court costs and attorney's fees.

Impact Analysis

Activity	Tenant Rent Policies 1f. Minimum rent 1h. Tenant payment as modified percentage of income 1s. Elimination of deductions Minimum rent will be \$100 and TTP will increase to 35% of income for all non-elderly, non-disabled households. Eliminate unreimbursed childcare expense deductions. Applies to all non-elderly, non-disabled households.
1. Describe the activity's impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)	
Totality of changes should be neutral, not expected to impact agency finances significantly. Anticipated benefit to the agency due to anticipated increase in voucher utilization. Possible staff time savings/admin costs savings in the long term.	
2. Describe the activity's impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs);	
Housing costs will increase moderately for most households, and not at all for some. See analysis of sampling of households attached. Households will more easily understand simplified calculations. Increased minimum rent and TTP are expected to act as an incentive for employment along with the implementation of a triennial certification process. Changes allow for greater housing choice and increased access to housing due to a clear understanding from landlords and households of tenant rent responsibilities. Increased access to housing is anticipated due to the ability of households to use more of their income to access housing.	
3. Describe the impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist);	
No impact	
4. Describe the impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency);	
Impact should be minimal due to total package of changes balancing each other out and hardship policy coverage for those who need it.	
5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program	
None expected	
6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice;	
Simplifications make rent calculations more understandable for tenants and allow hardship exceptions if necessary. Changes save tenant time and in many cases decrease costs. Increased minimum rent and TTP expected to act as incentive for employment. Changes save staff and tenant time doing repeated, changing calculations that do not significantly change tenants' situations. Staff time/admin cost savings allows more	

Impact Analysis

time to work with tenants and explore new projects. Anticipate tenants having increased housing choice due to clarity in understanding household funds needed for housing. Allows for landlords to understand household rent responsibilities. Reduces the need for staff to calculate housing feasibility.

7. Describe the impact on the agency's ability to meet the MTW statutory requirements;

None expected

8. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity; and

No significant change expected due to total package of activities. Hardship policy is in place to protect those who need it, such as the few families affected by losing certain deductions. Agency will track and document hardship requests so as to adjust program design, better clarify requirements, or clear up misunderstandings for participants if necessary.

9. Across the other factors above, describe the impact on protected classes (and any associated disparate impact)

None expected.



Rent Policy Waiver – Examples of Impacts

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment Percent of Income	Total Tenant Payment (rounded)
Adult + 1 minor dependent	Monthly Income \$944	Current	\$480	\$10,848	904	30%	\$271
	Annual Income (monthly x 12) \$11,328	MtW	\$480	\$10,848	904	35%	\$316

Monthly
change:
\$45 increase

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment % of Income	Total Tenant Payment (rounded)
Adult with 3 Dependent Minors, no childcare	Monthly Income \$2,200	Current	\$1,400	\$24,960	\$2,080	30%	\$624
	Annual Income (monthly x 12) \$26,400	MtW	\$1,400	\$24,960	\$2,080	35%	\$728

Monthly
change:
\$104 increase





Rent Policy Waiver – Examples of Impacts

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment Percent of Income	Total Tenant Payment (rounded)
2 Adults + 4 Dependent Minors, no childcare expenses	Monthly Income \$1,500	Current	\$1,920	\$16,080	\$1,340	30%	\$402
	Annual Income (monthly x 12) \$18,000	MtW	\$1,920	\$16,080	\$1,340	35%	\$469

Monthly
change:
\$67 increase

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment % of Income	Total Tenant Payment (higher of % income or MINIMUM RENT)
Zero Income Family	Monthly Income \$0	Current	\$0	\$0	\$0	30%	\$50
	Annual Income (monthly x 12) \$0	MtW	\$0	\$0	\$0	35%	\$100

Monthly
change:
\$50 increase





Rent Policy Waiver – Examples of Impacts

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment % of Income	Total Tenant Payment (rounded)
1 Adult with 2 Dependent Minors, childcare deduction	Monthly Income \$1,800	Current	\$2,400	\$19,197	\$1,600	30%	\$480
	Annual Income (monthly x 12) \$21,597	MtW	\$960	\$20,637	\$1,720	35%	\$602

**Monthly
change:
\$122 increase**

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment Percent of Income	Total Tenant Payment (rounded)
1 Adult with 1 Dependent Minor, childcare deduction	Monthly Income \$2,109	Current	\$3,080	\$22,223	\$1,852	30%	\$556
	Annual Income (monthly x 12) \$25,303	MtW	\$480	\$24,823	\$2,069	35%	\$648

**Monthly
change:
\$92 increase**





Rent Policy Waiver – Examples of Impacts

Activity 1s – Elimination of Unreimbursed Childcare Deduction

HRHA has 22 non-elderly, non-disabled families claiming a childcare expense out of 806 total families.

Of those 22 families:

4 receive assistance thru DSS for childcare expenses;

- for most families, the new combined utility allowance will increase and help offset the removal of the childcare deduction;
- for any remaining families, a hardship waiver is available for the expense.

Rent changes for non-elderly, non-disabled families are balanced by reduced certification frequency: increases in income will not trigger a subsequent interim to increase rent portion

Hardship waivers are in place to specify when & how to make exceptions



MTW Safe Harbor Waiver Request

Harrisonburg Redevelopment and Housing Authority – VA014

HRHA requests a Safe Harbor Waiver for the following group of MTW activities.

1. Tenant Rent Policies

The agency is authorized to adopt and implement the activities listed below for setting tenant rents in public housing, including but not limited to establishing definitions of income and adjusted income that differ from those in the current 1937 Act and its implementing regulations. The agency is authorized to adopt and implement the activities listed below to establish total tenant payments (TTP)¹ in the HCV program, and/or tenant rents for tenant-based and project-based voucher (PBV) assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The agency is authorized to adopt and implement the activities listed below to calculate the tenant portion of the rent in a way that differs from the currently mandated program requirements in the 1937 Act and its implementing regulations. The agency must determine initial eligibility in accordance with 24 CFR 5.609 and must comply with section 3(b)(2) of the United States Housing Act of 1937 Act (1937 Act) (42 U.S.C. §1437). For voucher activities, the Department has developed a standard rider to the HAP contract that reflects any MTW authorizations that amend the current requirements of the HAP contract.

1h Total Tenant Payment. Increase total tenant payment to **35 percent of income** for all non-elderly, non-disabled households.

Statutes and Regulations Waived

Tenant Payment as a Modified Percentage of Income (HCV) - Certain provisions of sections 3(b)(4)-(5) and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.609, 5.611, and 982.516.households.

Safe Harbors

1.g. and 1.h. i. The Tenant Payment in public housing and the Tenant Payment in HCV must not exceed 32% of income for non-elderly/non-disabled families if the agency is utilizing flexibility under activities 1.r., 1.t. and/or 1.v. (for 1.g.) or 1.s., 1.u. and/or 1.w. (for 1.h.).

ii. The Tenant Payment in public housing and the Tenant Payment in HCV must not exceed 35% of income for non-elderly/non-disabled families if the agency is not utilizing flexibility under activities 1.r., 1.t. and/or 1.v. (for 1.g.) or 1.s., 1.u. and/or 1.w. (for 1.h.).

iii. Agency must exempt elderly and disabled families from rent policy.

iv. Agency must conduct an impact analysis. *

v. Agency must implement a hardship policy. *

Requested Waiver and Explanation

Total tenant payment request is **35 percent of household income using flexibilities under 1s and 1w**, which is outside the Safe Harbor maximum of 32 percent. Hardship policy is in place for households who face rent burden. Applies to all non-elderly non-disabled households.

HRHA believes this total package of changes is necessary to achieve maximum staff efficiency and cost effectiveness under MTW flexibilities. The combination of changes encourages employment and self-sufficiency without significantly increasing overall costs for households. These simplifications make rent calculations more understandable for tenants. The changes save tenants' time and in many cases lower costs. Decreased staff paperwork allows more time to work with tenants, explore new projects, or participate in training in possible new areas or expanded services. Simplified paperwork also benefits landlords by determining household eligibility more quickly.

See Impact Analysis and Hardship Policy attached.

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-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.

Harrisonburg Redevelopment and Housing Authority

VA014

MTW PHA NAME**MTW PHA NUMBER/HA CODE**

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

Dany Fleming

Chair, Board of Commissioners

NAME OF AUTHORIZED OFFICIAL**TITLE**
SIGNATURE9/28/22
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.*

**Certification of Consistency
with the Consolidated Plan****U.S. Department of Housing
and Urban Development**

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.
(Type or clearly print the following information:)

Applicant Name: Harrisonburg Redevelopment & Housing AuthorityProject Name: HRHA (VA-014) Supplement for Move to Work Expansion-Cohort #Location of the Project: 286 Kelley Street, Harrisonburg, VA 22802Name of the Federal
Program to which the
applicant is applying: Move to Work Demonstration - Cohort #1Name of
Certifying Jurisdiction: City of HarrisonburgCertifying Official
of the Jurisdiction
Name:Alexander Banks IITitle: Interim City Manager

Signature:

Alexander Banks II

Date:

10/5/2022