

PHA Name : Madison Housing Authority

PHA Code : NJ105

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 4/1/2023

PHA Program Type: Housing Choice Voucher (HCV) only

MTW Cohort Number: Asset Building

MTW Supplement Submission Type: Amended Annual Submission

B. MTW Supplement Narrative.

Through our participation in this MTW cohort, MHA plans to help participants build and leverage their positive financial capacity and increase the impact of financial decisions for their futures. As described below, the Madison Housing Authority's overall vision for its Moving to Work (MTW) program focuses on the three statutory objectives of the MTW Demonstration Program – cost effectiveness, self-sufficiency and housing choice.

Cost Effectiveness: Through increased escrow accounts and savings, MHA hopes to help voucher-assisted tenants increase their on-time rent payments. We see the range of interventions and activities in our proposal as an effective approach to reducing the administrative costs associated with a series of communications and interventions that take place when renters are not current on their rent due to financial instability and insufficient savings. Our participation in this MTW cohort to establish and improve households' savings will also help improve families' successful leasing rates. During their participation in the voucher program, if there are family circumstances that lead to reductions in hours worked or decreased income, without increased savings there could be an associated increase in potential late rent and/or utility payments, eviction, informal reviews and hearings, etc. We hope to reduce such occurrences through the interventions described in our proposal.

MHA has a good track record of managing our voucher programs with the available HAP from HUD each year. From 2020 through the present, due to COVID-19 and rapidly rising rental markets, our conservative estimate as an annual average for 2022 is that we will fully utilize our HAP budget authority and maintain a voucher lease-up rate of 95 percent or higher. However, there are a number of challenges serving low-income tenants in our community, including a range of impacts on rental housing markets and utility cost inflation stemming in part from COVID-19. The comparable private rental housing market data for Morris County shows that rents in April 2022 vs. April 2021 were 13 percent greater.

Currently, MHA does not have all of the landlord partners that we might attract with additional tools. Incentivizing landlords to participate in our voucher program through the MTW waivers and MHA's activities described below will help us increase landlord participation and create more housing choice and affordability for voucher holders within our community. By utilizing a broader range of FMR and/or SAFMR payment standards and building financial stability through escrow account and asset development initiatives, we believe that we have a unique opportunity to increase housing accessibility and affordability to greater numbers of our participants.

Well-calibrated voucher payment standards based on the increased FMR and/or SAFMR will help MHA maximize our ability to lease as efficiently and effectively as possible and to achieve other voucher program goals. In the past, MHA has not received enough Housing Assistance Payment (HAP) funding to fully utilize the number of authorized vouchers. However, with the MTW expansion flexibility that we have selected, including FMR and/or SAFMR-based payment standards, over time MHA plans to have more cost-effective programs both in terms of rent subsidy and administrative costs that will allow us to serve more households while better serve the needs of our current participants.

With high demand for affordable housing in Morris County and long waiting lists for HUD programs, it is important to MHA to serve as many unassisted households as possible. MTW flexibility will serve to enhance our existing practices. MHA will explore flexibility in the implementation of its FSS program with activities tied to the asset building focus of our MTW plan, tiered rents, alternative reexamination schedule for households, and FMR and/or SAFMR-based payment standards with MTW flexibility. These flexibilities will allow MHA to assist more households to become self-sufficient and, in so doing, we will be able to serve more unassisted households each year.

Through a combination of the cohort specific and MTW waivers and activities under HUD's MTW Operations Notice that we have selected for future implementation, safe harbor waivers, agency-specific waivers, and our current and future non-MTW activities, MHA will be able to implement a more comprehensive approach to administering our voucher program. This, in turn, will improve our lease-up rate and we anticipate the ability to achieve 100% lease up with these critical MTW flexibilities. If we accomplish this goal of 100% voucher utilization through selection for HUD's Asset Building Cohort and MTW expansion authority, MHA will seek opportunities to apply for additional vouchers in the future, so that we can house additional eligible unassisted applicant households.

Self-Sufficiency: By designing a system for tenants to earn and invest in their needs as they determine, they increase in self-sufficiency and MHA benefits financially when tenants increase their earnings. In this way, PHA and tenant outcomes are tied together.

MHA seeks to increase voucher-assisted tenants' ability to meet their rent and utility payments, but also to invest in educational and employment needs that increase financial stability and self-sufficiency. Asset building provides low-income families with a financial buffer from unanticipated and anticipated expenses in their lives, as well as providing the ability to invest in their education, employment, health, training, transportation, etc. We anticipate that tenants' increased escrow savings accounts will lead to gains in on-time rent payments. With increased savings, more ability to meet essential household needs and overall improvement to household financial health, tenants may also improve their credit. MHA's

actions in this MTW Asset Building cohort offer a viable and important opportunity for low-income tenants to achieve financial resilience, economic mobility, and sustained wealth creation and protection.

Although increased incomes may not be the explicit or initial goal of MHA's proposed interventions, and more robust study is needed, it is our hope that individual participants' average annual incomes will also increase over time, decreasing the amount of rent subsidy needed to supplement their rent, allowing MHA to serve more eligible unassisted households.

Housing Choice: MHA seeks to help voucher-assisted tenants increase their housing choices by helping them increase their escrow accounts and asset position. Timely rent payments help tenants establish good landlord-tenant histories, benefiting tenants in the property owner applicant screening process. This is an essential factor in tenants securing greater affordable housing choice and options. We also view the range of interventions and activities in our proposal as an effective approach for eviction prevention, financial stability and housing stability. When households have improved savings, they are more likely to have the money needed to pay their rent and/or utilities and avoid late fees, legal fees and costs associated with eviction. Needless to say, eviction records also have a substantial adverse impact on tenants' future housing choices.

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	
o. Initial Rent Burden (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	
a. Payment Standards- Small Area 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
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
d. Alternative Inspection Schedule (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
d. Alternative PBV Selection Process (HCV)	Plan to Implement in the Submission Year
f. Increase PBV HAP Contract Length (HCV)	Plan to Implement in the Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
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	
b. Service Provision	Plan to Implement in the Submission Year
c. Housing Development Programs	Plan to Implement in the Submission Year

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

1.o. - Initial Rent Burden (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
Description:
MHA may waive the maximum family share at initial occupancy of 40% of the family's monthly income, but not to exceed 45% of their monthly income.
Agency goals for MTW Activity:

MHA's goal for this activity is to increase family choice at initial occupancy by allowing households to pay more than 40% of their income towards rent for their initial occupancy. This may assist households choosing to move to relatively higher cost opportunity areas, and eligible applicant households leasing in-place who may have income to housing cost burdens of that are greater than 40% of income. Studies have also show that eligible applicant households' first move may involve higher income to house cost burdens, but after their initial year of occupancy with the benefit of voucher assistance their subsequent moves tend to be at relatively lower income to housing cost burdens an in areas with greater neighborhood opportunities for them.

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

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

If the MTW agency plans to implement a new maximum income-based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?

45.00%

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

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

Description:

MHA seeks to establish alternative policies to exclude certain forms of participant income in tenant rent calculations.

At initial eligibility determination (or initial certification where the family is being rescreened for assistance), an applicant household's ownership of net family assets that exceed \$100,000 (as adjusted for inflation) or ownership of disqualifying real property require denial of assistance. MHA does not have the discretion to waive or alter enforcement of the HOTMA Section 102 asset limitation at admission.

However, after initial eligibility determination has been completed (or initial certification where the family is being rescreened for assistance), for voucher holders' initial lease-up, annual/biennial/triennial reexaminations (as applicable), transfer of unit and interim recertifications, MHA will adopt a total non-enforcement policy for purposes of verifying assets, imputing or adding actual income or interest derived from assets or including it in tenant income and rent calculations. Information related to assets will be collected at initial eligibility certification (or initial certification where the family is being rescreened for assistance) for the purpose of determining that family assets complying with HOTMA Section 104 asset

limits. Income from assets will not be considered as part of the income/rent calculation formula in the initial rent calculation or subsequent triennial, annual and interim recertifications, and transfer of unit, as applicable. In other words, after initial asset eligibility has been determined in accordance with HOTMA Section 104, asset information will not be requested, captured or certified by MHA or included in calculating tenant rent portion.

All existing voucher-assisted households will be exempt from having assets (after factoring out all of the asset exclusions in 5.609(b) described below) counted towards their income for purposes of calculating their total tenant payment at their regular re-examination.

With the adoption of a policy that disregards assets and asset income in rent calculations, MHA would be required to obtain and verify additional information about owned real property strictly to determine whether it qualifies for an exemption under § 5.618 (e.g., whether owned real property is suitable for occupancy). For example, if a family owns real property, that real property would be included in the calculation of total net family assets, unless specifically excluded by § 5.603, and MHA would undertake a determination as to whether the family's real property was suitable for occupancy.

Madison, NJ is a high-cost community. This waiver would benefit all family types, including but not limited to elderly and disabled families and individuals.

Agency goals for MTW Activity:

Decrease administrative time and costs required to request, obtain, and follow up on tenant submission of asset documents, allowing staff to focus on other priorities.

This waiver may improve cost effectiveness in our effort to reduce the administrative burden. Staff spend substantial amounts of administrative time verifying assets. By excluding the asset submission, certification and verification process, MHA will free up staff time to accomplish other tasks. Additionally, this waiver will decrease burdensome documentation for participants, lowering barriers to participation.

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

Self-sufficiency; Housing choice

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

Decreased revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

N/A

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

Yes

What is the status of the Safe Harbor Waiver request?

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

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

At initial eligibility determination (or initial certification where the family is being rescreened for assistance), an applicant household's ownership of net family assets that exceed \$100,000 (as adjusted for inflation) or ownership of disqualifying real property require denial of assistance. MHA does not have the discretion to waive or alter enforcement of the HOTMA Section 104 asset limitation at admission.

However, after initial eligibility determination has been completed (or initial certification where the family is being

rescreened for assistance), for voucher holders' initial lease-up, annual/biennial/triennial reexaminations (as applicable), and interim recertifications, MHA will adopt a total non-enforcement policy for purposes of verifying assets, imputing or adding actual income or interest derived from assets or including it in tenancy income and rent calculations. Information related to assets will be collected at initial eligibility certification (or initial certification where a family is being rescreened for assistance) for the purpose of determining that the family assets comply to HOTMA Section 104 asset limits. Income from assets will not be considered as part of the income/rent calculation formula in the initial rent calculation or subsequent triennial, annual and interim recertifications, as applicable. In other words, after initial asset eligibility has been determined in accordance with HOTMA Section 104, asset information will not be requested, captured or certified by MHA OR included in calculating tenant rent portion.

All existing voucher-assisted households up will be exempt from having assets (after factoring out all of the asset exclusions in 5.609(b)) counted towards their income for purposes of calculating their total tenant payment at their regular re-examination.

With the adoption of a policy that disregards assets and asset income in rent calculations, MHA would be required to obtain and verify additional information about owned real property strictly to determine whether it qualifies for an exemption under § 5.618 (e.g., whether owned real property is suitable for occupancy). For example, if a family owns real property, that real property would be included in the calculation of total net family assets, unless specifically excluded by § 5.603, and MHA would undertake a determination as to whether it was suitable for occupancy.

Madison, NJ is a high-cost community. This waiver would benefit all family types, including but not limited to elderly and disabled families and individuals.

2.a. - Payment Standards- Small Area Fair Market Rents (HCV)

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

Description:

This activity will allow MHA to adopt and implement a reasonable policy to establish payment standards based upon applicable Small Area Fair Market Rents (SAFMRs). MHA may use this flexibility to establish payment standards between 80% and 150% of the applicable SAFMRs in ZIP code 07940, based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc., or may establish payment standards for each ZIP code within its jurisdiction. Among the geographic considerations is grouping ZIP codes within SAFMRs.

Agency Goals for the MTW Activity:

MHA's goal is to utilize a comprehensive approach to expand housing opportunities for HCV participants and to increase landlord participation in the HCV Program.

For MHA to increase the number of families served, maintaining affordable income to housing cost burdens overall, ensuring good housing quality stock and providing opportunities to lease in opportunity areas, utilizing SAFMRs as the basis for MHA's payment standards within the 80% to 150% range in ZIP code 07940, in conjunction with its "rent reasonableness" system is intended to help achieve these goals. Over time, the use of SAFMR-based payment standards that are more finely attenuated to submarkets within MHA's service area. This will result in relatively greater HAP expenditures in some areas and relatively lower HAP expenditures in other areas, with modest HAP cost savings. In all instances, MHA's payment standards will provide equal access and affordability to all submarkets to

its voucher holders / voucher-assisted households.

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

Cost effectiveness; Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households
Does this MTW activity require a hardship policy? Yes This document is attached.
Does the hardship policy apply to more than this MTW activity? No
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? No
How many hardship requests have been received associated with this activity in the past year? No hardship were requested in the most recent fiscal year.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Does the MTW activity require an impact analysis? Yes This document is attached.
Does the impact analysis apply to more than this MTW activity? No
Please explain the payment standards by ZIP code or "grouped" ZIP codes: 07940

3.b. - Alternative Reexamination Schedule for Households (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative Description: MHA may implement a triennial reexamination schedule for some elderly and disabled households. If a household meets the following three criteria, it will be enrolled in triennial reexaminations. <ul style="list-style-type: none"> • the head of household, co-head, and/or spouse is elderly or disabled, • the only current income in the household is fixed income (e.g., social security, pension), and • there are no minors in the household. If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations. For these households, the standard rent calculation method will be used, and households will continue to receive the elderly/disabled allowance and be eligible to claim unreimbursed medical/disability expenses, if certified and claimed by the household. Annual household income will be determined as current and as anticipated once every three years. If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's gross rent is above their payment standard. At their annual lease anniversary, MHA will not apply the applicable Cost-of-Living Adjustments for fixed-income households. However, as described in Activity: 1.u. – Standard Deductions (HCV), fixed-income households will also be given an opportunity to certify their medical and/or disability expenses and to qualify for the MTW standard expense deduction. If a fixed-income household claims a hardship, they may go through the process outlined in the hardship and grievance policy if applicable, by providing proof of medical/disability expenses above the MTW standard expense

deduction.

Households may continue to request interim reexaminations due to a decrease in income, and/or increases in eligible expenses through the hardship policy. Applicable households will be able to file one interim reexamination for decreases in income and/or increases in eligible expenses. MHA must allow at least one interim adjustment per year at the request of the household if the household gross income has decreased 10 percent or more.

MHA must conduct an interim reexamination of family income when it becomes aware that the family's adjusted income has changed by an amount that it estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except MHA may not consider any increase in the earned income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction at their request because of any changes in income since the last examination during the certification period; and MHA may choose not to conduct an interim reexamination in the last three months of a certification period. In other words, MHAs may not consider a family's increases in earned income for the purposes of an interim reexamination unless the family had previously undergone an interim reexamination during the year for any decrease in income. If the family has undergone an interim reexamination for a decrease in income after the completion of the last reexamination, MHA also has discretion regarding whether or not to count increases in earned income when estimating or calculating whether the family's adjusted income has increased. In determining the income for any family, MHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

In determining the income for any family, MHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

Triennial reexaminations for these households are expected to begin with reexaminations starting in January 2024. When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations. This schedule will also include only reviewing the EIV at the triennial recertification rather than annually, implementing a release form that is valid for 45 months, and updating the payment standard and utility allowance at the time of a rent increase for the affected households. In addition, households on a triennial recertification schedule will not utilize the IVT Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level

of subsidy the family receives and will increase administrative burden of PHA

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

Cost effectiveness

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation); Other – another specifically defined target population or populations.

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

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

No

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

No

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

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

1

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

Family circumstances may change throughout the period between triennial reexaminations and between applicable households' annual lease anniversaries. HUD and MHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the MHA must process interim reexaminations to reflect those changes. HUD regulations also permit the MHA to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted [HCV GB, p. 12-10]. In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition change. The MHA must complete the interim reexamination within a reasonable time after the family's request. In determining the income for any family, MHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

At their annual lease anniversary between triennial reexaminations, MHA will not apply the applicable Cost-of- Living Adjustments for fixed-income households based on the source of fixed-income, where fixed income households will also be given an opportunity to certify their medical and/or disability expenses and provide proof of changes in those amounts if applicable.

There will be no limit to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

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

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

Description:

MHA will offer vacancy loss payments to landlords in MHA's service area that re-lease a unit to a voucher holder after a previous voucher holder has vacated the unit. The payment amount will be no more than one month's contract rent of the previous tenant. The landlord must re-lease the unit to a new voucher holder within 3 months of the MHA recorded move-out date of the previous tenant and will be paid when the new HAP contract is executed between the owner and MHA.

Agency goals for MTW Activity:

The goal of this activity is to incentivize landlords to continue their participation in the HCV program and to maintain the availability of units in zip codes of opportunity. The vacancy loss payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The vacancy loss payments will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and encourage landlords to seek out additional voucher tenants rather than relying on the open market, thereby maintaining housing in zip codes of opportunity.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

No

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

Certain types of units only

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

The payment amount will be no more than one month's contract rent of the previous tenant.

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

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

\$

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

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

Description:

MHA is considering the offer of a limited damage claim not to exceed one month's contract rent to owner in cases where an MTW tenant-based voucher participant's tenancy ends and there is tenant- caused damage to the unit that exceeds the security deposit collected by the owner. The damage claim would be verified by a special inspection conducted by an MHA HQS inspector. The special inspection will be required to be conducted within 30 calendar days of the MTW tenant-based HCV participant's move-out date. The landlord must re-lease the unit to a new voucher holder within 3 months of the MHA recorded move-out date of the previous tenant and the damage claim will be paid when the new HAP contract is executed between the owner and MHA.

Agency goals for MTW Activity:

The goal of this activity is to incentivize landlords to continue their participation in the HCV program. The limited damage claim payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The limited damage claim payments will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and encourage landlords to seek out additional

voucher tenants rather than relying on the open market.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

No

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

To all units

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

MHA is considering the offer of a limited damage claim not to exceed one month's contract rent to owner in cases where an MTW tenant-based voucher participant's tenancy ends and there is tenant- caused damage to the unit that exceeds the security deposit collected by the owner.

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

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

\$

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

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

Other Landlord Incentives - Existing Landlord Incentive (HCV)

Description: MHA is considering the offer of a one-time \$500.00 incentive HAP payment to existing landlords who execute a new HAP contract for an MTW tenant-based HCV participant. An "existing landlord" would be defined as a landlord who has rented to a tenant-based voucher participant at any time within the past twelve (12) months. The landlord would not be eligible for the

\$500.00 incentive HAP payment if the contract is executed for a transfer of units with the same landlord, or if the contract is executed due to a lease renewal or change. Additionally, properties owned or managed by MHA, properties owned or managed by non-profit affordable housing entities, and properties owned or managed by any local, state or federally funded affordable housing entities, would be ineligible for this incentive HAP payment. Authority for this incentive is provided by HUD through PIH 2022-18.

Agency goals for MTW Activity: The goal of this activity is to incentivize landlords to continue their participation in the HCV program. The Existing Landlord Incentive payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The Existing Landlord Incentive `will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and encourage landlords to seek out additional voucher tenants rather than relying on the open market.

Other Landlord Incentives - New Landlord Incentive (HCV)

Description: MHA is considering the offer a one-time incentive HAP payment of \$1,000 to new landlords, upon the execution of a new HAP contract for an MTW tenant-based HCV participant. Landlords would be eligible for this payment yearly, based on a new contract with a new tenant. A "new landlord" would be defined as a landlord who has not rented to a tenant-based voucher participant within the past twelve (12) months. The landlord would not be eligible for the \$1,000 incentive HAP payment if the contract is executed for a transfer of units with the same landlord, or if the contract is executed due to a lease renewal or change. Additionally, properties owned or managed by MHA, properties owned or managed by non-profit affordable housing entities, and properties owned or managed by any local, state or federally funded affordable housing entities, would be ineligible for this incentive. Authority for this incentive is provided by HUD through PIH 2022-18.

Agency goals for MTW Activity: The goal of this activity is to incentivize landlords to continue their participation in the HCV program. The New Landlord Incentive payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The New Landlord Incentive `will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and encourage landlords to seek out additional voucher tenants rather than relying on the open market.

Other Landlord Incentives - Rent Affordability Incentive (HCV)

Description: MHA is considering the offer of a one-time rent affordability payment when rent must be negotiated down for the unit to be affordable for the MTW tenant-based voucher participant. "Affordable" would be defined as an initial rent burden of no more than 45% of the household's monthly income. The rent affordability payment would be equal to the amount the proposed monthly rent is reduced by to make it affordable and allow the voucher holder to qualify, multiplied by 12.

Agency goals for MTW Activity: The goal of this activity is to incentivize landlords to continue their participation in the HCV program. The Rent Affordability Incentive payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The Existing Landlord Incentive `will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and encourage landlords to seek out additional voucher tenants rather than relying on the open market.

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

Housing choice

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

Increased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies to all assisted households
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)
To all units
What is the maximum payment that can be made to a landlord under this policy?
The payment amount will be a one-time payment of \$500.00. (See attached MTW Supplement for full description of all three activities/waivers under 4c - Other Landlord Incentives (HCV).
How many payments were issued under this policy in the most recently completed PHA fiscal year?
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?
\$

5.a. - Pre-Qualifying Unit Inspections (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
<p>Description: MHA will allow prequalifying unit inspections (also known as a pre-inspection). Passing pre-qualifying inspections will be valid for 90 days from the passed inspection date. Participants will be able to request an interim inspection after move-in as needed.</p> <p>Agency goals for MTW Activity: The apartment industry relies on a seamless turnover to meet its overhead costs and the financial implications of such delays are sufficient to deter them from participating in the program. Property owners lose rental revenue trying to get an HQS inspection scheduled for the individual apartment units...when in fact the family is ready to move in immediately. So not only do they lose but the voucher holder loses too because they are anxious to move in and find housing.</p> <p>This activity will accelerate the lease-up process and minimize property owners' lost revenue during a period of vacancy and make the process closer to the unassisted rental market, which will incentivize their participation and/or retention in the voucher program all in service of increasing housing choice for voucher holders/households.</p> <p>The goal of these inspections is to lessen the time it takes for a voucher holder to move into a unit and encourage participation from new landlords in MHA's service area, by offering additional customer service. New landlords can understand the current HUD inspection standards through a pre-qualifying inspection, quickly make their repairs, and then be ready for a voucher holder tenant. The voucher holder will be able to move into the unit faster because they will not be waiting for an inspection, which may fail the first time and take more time to pass a re-inspection. Landlords will decrease their vacancy time and income lost. The pre-qualifying unit inspections are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. Pre-qualifying unit inspections will shorten the timeframe landlords must wait during the Request for Tenancy Approval and normal inspection process (a deterrent for some landlords) and ensure more quality units are available to voucher holders.</p>
Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

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

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

Description:

MHA will perform HQS inspections on project-based units that it owns, manages, and/or controls.

Agency goals for MTW Activity:

Streamline the HQS inspection process to match non-PHA owned HQS inspections. This waiver supports MHA's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

No

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

Following will explain the quality assurance method

An MHA supervisor will re-inspect a sample of units (10% quarterly) for quality control of HQS inspections in accordance with 24 CFR 982.405(b) and 24 CFR 985.2.

No document is attached.

5.d. - Alternative Inspection Schedule (HCV)

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

Description:

MHA will establish a local inspection schedule for all or a portion of its HCV units. MHA plans to implement an alternative schedule for conducting HQS inspections. MHA will adopt a sound policy regarding the criterion under which qualifying units can be inspected less frequently but at least once every two or three years.

Agency goals for MTW Activity:

This will help MHA increase property owner participation and create more housing choice for voucher holders.

This activity will open opportunities for a greater number of first-time and existing property owners to consider leasing under MHA's voucher program. In terms of retaining greater percentages of existing property owners participating in our voucher program, will help stabilize tenancies, reduce voucher-assisted households' costs relating to the frequency of their involuntary moves and result in administrative cost savings to MHA. Having more property owners participate in the voucher program will also lead to greater choice for voucher holders/households.

As a third-party to the HCV tenant/landlord relationship, MHA encourages property owners and voucher-assisted households to communicate directly and to adhere to their respective responsibilities to maintain decent, safe, and sanitary housing conditions in compliance with HQS. Voucher-assisted households present no greater property damage risk than unassisted tenant households. Participating property owners who receive a reasonable rent comparable with unassisted dwelling units are expected to maintain their units to the same degree and quality as non-participating property owners. To this end, after a dwelling unit has passed an initial HQS inspection (demonstrating that it is properly maintained by the property owner and that the tenant's use of the property is within normal wear and tear), the MHA will conclude that both parties can live up to their respective obligations to the same degree as property owners and tenants in the unassisted private sector. This MTW activity will support direct accountability between landlords and assisted tenants, supporting the tenant's sense of self-sufficiency and personal agency and facilitating future movement toward, and success in, the unassisted housing market.

With a measured approach, voucher participants will still be able to request an interim inspection for MHA's inspection and enforcement measures, if applicable. MHA will adopt a sound policy regarding the criterion under which qualifying units can be inspected less frequently but at least once every two or three years.

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

Cost effectiveness; Self-sufficiency; Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

No

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

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

Description:

MHA will increase the number of authorized units it project-bases.

Agency goals for MTW Activity:

The PBV program offers households fixed housing costs at a 30% affordability threshold. This allows assisted households to budget, plan and save toward future goals, all of which support self-sufficiency. Coupled with supportive services targeted to each population type and household, MHA believes that a significantly number of households will achieve increased self-sufficiency.

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

Self-sufficiency

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

No

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

50.00%

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

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

Description:

MHA may raise the Project Based Voucher cap within a project up to 100%.

Agency goals for MTW Activity:

Create family stability in an environment with support to encourage family self-sufficiency.

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

Self-sufficiency

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

No

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

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

Description:

MHA will eliminate the selection process in the award of PBV to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site.

Agency goals for MTW Activity:

Streamline the selection process for PBV. This waiver supports MHA's larger goal of using MTW flexibility to streamline administrative processes.

Safe Harbors:

9.c. i. A subsidy layering review must be conducted. *

ii. The agency must complete site selection requirements. *

iii. HQS inspections must be performed by an independent entity according to 24 CFR 983.59(b) or 24 CFR 983.103(f). *

iv. The agency is subject to Notice PIH 2013-27 where applicable, or successor.*

v. Property must be owned by a single-asset entity of the agency, see Notice PIH 2017-21. *

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

No

9.d. - Alternative PBV Selection Process (HCV)

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

Description:

The agency may establish an alternative competitive process in the award of PBVs that are owned by non-profit, for-profit housing entities, or by the agency that are not public housing.

Agency goals for MTW Activity:

MHA's goal for this request is to increase cost effectiveness by eliminating this process and increase housing choice.

Safe Harbors:

i. If the selected project is PHA-owned, HQS inspections must be performed by an independent entity according to 24 CFR 983.59(b) or 24 CFR 983.103(f). *

ii. The agency is subject to Notice PIH 2013-27 where applicable, or successor. *

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

No

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

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

Description:

MHA may lengthen the PBV HAP contract length up to 50 years.

Agency goals for MTW Activity:

This waiver supports MHA's larger goal of using MTW flexibility to both streamline administrative processes in the PBV HAP contract length terms that can be offered for cost effectiveness and to provide greater affordability in voucher-assisted households' income to housing cost burdens which directly impacts their long-term self-sufficiency.

Safe Harbors:

i. PBV HAP Contract length must not be shortened.

iii. PBV HAP Contract is subject to appropriations and the ending of an agency's MTW authorization. *

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

No

17.b. - Service Provision

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

Description:

- Vehicle repair assistance program - Vehicle repair grants of up to \$500 to help retain or gain employment or training. If the vehicle is used for transportation to work (or to find work) or school (or to apply to school), MHA will provide up to \$500 per assisted household for repairs.
- Credit Counseling - The provision of additional training and support services to enable tenants to reach self-sufficiency, will be in the form of a grant up to \$100 per eligible voucher household for financial training, credit and counseling. Credit counseling is not free. The fee to get assistance with debt is a barrier to people experiencing credit card debt. Providing \$100 to begin the credit counseling process will help households to get involved with agencies that will consolidate their debt and assist them in reducing their debt.

Agency goals for MTW Activity:

The goals of both services above are self-sufficiency and housing choice for participants.

The vehicle repair assistance program will help provide some funds towards much-needed maintenance and repair of their vehicles, thereby removing a barrier to training, education and employment.

Other financial capability and supportive programs, including financial coaching and asset building programs, offer opportunities for participants to build from their increased escrow accounts. Participants will have the ability to establish and develop a savings account, improve cash flow, create a budget plan to regulate their personal finances, rebuild their credit, strategically pay down debt and ultimately retire their debt. Working with our qualified partners and combining financial coaching with increased escrow accounts, tenants will learn to manage their financial accounts and the relationship to MHA will be strengthened.

Another type of equity that this MTW cohort will allow us to offer tenants is to have access to financial counselors and planning that people at higher incomes have access to which are needed to strengthen their and our financial futures. This will benefit their families and communities at large. Additional counseling by qualified community partners can complement these activities to also provide other asset building programs for those with student scholarship/grants for secondary and higher education, car, retirement and/or homeownership.

Safe Harbor:

- The amount of the incentive must not equal more than one month of the applicable unit's rent. *
- The agency must not spend more than 10% of its HAP budget on local, nontraditional activities.
- Families receiving housing or services through local, non-traditional activities must meet the HUD definition of low-income. *
- The agency is subject to Notice PIH 2011-45 or any successor notice and/or guidance. *

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

Self-sufficiency; Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

No

What types of services is the MTW agency providing?

Vehicle repair assistance program - Vehicle repair grants of up to \$500 to help retain or gain employment or training. If the vehicle is used for transportation to work (or to find work) or school (or to apply to school), MHA will provide up to \$500 per assisted household for repairs.

Credit Counseling - The provision of additional training and support services to enable tenants to reach self-sufficiency, will be in the form of a grant up to \$100 per eligible voucher household for financial training, credit and counseling. Credit

counseling is not free. The fee to get assistance with debt is a barrier to people experiencing credit card debt. Providing \$100 to begin the credit counseling process will help households to get involved with agencies that will consolidate their debt and assist them in reducing their debt.

How many households did the PHA provide services to in the most recently completed PHA Fiscal Year through this activity?

Does the MTW activity apply to all LNT units/properties?

The MTW activity applies to all units/properties

Are any families receiving services only (i.e., services only and no housing assistance provided by the PHA)?

No

17.c. - Housing Development Programs

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

Description:

Under this activity, MHA may utilize MTW funding to acquire, renovate and/or build affordable housing units that meet HUD requirements for MTW "local, non-traditional housing" as defined in HUD PIH Notice 2011-45 or successor notices. MHA may utilize this activity to provide gap financing (grants or loans) to affordable housing developments including, but not limited to: PBV developments, Low Income Housing Tax Credit developments and/or other eligible development activities, subject to approval by the MHA's Board of Commissioners. MHA may also use MTW funds as gap financing to support local nonprofits in the acquisition, rehabilitation, or development of properties.

MTW funds likely would be provided in the form of a loan or recoverable grant. MHA may also use MTW funds for gap financing and to support its other owned or substantially controlled developments to leverage third-party debt in the form of tax-exempt bond financing, LIHTC equity, and other local sources. MHA may expend MTW funds including Housing Assistance Payments and/or HCV Administrative Fee reserves on such activities if it shall not expend more than 10% of its Housing Assistance Payments budget on local, non-traditional activities including this housing development activity. In implementing this activity, MHA shall: 1) ensure that families assisted meet the HUD definition of "low-income"; 2) comply with PIH Notice 2011-45 as applicable; 3) comply with Section 30 of the US Housing Act of 1937; and 4) Competitively bid any MTW funding awarded through this activity to a third-party provider.

Agency goals for MTW Activity:

This activity supports the goals to increase housing choices for low-income households and to leverage additional funds for affordable housing development.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

No

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Belmont Ave Parcel	New Construction	Gap Financing	4.00	4.00	0.00	0.00	4.00	0.00

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

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

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

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

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>Yes, the Agency-Specific Waiver request is attached.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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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.
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? No	
Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.	

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.

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

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

Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

I.	Evaluations.
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No known evaluations.

**MTW Impact Analyses
Madison Housing Authority**

Activity	Activity 2.a. Payment Standards-Small Area Fair Market Rents (SAMFR) (HCV)
Fiscal Year	FY 2023
Program	Voucher Program (HCV)
1. Impact on the agency’s finances	Utilizing SAFMRs as the basis for MHA’s payment standards within the 80% to 150% range in ZIP Code 07940, in conjunction with its “rent reasonableness” system, is intended to help achieve the following goals - increase the number of families served with modest amounts of HAP reserves, while maintaining affordable income to housing cost burdens overall and ensuring good housing quality stock and providing opportunities to lease in opportunity areas. Over time, the use of SAFMR-based payment standards that are more finely attenuated to submarkets within MHA’s service area, will result in relatively greater HAP expenditures in some areas and relatively lower HAP expenditures in other areas, with modest HAP cost savings.
2. Impact on the affordability of housing costs for affected families	None
3. Impact on the agency’s waitlist(s)	Over time, this activity is intended to enable MHA to serve more eligible households from its waiting list by maximizing the use of limited Federal HAP funding efficiently and effectively, but also by helping some families to become self-sufficient from the voucher program.
4. Impact on the agency’s termination rate of families	None
5. Impact on the agency’s current utilization rate in the HCV program	None
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	This activity increases MHA’s ability to meet the statutory goals of housing choice and self-sufficiency. This activity will allow MHA to adopt and implement a reasonable policy to establish payment standards based upon applicable Small Area Fair Market Rents (SAFMRs). MHA may use this flexibility to establish payment standards for grouped ZIP code areas between 80% and 150% of the applicable SAFMRs in ZIP Code 07940, based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc., or may establish payment standards for each ZIP code within its jurisdiction.

	<p>This activity will increase the MHA’s ability to encourage self-sufficiency and increase housing choices for HCV participants by utilizing mobility counseling and Small Area Fair Market Rent (SAFMR) payment standards.</p> <p>MHA’s goal is to utilize a comprehensive approach to expand housing opportunities for HCV participants and to increase landlord participation in the HCV Program. This will be done through SAFMRs and the provision/access to information to families with neighborhood data and information to exercise their choices about where to live.</p>
<p>7. Impact on the agency’s ability to meet MTW statutory requirements</p>	<p>None</p>
<p>8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity</p>	<p>None</p>
<p>9. Impact on protected classes (and any disparate impact)</p>	<p>This activity is expected to have no disparate impact on protected classes.</p>

Madison Housing Authority's MTW Hardship Policy

Activity: 2.a. – Small Area Payment Standards –Fair Market Rents (SAFMR) (HCV)

In order to qualify for a hardship exemption, households must meet all of the criteria listed below:

1. The household is in compliance with all the program rules and regulations.
2. The household does not owe MHA any money or is current with a re-payment agreement.
3. The household must be admitted to the program prior to July 1, 2023.
4. The household has not relocated on or after July 1, 2023.
5. The household must experience an increase of 5 percent or more in rent as a direct result of the MTW rent reform initiatives.
6. The household must request the hardship waiver within 10 business days from the date of the letter notifying them of change and giving the timeline in which to request an Informal Hearing or hardship review.
7. The household has not received a rent reform hardship relief for the Payment Standards application at interim recertification previously.

Hardship relief for households who qualify and receive waiver approval may pay their portion of rent based on the calculation under HUD regulations until their next reexamination / recertification or relocation. At the next reexamination / recertification, or relocation, whichever comes first, the household will automatically be subject to the payment standards set by MHA at that time.

Each household is only eligible for one term of relief for the payment standards initiative.

Activity	Activity: 1.o. Initial Rent Burden (HCV only)
Fiscal Year	FY 2023
Program	Voucher Program (HCV)
1. Impact on the agency's finances	<p>None of MHA's voucher-assisted households with initial lease and HAP contract actions in our 50058 data from the last 18 months, have monthly adjusted income to tenant rent and tenant-paid utility allowance burdens exceeding 40 percent. As such, estimating what this activity which sets the initial income to rent burden threshold at 45 percent and has MHA write-down the difference to 40 percent at initial lease-up is \$0.</p> <p>That stated, MHA has seven voucher-assisted households who after their initial 12 months lease, went on to pay more than 40 percent of their monthly adjusted income towards rent and tenant-paid utility allowances. If this were to be used as a proxy to help identify the potential <u>maximum</u> future impact on MHA's finances if the combination of the rental housing market and MHA's future payment standards were such that instead of bearing such burden after the first 12 months, they were face bearing such burden at the time of their initial lease, then it would cost approximately \$619 per month or \$7,427.40 per year.</p>
2. Impact on the affordability of housing costs for affected families	This measure would improve affordability of housing costs for affected families.
3. Impact on the agency's waitlist(s)	None
4. Impact on the agency's termination rate of families	None
5. Impact on the agency's current utilization rate in the HCV program	This may slightly improve MHA's current utilization rate in the HCV program overall by enabling some voucher holders to lease in dwelling units and areas within our service area that they would otherwise be precluded from leasing under the non-MTW cap on initial housing cost burdens of 40 percent.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-	For the reasons stated above, this measure would further MHA's accomplishment of the following MTW statutory goals: self-sufficiency and housing choice.

sufficiency and/or housing choice	
7. Impact on the agency's ability to meet MTW statutory requirements	None
8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity	None.
9. Impact on protected classes (and any disparate impact)	This activity has no associated disparate impact on protected classes.

Madison Housing Authority's MTW Hardship Policy

Activity: 3.b. Alternative Reexamination Schedule for Households (HCV)

MHA will move to a triennial reexamination schedule for some elderly and disabled households. If a household meets the following three criteria, it will be enrolled in triennial reexaminations.

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations.

At their annual lease anniversary, MHA will not apply the applicable Cost-of-Living Adjustments for fixed-income households based on the source of fixed-income, where fixed income households will also be given an opportunity to certify their medical and/or disability expenses and provide proof of changes in those amounts if applicable.

Households may continue to request interim reexaminations due to a decrease in income and/or increases in eligible expenses.

Applicable households will be able to file one interim reexaminations for decreases in income and/or increases in eligible expenses. MHA must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10 percent or more. MHA must conduct an interim reexamination of family income when it becomes aware that the family's adjusted income has changed by an amount that it estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except MHA may not consider any increase in the earned income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction at their request because of any changes in income since the last examination during the certification period; and MHA may choose not to conduct an interim reexamination in the last three months of a certification period. In other words, MHAs may not consider a family's increases in earned income for the purposes of an interim reexamination unless the family had previously undergone an interim reexamination during the year for any decrease in income. If the family has undergone an interim reexamination for a decrease in income after the completion of the last reexamination, MHA also has discretion regarding whether or not to count increases in earned income when estimating or calculating whether the family's adjusted income has increased. In determining the income for any family, MHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship.

Triennial reexaminations for these households are expected to begin with reexaminations effective July 1, 2023. When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

This schedule will also include only reviewing the EIV at the triennial recertification rather than annually and implementing a release form that is valid for 45 months. In addition, households on a triennial recertification schedule will not utilize the Income Validation Tool (IVT) Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase administrative burden of MHA staff. Unreported income requires no change or rent correction for triennial tiered rent households unless it occurs before their last reexamination, so the IVT Report will not provide any needed information that cannot be gathered from the EIV. MHA staff will continue to monitor the EIV at households' triennial reexaminations to ensure the proper reporting of income.

Hardship Standard

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship.

Approval will be for the following reasons only:

- Decrease in income of at least \$200 a month (or \$2,400 as annualized) or more of monthly or annual income because of changed circumstances
- Increase in expenses of at least \$200 a month (or \$2,400 as annualized) for qualified households including out-of-pocket medical expenses, and/or disability related expenses
- The increase in expenses would also have to result in a reduction in the tenant rent portion to be processed
- Awaiting approval for benefit income
- Such other situations and factors as determined by the agency to be appropriate, such as eviction, or termination of utilities.

Grievance Procedure

MHA will determine whether an approved hardship exists within 30 days after the request is received.

If the request does not meet MHA hardship standards outlined above, MHA will resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.

If the request meets the hardship standards outlined above, the agency will continue to provide an exemption from the MTW activity for 12 months or until the next triennial reexamination.

If a client requests an additional hardship following the expiration of a previous hardship (or for a hardship renewal), the request will be treated as a new hardship request and undergo a new determination based on current income and information.

If a client disagrees with a hardship determination, they will follow MHA's informal hearing process outlined in the Administrative Plan.

A family may request for second level review of denied hardship requests. The family must submit a request must be in writing within 30 days the of the PHA written notice. Hardship request may be denied for the following reasons:

1. Failure to provide verification for loss or reduction of benefit income
2. Failure to provide verification for eligibility of benefit income
3. Failure to provide verification of increased expenses
4. Family is not subject to eviction, utility shut off, or wage garnishment
5. Failure to submit verification for decrease or loss of employment
6. Failure to provide supporting documentation related to loss of income due to death in the family

Exemption Period

If MHA determines that a financial or other hardship exists, the family will receive exemption from the MTW activity as stated below. The MTW activity will resume after expiration of the exemption period.

1. 210 days for loss of benefits such as, but not limited to, Social Security (SS), SS Disability, SSI, Workman's Compensation, and other income as determined in 24 CFR 5.609(b) and (c) (4)(7)(8).
2. 180 days for temporary reduction of benefits such as, but not limited to, Social Security (SS), SS Disability, SSI, Workman's Compensation, and other income as determined in 24 CFR 5.609(b) and (c) (4)(7)(8).
3. 150 days for loss of income due to death by head, spouse, or co-head
4. 90 days for increased expenses
5. 60 days for break in approval of benefit income
6. 30 days for all other circumstances

MTW Safe Harbor Waiver Request

Madison Housing Authority – NJ105

MHA requests a Safe Harbor Waiver for the following MTW activity.

1. Tenant Rent Policies

1w Alternate Income Inclusions/Exclusions (HCV). i. Agency must exempt elderly and disabled individuals from this rent determination.

Description:

MHA seeks to establish alternative policies to exclude certain forms of participant income in tenant rent calculations, which applies to all households including all elderly and disabled households.

At initial eligibility determination (or initial certification where the family is being rescreened for assistance), an applicant household's ownership of net family assets that exceed \$100,000 (as adjusted for inflation) or ownership of disqualifying real property require denial of assistance. MHA does not have the discretion to waive or alter enforcement of the HOTMA Section 102 asset limitation at admission.

However, after initial eligibility determination has been completed (or initial certification where the family is being rescreened for assistance), for voucher holders' initial lease-up, annual / biennial / triennial reexaminations (as applicable), transfer of unit, and interim recertifications, MHA will adopt a total non-enforcement policy for purposes of verifying assets, imputing or adding actual income or interest derived from assets or including it in tenant income and rent calculations. Information related to assets will be collected at initial eligibility certification (or initial certification where the family is being rescreened for assistance) for the purpose of determining that family assets complying with HOTMA Section 104 asset limits. Income from assets will not be considered as part of the income/rent calculation formula in the initial rent calculation or subsequent triennial, annual and interim recertifications, and transfer of unit, as applicable. In other words, after initial asset eligibility has been determined in accordance with HOTMA Section 104, asset information will not be requested, captured or certified by MHA or included in calculating tenant rent portion. Please note that assets also need to be considered as part of income for the purpose of determining eligibility. For example, if someone is at 75% of Area Median Income, and has significant assets then the presumed income derived from them could make them ineligible.

Madison, NJ is a high-cost community. This waiver would benefit all family types, including but not limited to elderly and disabled families and individuals.

Agency goals for MTW Activity:

Decrease administrative time and costs required to request, obtain, and follow up on tenant submission of asset documents, allowing staff to focus on other priorities.

This waiver may improve cost effectiveness in our effort to reduce the administrative burden. Staff

spend substantial amounts of administrative time verifying assets. By excluding the asset submission, certification and verification process, MHA will free up staff time to accomplish other tasks. Additionally, this waiver will decrease burdensome documentation for participants, lowering barriers to participation.

Statutes and Regulations Waived

Alternative Income Inclusions/Exclusions (HCV)—Certain provisions of sections 3(a)(1), 3(b)(4)–(5), and 8(o)(2)(A)–(C) of the 1937 Act and 24 CFR 5.609, 5.611, and 982.516.

Safe Harbors

- 1.w. i. Agency must exempt elderly and disabled individuals from this rent determination policy.

Requested Waiver and Explanation

MHA believes this safe harbor is necessary to decrease administrative time and costs required to request, obtain, and follow up on tenant submission of asset documents, allowing staff to focus on other priorities. This activity and safe harbor waiver may improve cost effectiveness in our effort to reduce the administrative burden. Staff spend substantial amounts of administrative time verifying assets. By excluding the asset submission, certification and verification process, MHA will free up staff time to accomplish other tasks. Additionally, this safe harbor waiver will decrease burdensome documentation for participants, lowering barriers to participation.

See Impact Analysis attached.

No Hardship Policy is required or applicable. MHA is extending a benefit to all households including all elderly and disabled households.

After initial eligibility determination of all households with assets exceeding \$100,000 has been completed (or initial certification where the family is being rescreened for assistance), for voucher holders' initial lease-up, annual / biennial / triennial reexaminations (as applicable), transfer of unit, and interim recertifications, MHA will adopt a total non-enforcement policy for purposes of verifying assets, imputing or adding actual income or interest derived from assets or including it in tenant income and rent calculations for all households including elderly and disabled households.

Madison, NJ is a high-cost community, where elderly and disabled households who qualify for the voucher program and subsequently have assets will not have sufficient assets to be able to afford a variety of long-term care options without MHA excluding their assets during transactions subsequent to initial eligibility. The median household income in Madison, NJ is \$152,346 (in 2021 dollars), 2017-2021, with the persons living in poverty, percent at 3.3%.

12 percent of MHA's voucher-assisted households have assets that exceed 100,000, with household incomes averaging 28 percent of Area Median Income (AMI) and ranging from 12 percent to 79 percent of AMI. 88 percent of MHA's voucher-assisted households have assets at or below \$100,000. These households' incomes average 24 percent of the Area Median Income (AMI, ranging from 2 percent to 103 percent of AMI).

The years in which they were admitted to MHA's voucher program ranging from 1994 to 2023, but they have been residing in their same dwelling units for many years. Based on this information, it is possible that 12 percent of households at initial eligibility will not be eligible for voucher housing assistance.

A copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

Activity	Impact Analysis Safe Harbor Waiver - Elimination of Assets in Income Calculation after Initial Eligibility- (HCV) Program
Fiscal Year	FY 2023
Program	Voucher Program (HCV)
1. Impact on the agency's finances	<p>The median household income in Madison, NJ is \$152,346 (in 2021 dollars), 2017-2021, with the persons living in poverty, percent at 3.3%. Madison, NJ is a high-cost community.</p> <p>12 percent of MHA's voucher-assisted households have assets that exceed 100,000, with household incomes averaging 28 percent of Area Median Income (AMI) and ranging from 12 percent to 79 percent of AMI.</p> <p>88 percent of MHA's voucher-assisted households have assets at or below \$100,000. These households' incomes average 24 percent of the Area Median Income (AMI, ranging from 2 percent to 103 percent of AMI.</p> <p>The years in which they were admitted to MHA's voucher program ranging from 1994 to 2023, but they have been residing in their same dwelling units for many years. Based on this information, it is possible that 12 percent of households at initial eligibility will not be eligible for voucher housing assistance. However, in terms of any impact on MHA's finances, beyond the initial eligibility determination, because assets will not be requested, certified or captured by MHA for its calculation of annual income for the purpose of determining the tenant rent portion, there will be no impact on MHA's finances.</p>
2. Impact on the affordability of housing costs for affected families	None
3. Impact on the agency's waitlist(s)	None
4. Impact on the agency's termination rate of families	None
5. Impact on the agency's current utilization rate in the HCV program	None
6. Impact on meeting the	For the reasons stated above, this measure would further MHA's accomplishment of the following MTW statutory goals: self-sufficiency and housing choice.

MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	
7. Impact on the agency's ability to meet MTW statutory requirements	None
8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity	None
9. Impact on protected classes (and any disparate impact)	This activity has no associated disparate impact on protected classes.

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 (04/01/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Madison Housing Authority

NJ105

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).

Jeffrey Smith

Chairperson

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

10/18/2023

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.*

Affidavit from

The Madison Eagle

STATE OF NEW JERSEY
COUNTY OF MORRIS } ss.:

Winona A. Brand, being duly sworn according to law on her oath, deposes and says that she is the accounting clerk of the MADISON EAGLE, a public newspaper which is published in the County of Morris, and that the notice of which the annexed is a copy, was published in said newspaper on:

8/31/2023

Winona Brand

Winona A. Brand

Sworn to and subscribed before me this

31 day of August 2023

Diane Howard

Diane Howard
Notary Public
New Jersey
My Commission Expires 4/23/2024

Madison Housing Authority

PUBLIC COMMENT & PUBLIC MEETING NOTICE

The Madison Housing Authority (MHA) is providing an opportunity to receive public comments on their proposed Moving to Work (MTW) Supplement, impact analysis and hardship policies for the Housing Choice Voucher Program. The deadline for comments is 4:00 PM Monday, October 16, 2023.

During the public comment period, MHA program participants and members of the general public are invited to provide written comment and to submit them via email to Executive Director Tanya Van Order at tvnorder@madisonha.com, or by mail to Madison Housing Authority, 24 Central Avenue, Madison, NJ 07940, ATTN: Executive Director.

In addition, an in-person public hearing will be held at 4:30 PM, Monday, October 16, 2023 in the Community Room of the Rexford S. Tucker Apartments, 15 Chateau Thierry Avenue, Madison, NJ 07940, which is handicapped accessible. At that time, MHA will review the MTW Supplement, answer questions and receive comments. Immediately following, MHA will present and discuss its Agency Specific Waiver under a separate agenda item with its own dedicated time slot. If translation and/or interpreter services are needed, please contact MHA at least 72 hours in advance of the meeting.

Copies of the proposed MTW supplement, Agency Specific Waiver, impact analysis and hardship policies are available prior to the hearing upon request or are available for review at the MHA's office. If you are unable to attend the hearing and want to submit written comments on the plan, please submit them prior to the meeting, to the person listed below.

For more information about the MTW supplement, Agency Specific Waiver, impact analysis, hardship policies or the hearing, contact Deputy Director Karen O'Keefe at kokeefe@madisonha.com.

MHA will consider all comments received during the public comment period and at the public hearing and may modify the MTW Supplement and related materials in response. MHA's Board of Commissioners will meet on Tuesday, October 17, 2023, in the Committee Room of the Hartley Dodge Memorial Building (50 Kings Road, Madison, NJ 07940) to take action on the MTW Supplement. The meeting is open to the public.
P.F.\$37.67

08/31/21

**MADISON HOUSING AUTHORITY
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Copies of the proposed MTW supplement, Agency Specific Waiver, impact analysis and hardship policies are available prior to the hearing upon request or are available for review at the MHA's office. If you are unable to attend the hearing and want to submit written comments on the plan, please submit them prior to the meeting, to the person listed below.

For more information about the MTW supplement, Agency Specific Waiver, impact analysis, hardship policies or the hearing, contact Deputy Director Karen O'Keeffe at kokeeffe@madisonha.com.

MHA will consider all comments received during the public comment period and at the public hearing and may modify the MTW Supplement and related materials in response. MHA's Board of Commissioners will meet on Tuesday, October 17, 2023, in the Committee Room of the Hartley Dodge Memorial Building (50 Kings Road, Madison, NJ 07940) to take action on the MTW Supplement. The meeting is open to the public.

Public Meeting October 16, 2023

Moving to Work Amendment to the Annual Plan

The meeting began at 4:30 PM in the Community Room of the Rexford Tucker Senior Apartments, 15 Chateau Thierry Avenue, Madison, NJ 07940. There were 25 people in attendance.

A 30-minute PowerPoint presentation outlining the agency's proposed MTW waivers was projected through a large television. Copies of the PowerPoint slides were provided to all in attendance. After the presentation, the public was invited to ask questions and make comments on the MTW Amendment to the Annual Plan.

Comment: It is hard to move with a housing choice voucher. Many landlords won't accept the voucher and once you mention it, the tone and responsiveness change.

Response: While New Jersey's Law Against Discrimination includes protection for Section 8 HCV participants, many landlords continue to discriminate, both in direct and indirect ways. We hope that by providing more incentives to landlords we can build relationships and create more opportunity for HCV participants in our community.

Question: Is it possible to use MTW flexible funding to help pay for HCV applicant security deposits?

Answer: Noting that this is not a proposed MTW activity, HUD notice in 2022 provides additional flexibility in using Administrative Fees to pay for security deposits. However, Administrative Fees are also needed to cover the costs associated with administering HCV programs and these fees have been prorated due to funding constraints, which makes it difficult to have sufficient surplus for use in this manner.

Question: What would be the maximum rent burden for the waiver that proposes increasing it above 40%?

Answer: We anticipate increasing this to 45%, subject to a determination that would assure that a household has sufficient income.

Question: If FMR or payment standard is different from one zip code or area to another, how does someone move to another town or state?

Answer: A tenant who wants to exercise portability will be assisted by the HCV Manager to determine the payment standard in the municipality or area where they wish to relocate. The portability paperwork will be sent to the PHA with jurisdiction in that municipality or area and that PHA will either absorb the voucher or bill MHA. Whether the payment standard is higher or lower than MHA's payment standard, MHA will continue to pay the HAP if billed.

Question: When can a voucher be made portable? Where can the voucher be moved?

Answer: After 12 months a HCV household can request portability to anywhere in the country where there is a PHA or agency that administers the HCV program

There were many questions regarding the Borough of Madison sponsored LIHTC development not directly related to MHA MTW Amendment, but mentioned as an example of how MHA uses

HCV PBV to support additional housing opportunities in the community. The questions were answered after all questions and comments related to the MTW Amendment had been addressed.

1. **Will RAD and HCV residents be eligible to apply to the new LIHTC units?** - YES
2. **Where will the development be located?** – Walnut Street & Community Place
3. **Will the development have a community space like our senior building?** – NO
4. **Will there be laundry facilities?** – YES, washer/dryer in each unit
5. **Will there be a preference for Madison residents?** – NO
6. **How many units and how many buildings in total?** – 44 units in 6 buildings
7. **When will they be built?** – Anticipated groundbreaking is by end of October
8. **Will MHA notify its residents when applications are open?** – YES

The MTW Amendment to the Annual Plan portion of the public meeting ended at 5:20.

Questions & Comments
Public Meeting October 16, 2023
Agency Specific Waiver – Elimination of Assets in Income Calculation

A separate meeting to discuss the Agency Specific Waiver “Elimination of Assets in Income Calculation” began at 5:20 in the Community Room of the Rexford Tucker Senior Apartments, 15 Chateau Thierry Avenue, Madison, NJ 07940. There were 25 people in attendance.

A 5-minute PowerPoint presentation outlining the agency’s proposed Agency Specific Waiver was projected through a large television. Copies of the PowerPoint slides were provided to all in attendance. After the presentation, the public was invited to ask questions and make comments on the Agency Specific Waiver “Elimination of Assets in Income Calculation”.

Question: What asset documents will still be required?

Answer: If HUD approves our waiver, we will not collect asset documents after initial eligibility has been determined.

Question: What does HUD consider an asset?

Answer: HUD has an extensive list of assets, which generally includes all accounts and investments with liquidity, as well as market value of real property. For the purpose of determining if a household qualifies under new asset limits, there are also assets that are not included, such as IRA accounts. Full details of HUD asset definitions and asset exclusions under new HUD regulations imposing an asset limit are available upon request.

Question: When do HUD asset limits go into effect?

Answer: PHAs have until 1/1/2025 to begin implementing HOTMA Section 104, the Asset Limit rule. Our PHA anticipates beginning implementation 1/1/2025, which will amend its Administrative Plan sooner. Further guidance from HUD is expected and needed on Section 104.

Question: How will MHA communicate this new asset limit requirement to residents?

Answer: Once HUD has provided additional needed guidance, we will promptly communicate to all residents impacted by HOTMA Section 104.

Question: When will this waiver take effect?

Answer: HUD must review and approve this and all other requested MTW waivers. It is our hope that they will do this promptly, however other MTW expansion agencies have reported long delays in HUD response time. If HUD does not approve our Agency Specific Waiver, or if HUD does not approve it in time for us to make all the necessary changes to our Administrative Plan by 1/1/2025, we will communicate this to residents.

Comment/Question: Madison has much higher cost of living than other parts of the country and the asset limit should reflect that. Why didn’t HUD take this in consideration when they made this rule? They have different income limits and also different payment standards? Why did they not do the same for the asset limit?

Answer: We have posed this same question to our affordable housing industry partners (NAHRO, PHADA) and we are waiting to hear back from HUD for further guidance.

Comment/Question: There was not an asset limit when current tenants moved in. It doesn't seem fair to change the rules and make elderly people move from a community they value. Why doesn't HUD make the asset limit effective to new families only?

Answer: We have posed this same question to our affordable housing industry partners (NAHRO, PHADA) and we are waiting to hear back from HUD for further guidance.

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