

PHA Name : Medina Metropolitan Housing Authority

PHA Code : OH027

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2023

PHA Program Type: Housing Choice Voucher (HCV) only

MTW Cohort Number: Asset Building

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Through our participation in this MTW cohort, Medina Metropolitan Housing Authority (MMHA) plans to help set participants up for their positive financial ability and decisions for their futures. As described below, the Medina Metropolitan Housing Authority's overall vision for its Moving to Work (MTW) program focuses on the three statutory aims of the MTW Demonstration Program – cost effectiveness, self-sufficiency, and housing choice. We make mention below of our intent to make available to a segment of our voucher-assisted families asset building programs. These asset building programs, including access to banking, building of emergency savings, and financial coaching, will be implemented as part of a significant amendment later this fiscal year through specific Cohort Specific Waivers.

Self-Sufficiency: MMHA wants to support voucher-assisted tenants in enhancing their families' ability to meet their rent and utility payments but also to invest in their educational and employment needs with an eye towards stability and self-sufficiency. We want tenants to have the chance to be integrated into both private sector financial systems and non-profit credit repair and financial literacy services. Asset building and more cost-effective access to credit will help low-income families have a better financial buffer from unanticipated and expected expenses in their lives as well as to invest in their education, employment, health, training, transportation, etc.

Research has shown that financial coaching and asset building programs have had positive impacts on individuals' credit reports and scores. Some individuals moved into a lower credit score risk tier such that they became eligible for credit, often at cheaper rates. Those with the lowest scores had the most to gain in the improvement of their credit scores. Although increased incomes may not be the explicit or initial goal of these interventions and more robust study is needed, it is our hope that participants' average annual incomes will also increase over time.

Housing Choice: MMHA wants to help voucher-assisted tenants increase their housing choices, by virtue of helping them set up and increase their escrow accounts and assets as well as to set up and have good credit. We also see the range of interventions and activities in our proposal, as an effective approach for eviction prevention, housing stability and financial stability, because when households are engaged in costly financial services and instruments instead of the other sound measures and vehicles, they often find they do not have the money needed to pay their rent and/or utilities, water/sewer, and trash pick-up. Eviction records also have a substantial adverse impact on tenants' future housing choices.

Cost Effectiveness: Through increased escrow accounts and savings, MMHA 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, insufficient savings and credit or improved credit. Our participation in this MTW cohort to set up and improve households' credit will also help improve families' successful leasing rates. If there are family circumstances that lead to reductions in hours worked or decreased income, without asset development and access to cost effective credit if needed, there could be an associated increase in potential late rent and/or utility payments, eviction, informal reviews, and hearings, etc. that we hope to reduce through the interventions described in our application.

MMHA also wants to further improve our partnership with our voucher-assisted tenants and local community organizations and institutions. We are interested in using our strengths, resources, and partnerships to ensure that we continue meeting the needs of the families we serve.

MMHA has a good history of managing our voucher programs with the available HAP from HUD each year. In the especially challenging years 2020 through the present due to COVID-19 and rapidly rising rental markets, the higher of our voucher lease-up and/or HAP budget utilization rate is conservatively estimated as an annual average for 2022 at 96.8 percent.

However, there are several challenges serving low-income tenants in our communities including a range of impacts on rental housing markets and utility cost inflation stemming in part although not entirely from COVID-19. The comparable private rental housing market data the Medina County shows that rents in April 2022 vs. April 2021 were 11 percent greater, which has been the case since September 2021.

Currently, MMHA does not have all the property owner partners that we could. Incentivizing property owners to take part in our voucher program through the MTW waivers and MMHA's activities described below will help us increase property owner participation and create more housing choice and affordability for voucher holders.

Perhaps compared to other parts of the country, there are a considerable number of single-family homes in Medina County's housing stock. Under the right set of conditions and actions, including utilizing the broader range of SAFMR-based payment standards as well utilizing the escrow account, asset development and rent and credit reporting interventions and partnering with other qualified partners as described in MMHA's proposal, we believe that we have unique challenges and opportunities to help provide accessibility and affordability for rent, lease to purchase and homeownership opportunities to greater numbers of our participants.

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

With high demand for affordable housing here in Medina County, it is important for MMHA to serve unassisted households to our full ability. Our existing practices will be enhanced with MMHA's future implementation of MTW flexibility activities, alternative reexamination schedule for households, and SAFMR-based payment standards with MTW flexibility, we believe that participation in HUD's MTW expansion will enable more households to become self-sufficient. By doing so, we will also be able to serve more unassisted households each year.

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, will enable MMHA to address the missing pieces and enable us to provide a more comprehensive approach to administering our voucher program. In doing so, we believe that we will be able to achieve a higher voucher lease-up rate all the way to 100 percent. If we can conduct this important goal with the benefit of being selected for HUD's Asset Building Cohort and MTW expansion authority, MMHA sees this as an opportunity for us to be awarded more vouchers in the future, so that we can better reach eligible unassisted applicant households.

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
u. Standard Deductions (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
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
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
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Plan to Implement in the Submission Year
f. Increase PBV HAP Contract Length (HCV)	Plan to Implement in the Submission Year
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	
a. Waive Initial HQS Inspection Requirement (HCV)	Plan to Implement in the Submission Year
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
c. Housing Development Programs	Plan to Implement in the Submission Year

C. MTW Activities Plan that Medina Metropolitan 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:
MMHA may waive the maximum family share at initial occupancy of 40% of the family's monthly income, but not to exceed 50% of their monthly income.
Agency goals for MTW Activity:

MMHA'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?

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

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?

50.00%

1.u. - Standard Deductions (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:

For the following households, MMHA proposes replacing the expense deductions in Activity: 1.s. Elimination of Deduction(s) described above with the following standard expense deductions:

- 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.

In determining adjusted income, for elderly/disabled households, MMHA must deduct \$700 from annual gross income of record. This single deduction accounts for both medical/disability expenses as well as the former elderly/disabled household allowance. The \$700 elderly/disabled household deduction will be tied to inflation and applied at triennial reexamination effective dates for each fixed-income household when the inflation adjusted elderly/disabled household deduction reaches an increase of \$25, that increased increment will be added to the deduction and applied to their gross income.

This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus.

To the extent a household's medical/disability expenses (defined below) exceed \$2,000, they may file a hardship.

Medical / Disability Expenses: (i) Unreimbursed medical expenses of any elderly family or disabled family; and (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed.

Agency goals for MTW Activity:

MMHA's goal with this activity for all parties involved, is a simpler method to calculate tenant rent and to eliminate original and third-party documentation for two out of the three years of triennial reexaminations.

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.

Neutral (no cost implications); 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)

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

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

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

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
How much will the single standard deduction be in the Fiscal Year? \$700

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 MMHA to adopt and implement a reasonable policy to establish payment standards based upon applicable Small Area Fair Market Rents (SAFMRs). MMHA may use this flexibility to establish payment standards for grouped ZIP code areas between 80% and 150% of the applicable SAFMRs, 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: MMHA'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 MMHA 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 MMHA's payment standards within the 80% to 150% range, 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 MMHA'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, MMHA's payment standards will provide equal access and affordability to all submarkets to its voucher holders / voucher-assisted households. Ultimately, the MMHA will provide HCV participants with information about housing opportunity areas and bargains. 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. Through the measures above, MMHA plans to increase housing choice and opportunities and deconcentrating poverty for HCV participants in neighborhoods that have access to jobs, good schools, healthcare, a healthy environment, healthy foods, safe neighborhoods, and transportation services.
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 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:

Grouped ZIP codes based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc.,

Through this activity, MMHA plans to increase housing choice and opportunities and deconcentrating poverty for HCV participants in neighborhoods that have access to jobs, good schools, healthcare, a healthy environment, healthy foods, safe neighborhoods, and transportation services.

Among the geographic considerations is grouping ZIP codes within SAFMRs.

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:

MMHA 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.

- 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, MMHA 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 deducti. 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. MMHA 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. MMHA 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 MMHA 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 MMHA may choose not to conduct an interim reexamination in the last three months of a certification period. In other words, MMHAs 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, MMHA 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, MMHA 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, MMHA 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 reexamination processing begin 7/1/2023. 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, 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

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)

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

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

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

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 MMHA policies dictate what kinds of information about changes in

family circumstances must be reported, and under what circumstances the MMHA must process interim reexaminations to reflect those changes. HUD regulations also permit the MMHA 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 MMHA must complete the interim reexamination within a reasonable time after the family's request. In determining the income for any family, MMHA 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, MMHA 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 a limit of one 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.

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

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

Description:

MMHA will allow participants and applicants (through a safe harbor waiver) to self-certify their assets up to \$50,000.

Agency goals for MTW Activity:

Decrease administrative time and costs required to follow up and secure documents, allowing staff to focus on other priorities. This may also lower barriers to participants in obtaining asset verification.

This waiver may improve cost effectiveness in our effort to reduce the administrative burden while still maintaining the integrity of the rent calculation process. Staff spend substantial amounts of administrative time verifying assets that do not impact participants' rent portions. Participants know the approximate balances in their accounts and rarely receive interest payments. By allowing them to self-certify, MMHA will free up staff time to accomplish other tasks and require less

burdensome documentation of participants.

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

\$50,000.

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

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

Description:

MMHA will offer vacancy loss payments to landlords in MMHA'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 MMHA recorded move-out date of the previous tenant and will be paid when the new HAP contract is executed between the owner and MMHA.

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?

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.

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:

MMHA 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 MMHA 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 MMHA recorded move-out date of the previous tenant and will be paid when the new HAP contract is executed between the owner and MMHA.

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?

MMHA 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

Description:

MMHA is considering the offer a one-time incentive HAP payment of \$1,000.00 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 \$1,000.00 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 MMHA 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.

Description:

MMHA 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 MMHA would be ineligible for this incentive HAP payment.

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.

Description:

MMHA 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 50% 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?

\$1,000 for first "Other Landlord Incentive"

\$500 for second "Other Landlord Incentive"

Third "Other Landlord Incentive" - 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.

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

Description:

Medina Metropolitan Housing Authority 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.

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.

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.

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 MMHA'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.

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.

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:

Medina Metropolitan Housing Authority will increase the number of authorized units it project-bases.

Agency goals for MTW Activity:

Sometimes, people do not necessarily associate affordable housing at 30% of low-income households' monthly adjusted income in both tenant-based voucher and project-based assistance programs as directly relating to self-sufficiency. However, the PBV program offers households housing costs at a 30% affordability threshold. With the right type of wrap around services pertinent to each population type and household, coupled with this activity and safe harbor waiver, MMHA believes that significantly greater numbers of households will be able to become self-sufficient.

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:

Medina Metropolitan Housing Authority 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:

Medina Metropolitan Housing Authority 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 Medina Metropolitan Housing Authority's larger goal of using MTW flexibility to streamline administrative processes.

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 selection 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. This selection process includes proposals with or without competitive selection requirements. MMHA will use the following selection criteria via a ranking system as follows.

- The housing must promote one of MMHA's priorities for its PBV program; (15 maximum points earnable)
- The proposal must comply with all HUD program regulations and requirements; (10 maximum points earnable)
- The property must be eligible housing in accordance with 24 CFR 983.53 and 983.54. MMHA is also approved to serve shared housing and manufactured housing per approved MTW waiver. (5 maximum points earnable)
- The proposal must comply with the HUD cap on PBV units per building at 24 CFR 983.56; MMHA is approved to raise the cap to 100% per building per approved MTW waiver. (5 maximum points earnable)
- The housing site must meet the site selection standards detailed at 24 CFR 983.57; (5 maximum points earnable)
- Proposals for new construction or rehabilitation projects must demonstrate capacity, experience, and successful outcomes in prior projects that indicate their ability to complete the construction work effectively and within the proposed schedule; (10 maximum points earnable)
- Proposals for all housing must demonstrate capacity, experience, and successful outcomes in property management, particularly management of housing targeted to low-income persons and families; (15 maximum points earnable)
- Proposals for supportive housing must demonstrate the capacity, experience, and successful outcomes of the supportive services provider that indicate its ability to effectively provide sufficient supportive services. More detailed information about minimum supportive services guidelines is provided later in this addendum. (15 maximum points earnable)
- Proposals must provide evidence of sufficient financing commitments (for construction, operations, and supportive services if applicable) to demonstrate the project's long-term viability. (15 maximum points earnable)
- The owner is good standing with HUD and MMHA. (5 maximum points earnable)

MMHA will follow its HCV administration plan to award PBV contracts accordingly.

Agency goals for MTW Activity:

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

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

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

Description:

MMHA may attach and add PBV assistance to shared housing and/or manufactured housing. PBV units must comply with HQS. PBV units must comply deconcentration and desegregation requirements under 24 CFR part 903. A subsidy layering review must be conducted and if MMHA allows shared housing, the units may not be owner occupied.

Agency goals for MTW Activity:

The goal is to increase housing choice options for families.

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

0

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

0

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

0

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

0

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

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

Description:

Medina Metropolitan Housing Authority may lengthen the PBV HAP contract length up to 50 years.

Agency goals for MTW Activity:

This waiver supports Medina Metropolitan Housing Authority'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.

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

14.a. - Waive Initial HQS Inspection 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:

For participants who will continue leasing the same unit, the agency is authorized to accept the most recent HQS inspection from the partner agency in place of an initial HQS inspection. In instances when low-income households participating in the Shelter Plus Care (PSH) program who are able and want to move on from into MMHA's HCV program while continuing to live in the same dwelling unit that previously passed our partner agency's housing inspection, will have that passed inspection honored by MMHA in lieu of our performing an HQS inspection.

Agency goals for MTW Activity:

This waiver supports Medina Metropolitan Housing Authority's larger goal of using MTW flexibility to increase voucher-assisted households' self-sufficiency, housing choice and program cost effectiveness.

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 only to a subset or subsets of assisted households

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

New admissions (i.e., applicants) only

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

The MTW activity applies to the subset of assisted households in the Shelter Plus Care (PSH) who are able and want to move on from into MMHA's HCV program.

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

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

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

The MTW activity applies to the subset of assisted households in the Shelter Plus Care (PSH) who are able and want to move on from into MMHA's HCV program.

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

No

17.c. - Housing Development Programs

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

Description:

Under this activity, MMHA 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. MMHA 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 MMHA's Board of Commissioners. MMHA may also use MTW funds as gap financing to support local nonprofits in the acquisition, rehabilitation, or development of small- to medium-sized properties in Medina County. MTW funds likely would be provided in the form of a loan or recoverable grant. MMHA 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. MMHA 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, MMHA 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
The Lafayette	New Construction	Gap Financing	10.00	0.00	0.00	0.00	0.00	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 is(are) attached.</p>

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

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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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	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	Total Local, Non-Traditional Households	0

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

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

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

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

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

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

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

I.	Evaluations.
	No known evaluations.

Hardship Policy - 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 MMHA 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 MMHA at that time.

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

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

MMHA 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, MMHA 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. MMHA 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. MMHA 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 MMHA 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 MMHA may choose not to conduct an interim reexamination in the last three months of a certification period. In other words, MMHAs 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, MMHA 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, MMHA 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 MMHA 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. MMHA 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
- The decrease in income would also have to result in a reduction in the tenant rent portion to be processed
- 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

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

If the request does not meet MMHA hardship standards outlined above, MMHA 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 MMHA'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 MMHA 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

Hardship Policy: 1.u. Standard Deductions (HCV)

Households must apply for all hardship types with the exception of automatic hardships given at the time of the triennial recertification. Hardships may last less than the timeframe listed below if a hardship time period overlaps with a triennial recertification. Approval will be for the following reasons only.

Automatic Hardships:

These hardships may be granted at the time of the triennial recertification for the following reasons.

1. A qualifying household's current gross income is at or exceeds an amount that is 10 percent less than their retrospective (prior actual 12-months) income.
2. MMHA will allow a single deduction to those elderly/disabled households who successfully claim a hardship or grievance. Medical and disability expenses totaling more than \$2,000 used for TTP purposes for each elderly/disabled household that demonstrates, certifies and provides documentation of medical appointments, insurance premiums, prescriptions, and other medical bills that are out-of-pocket expenses not covered by their insurance. In other words, if an elderly/disabled household claims and qualifies for a medical and disability expense deduction and provides any/all of the documentation in the categories below that exceeds \$2,000 of a qualifying household's gross annual income, MMHA will provide the full amount of their **actual** medical and disability expense deduction as documented. Eligible expenses include:
 - (i) Unreimbursed medical expenses of any elderly family or disabled family; and
 - (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and

Other Hardships:

- 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.

Other circumstances: A household may request a hardship exemption for other circumstances not outlined in this policy, such as the death of a family member that impacts the family's finances. MMHA will consider these requests and appropriate remedies on a case-by-case basis and decisions will be made by a staff member at the supervisor level or higher.

Long Term Hardship:

1. Death of a household member.

Requesting A Hardship:

To request a hardship, the participant/resident must complete a Hardship Request form and attach the household's current income and proof of hardship. The form will be made available in an accessible format upon request as a reasonable accommodation. Current proof of all income for all current household members will be required. The request will be reviewed and the household notified of the approval or denial in a timely manner.

MMHA will determine whether an approved hardship exists within 30 days after the request is received. Hardship requests may be denied for the following reasons:

- Failure to provide verification for loss or reduction of benefit income
- Failure to provide verification for eligibility of benefit income
- Failure to provide verification of increased expenses
- Family is not subject to eviction, utility shut off, or wage garnishment
- Failure to provide supporting documentation related to loss of income due to death in the family

The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request does not meet the above criteria. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify. Prior to the expiration of the hardship, the household will be notified of their rent portion set at their last triennial recertification or new admission. Households may request a renewal of their hardship. The request will be treated as a new hardship request and undergo a new determination with current income.

If a household is approved for a hardship, and subsequently experiences another adverse event while still in hardship status, they may request an additional hardship. The request will be treated as a new hardship request and undergo a new determination with current income. There is no limit on the number of hardships that a household may receive. If a household is approved for a hardship, they are not required to report subsequent income increases during the period of their approved hardship.

Grievance Procedure:

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

A family may request for second level review of denied hardship requests, which will be conducted by a staff member at the supervisor level or higher. The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their hardship request.

If the request does not meet MMHA hardship standards outlined above, MMHA will resume the MTW activity. If the request meets the hardship standards outlined above, the agency will continue to provide an exemption from the MTW activity until the next 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.

Exemption Period:

If MMHA 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.

- 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).
- 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).
- 150 days for loss of income due to death by head, spouse, or co-head
- 90 days for increased expenses
- 60 days for break in approval of benefit income
- 30 days for all other circumstances

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

Households must apply for all hardship types with the exception of automatic hardships given at the time of the triennial recertification. Hardships may last less than the timeframe listed below if a hardship time period overlaps with a triennial recertification. Approval will be for the following reasons only.

Automatic Hardships:

These hardships may be granted at the time of the triennial recertification for the following reasons.

1. A qualifying household's current gross income is at or exceeds an amount that is 10 percent less than their retrospective (prior actual 12-months) income.
2. MMHA will provide medical and disability expense deductions to those households who successfully claim a hardship or grievance. Medical and disability expenses total more than the dollar equivalent of 15 percent of a qualifying household's gross annual income used for TTP purposes for each elderly/disabled household that demonstrates and certifies that their medical expenses exceed at least three percent of their gross income and have previously provided (or provide in the first year that this medical expense deduction is allowed), documentation of medical appointments, insurance premiums, prescriptions, and other medical bills that are out-of-pocket expenses not covered by their insurance. In other words, if an elderly/disabled household claims and qualifies for a medical and disability expense deduction and provides any/all of the documentation in the categories below that exceeds 3 percent of a qualifying household's gross annual income, MMHA will provide the full amount of their **actual** medical and disability expense deduction as documented minus three percent of their gross annual income. Eligible expenses include:
 - (i) Unreimbursed medical expenses of any elderly family or disabled family; and
 - (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and

Other Hardships:

- 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.

Other circumstances: A household may request a hardship exemption for other circumstances not

outlined in this policy, such as the death of a family member that impacts the family's finances. MMHA will consider these requests and appropriate remedies on a case-by-case basis and decisions will be made by a staff member at the supervisor level or higher.

Long Term Hardship:

1. Death of a household member.

Requesting A Hardship:

To request a hardship, the participant/resident must complete a Hardship Request form and attach the household's current income and proof of hardship. The form will be made available in an accessible format upon request as a reasonable accommodation. Current proof of all income for all current household members will be required. The request will be reviewed and the household notified of the approval or denial in a timely manner.

MMHA will determine whether an approved hardship exists within 30 days after the request is received. Hardship requests may be denied for the following reasons:

- Failure to provide verification for loss or reduction of benefit income
- Failure to provide verification for eligibility of benefit income
- Failure to provide verification of increased expenses
- Family is not subject to eviction, utility shut off, or wage garnishment
- Failure to provide supporting documentation related to loss of income due to death in the family

The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request does not meet the above criteria. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify. Prior to the expiration of the hardship, the household will be notified of their rent portion set at their last triennial recertification or new admission. Households may request a renewal of their hardship. The request will be treated as a new hardship request and undergo a new determination with current income.

If a household is approved for a hardship, and subsequently experiences another adverse event while still in hardship status, they may request an additional hardship. The request will be treated as a new hardship request and undergo a new determination with current income. There is no limit on the number of hardships that a household may receive. If a household is approved for a hardship, they are not required to report subsequent income increases during the period of their approved hardship.

Grievance Procedure:

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

A family may request for second level review of denied hardship requests, which will be conducted by a staff member at the supervisor level or higher. The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their hardship request.

If the request does not meet MMHA hardship standards outlined above, MMHA will resume the MTW activity. If the request meets the hardship standards outlined above, the agency will continue to provide an exemption from the MTW activity until the next 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.

Exemption Period:

If MMHA 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.

- 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).
- 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).
- 150 days for loss of income due to death by head, spouse, or co-head
- 90 days for increased expenses
- 60 days for break in approval of benefit income
- 30 days for all other circumstances

Activity	Activity: 1.u. - Standard Deductions (HCV)
Fiscal Year	FY 2023
Program	Voucher Program (HCV)
1. Impact on the agency's finances	<p>This activity is expected to reduce administrative costs and to be budget and revenue neutral in Housing Assistance Payments.</p> <p>In 2022, across all programs (regular vouchers plus special purpose vouchers) and household types, MMHA had 1,346 household transactions of which 45 percent were annual reexaminations, and 47 percent were interim recertifications.</p> <p>MMHA proposes the following single standard deduction to be replaced under Activity: 1.u. - Standard Deductions in each of the same types of expense deductions as described.</p> <p>In 2022, approximately 75.2 percent of voucher families leased meet the definition of applicable households for triennial reexaminations:</p> <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. <p>The single standard deduction of \$700 is for the elderly/disabled households (defined above). If however, all applicable households with medical/disability expenses exceeding \$2,000 request a hardship and receive it, the anticipated HAP expense would be approximately \$ \$120,768 per year.</p>
2. Impact on the affordability of housing costs for affected families	None. The 6.4 percent of households that had medical and disability expense deductions over the replacement value, would be able to file hardship and have their documented expenses counted towards their medical and disability expense deductions.
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 MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	This activity increases MMHA's ability to meet the statutory goals of cost effectiveness, through a simpler method to calculate tenant rent and to eliminate original and third-party documentation for medical and disability expense deductions two out of the three years of triennial

	reexaminations.
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	This is the initial year of implementation. The MMHA expects a hardship rate up to 6.4%.
9. Impact on protected classes (and any disparate impact)	This activity is expected to have no disparate impact on protected classes.

Activity	Impact Analysis - 2.a. Payment Standards – Small Area Fair Market Rent (HCV)
Fiscal Year	FY 2023
Program	Voucher Program (HCV)
1. Impact on the agency’s finances	In order for MMHA 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 MMHA’s payment standards within the 80% to 150% range, 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 MMHA’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, MMHA’s payment standards will provide equal access and affordability to all submarkets to its voucher holders / voucher-assisted households.
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 MMHA 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	<p>This activity increases MMHA’s ability to meet the statutory goals of housing choice and self-sufficiency. This activity will allow MMHA to adopt and implement a reasonable policy to establish payment standards based upon applicable Small Area Fair Market Rents. MMHA may use this flexibility to establish payment standards for grouped ZIP code areas between 80% and 150% of the applicable SAFMRs, 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 in grouping SAFMRs, MMHA may explore the use of school districts.</p> <p>This activity will increase the MMHA’s ability to encourage self-sufficiency and increase housing choices for HCV participants by utilizing mobility counseling SAFMR payment standards.</p> <p>MMHA’s goal is to utilize a comprehensive approach to expand housing opportunities for HCV participants and to</p>

	<p>increase landlord participation in the HCV Program. Ultimately, the MMHA will provide HCV participants with information about housing opportunity areas and bargains. 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. MMHA will increase housing choices for HCV participants to live in areas of opportunity based on Payment Standards between 80% and 150% of the SAFMRs. Through the measures above, MMHA plans to increase housing choice and opportunities and deconcentrating poverty for HCV participants in neighborhoods that have access to jobs, good schools, healthcare, a healthy environment, healthy foods, safe neighborhoods, and transportation services.</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>

Activity	Impact Analysis - 3.b. Alternative Reexamination Schedule for Households (HCV)
Fiscal Year	FY 2023
Program	Voucher Program (HCV)
<p>1. Impact on the agency's finances</p>	<p>This activity is expected to reduce administrative costs and to be budget and revenue neutral in Housing Assistance Payments. By going to triennial reexaminations for elderly and disabled households with fixed-incomes, MMHA estimates that over a three-year period, annual reexaminations will be reduced as follows.</p> <p>In 2022, approximately 75.2 percent of voucher families leased meet the definition of applicable households for triennial reexaminations:</p> <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. <p>HUD's "Housing Choice Voucher Program Administrative Fee Study" (August 2015) found that the average time PHAs spent on annual recertifications was 3.0 hours per voucher per year for elderly households and 2.4 hours per voucher per year for non-elderly disabled households.</p> <p>Annual recertifications include preparing for and scheduling recertification, conducting interviews, verifying income and household composition, reviewing Enterprise Income Verification (EIV), and calculating total tenant payment and housing assistance payment. Based on this study, and the scope of MMHA's proposed activity/waiver, we anticipate significant administrative cost efficiencies.</p> <p>Triennial reexaminations for the elderly and disabled households with fixed-incomes who qualify, where MMHA will not apply Cost of Living Adjustments from applicable sources of fixed-income on their lease anniversary between triennial reexaminations will result in our agency forgoing that income in their Total Tenant Payment calculations, and there will be increased HAP expenditures as follows.</p> <p>Combining both years and averaging them together, the increased tenant rent contribution under the existing non-</p>

	<p>MTW income and rent method was \$73,598 per year. It is estimated to increase HAP expenditures by \$147,196 over the two-year period, when MMHA does not make any COLA adjustments at the annual lease anniversary during years 2 and 3 of the triennial reexamination period.</p> <p>Households on fixed incomes through Social Security received an 8 percent Cost of Living Adjustment due to inflationary costs, and in 2021 the COLA was 1 percent.</p> <p>Because of HUD's unique HAP renewal funding inflation factor in FY 2023 which is greater than MMHA's slowing growth rate in rent increases in 2022, MMHA has a significant amount of HAP and HAP Reserves with which to work in 2023 that will be applied to this activity.</p>
<p>2. Impact on the affordability of housing costs for affected families</p>	<p>None. Qualifying elderly and disabled will be allowed to retain more of their annual COLAs without those increased funds being taxed/counted in their Total Tenant Payment two out of the three years.</p>
<p>3. Impact on the agency's waitlist(s)</p>	<p>None</p>
<p>4. Impact on the agency's termination rate of families</p>	<p>None</p>
<p>5. Impact on the agency's current utilization rate in the HCV program</p>	<p>None</p>
<p>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice</p>	<p>This activity will increase MMHA's ability to meet the statutory goals of cost-effectiveness.</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>This is the initial year of implementation. The MMHA expects a hardship rate up to 0%.</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>

Public Comment

An RAB Meeting was held on 1/20/2023 at the MMHA offices at 850 Walter Road Medina Ohio. 3 RAB Members were in attendance; Samuel Roten, Doug McClure and Mona Smith as well as Gary Blake Deputy Director, Kelly Parker Program Manager and Piper Morgan program director. The RAB members had a positive response to the all of the proposed waivers, in particular the landlord incentives. Members expressed need for more housing choice for voucher holder within the county and felt that the both the financial incentives for new and existing landlords as well and the damage claims options will benefit both clients and landlords and provide increase housing opportunities in the community. RAB members also felt that families chosen for the future asset building activities should be required to complete some form of financial coaching in order to receive the money. The overall sentiment to the changes was positive.

An RAB meeting was held on 2/24/2023 at the MMHA offices at 850 Walter Road Medina Ohio. In attendance were RAB members; Mona Smith, Doug McClure, Samuel Roten, Jamie Charleton, Cindy Maxim and Stephanie Morris as well as Gary Blake Deputy Director and Piper Morgan Program Manager. RAB members were again across the board pleased with all the proposed waivers. Landlord incentives continue to be the top priorities for voucher holders in the hopes that it provides more housing choices. RAB members also appreciated the standard deduction and tri-annual recertifications. They felt very strongly about the stress it would relieve for them of having to complete the paperwork.

A Public Hearing was held on 3/20/2023 at the MMHA offices at 850 Walter Road Medina Ohio for review of the MTW Supplement, this was immediately followed by a second public hearing for the requested Safe Harbor Waiver. In attendance was from the public was Mona Smith. Also in attendance was Gary Blake, Deputy Director and Piper Morgan Program Manager. A final draft supplement was presented. Ms. Smith reiterated the same positive comments from previous RAB meetings she had attended. Landlord incentives being the most important, followed by the standard deductions and tri-annual recertifications. She indicated that she looks forward to seeing the implementation of these changes and is open to any further discussions in the future.

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

Resolution #23-06
Medina Metropolitan Housing Authority
PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or x Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 7/1/2023, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan 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 (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan 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 Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency 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), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:

- The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the 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.
 11. The 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.
 12. The 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.
 13. The 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.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. With respect to public housing the 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.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Medina Metropolitan Housing Authority
PHA Name

OH-027
PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2024

5-Year PHA Plan for Fiscal Years 20____ - 20____

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).

Executive Director: James A. Sipos

Name: Board Chairman Scott Miller

Signature DocuSigned by:
James A. Sipos Date 3/29/23

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Signature DocuSigned by:
Scott Miller Date 3/29/23

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U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Public Housing

Cleveland Office, Region V – Upper Midwest Region

1001 Lakeside, Suite 350

Cleveland, OH 44114

Phone (216) 357-7900 FAX (216) 357-7916

clevelandpublichousing@hud.gov

July 3, 2023

Mr. James A. Sipos
Executive Director
Medina Metropolitan Housing Authority
860 Walter Road
Medina, Ohio 44256-1542

SUBJECT: Medina Metropolitan Housing Authority 2023 Annual PHA Plan/MTW Supplement

Dear Mr. Sipos:

This letter is to inform you that the Medina Metropolitan Housing Authority's (MMHA) Annual PHA Plan and Moving to Work (MTW) Supplement for the Fiscal Year beginning July 1, 2023, is approved.

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

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

By signing the PHA Certifications of Compliance with PHA Plans and Related Regulations, MMHA is certifying it complies with the requirements of Section 3 as it applies to Public Housing programs that receive: 1) developmental assistance; 2) operating assistance; or 3) modernization grants.

Also, by signing the form HUD-50077, MMHA is certifying to affirmatively further fair housing. This means that the Authority will 1) examine its programs; 2) identify any impediments to fair housing choice with those programs; 3) address those impediments in a reasonable fashion in view of available resources; and 4) maintain records reflecting any action to affirmatively further fair housing.

If you have any questions regarding your Annual PHA Plan or the information in this letter, please contact Henry Paschal, Portfolio Management Specialist, at henry.paschal@hud.gov or at (216) 357-7784.

Sincerely,

Susan M. Zanghi
Division Director
Cleveland Office of Public Housing

Activity	Activity 1.o. Initial Rent Burden (HCV)
Fiscal Year	FY 2023
Program	Voucher Program (HCV)
1. Impact on the agency's finances	By waiving the maximum family share at initial occupancy of 40% of the family's monthly income, to go to 50%, there will be no impact on MMHA's HAP expenditures as families who choose to pay a higher percentage of their income towards housing costs will do so at their expense.
2. Impact on the affordability of housing costs for affected families	Applicable households paying more than 40% and up to 50% of their income towards housing costs at initial occupancy, will have their affordability affected. It impossible to know what percentage of households will be affected at this time. However, currently 4% of MMHA's voucher-assisted households pay more than 40% of their monthly adjusted income towards housing costs <u>after</u> the first year of their voucher assisted lease, and an additional 3 percent of voucher-assisted households pay more than 50%.
3. Impact on the agency's waitlist(s)	Over time, this activity is intended to enable MMHA to serve more eligible households from its waiting list enabling voucher-assisted households to move to neighborhoods of opportunity with access to education, employment and other community resources to enable them to become self-sufficient from the voucher program, thereby freeing up vouchers for eligible waiting list applicant households.
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 MMHA's voucher success rates, lease-up and HAP budget utilization rates for a small but unknown percentage of voucher holder who would otherwise not lease in opportunity neighborhoods or with their voucher in any neighborhood, but for use of this waiver.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	This activity increases MMHA's ability to meet the statutory goals of housing choice and self-sufficiency. Through this and other measures, MMHA plans to increase housing choice and opportunities and deconcentrating poverty for HCV participants in neighborhoods that have access to jobs, good schools, healthcare, a healthy environment, healthy foods, safe neighborhoods, and transportation services.
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 is expected to have no disparate impact on protected classes.

Agency Waiver: 1.u. - Standard Deductions (HCV)

Narrative. 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:

MMHA proposes replacing the expense deductions in Activity: 1.s. Elimination of Deduction(s) described above with the following standard expense deductions.

In determining adjusted income, for qualifying elderly/disabled households (described below), MMHA must deduct the following amounts from annual income. To the extent the sum exceeds three percent of annual income, the amount equal to 12 percent of a qualifying elderly/disabled household's gross annual income of record for: (i) Unreimbursed medical expenses of any elderly family or disabled family; and (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus.

The \$400 elderly/disabled household deduction will be tied to inflation and applied at triennial reexamination effective dates for each fixed-income household when the inflation adjusted elderly/disabled household deduction reaches an increase of \$25, that increased increment will be added to the deduction and applied to their gross income.

In determining adjusted income, qualifying households (described below), MMHA must deduct the following amounts from annual income. The amount equal to 15 percent of a qualifying household's gross annual income of record for any reasonable childcare expenses necessary to enable a member of the family to be employed or to further his or her education. Only include childcare expenses for children under the age of 13.

Agency goals for MTW Activity:

For medical expense deductions, MMHA's goal with this activity for all parties involved, is a simpler method to calculate tenant rent and to eliminate original and third-party documentation for two out of the three years of triennial reexaminations.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Cost neutral
Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	<p>Medical expense deductions apply to qualifying elderly/disabled households, to the extent the sum exceeds three percent of annual gross income.</p> <p>Childcare expense deductions apply to qualifying families with children under the age of 13 with any reasonable childcare expenses necessary to enable a member of the family to be employed or to further his or her education.</p> <p>The elderly/disability allowance applies if the head of household, spouse or co-head is elderly (age 62 or over) or disabled.</p> <p>Dependent deductions apply to the total number of dependents who live in the household and are under 18 years of age, have a disability, or are full-time students of any age. Include dependents who are temporarily absent from the home but listed on the lease (i.e., family members).</p>
Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	Both new admissions and currently assisted households.
Family Types. Does the MTW activity apply to all family types or only to selected family types?	Only to selected family types (described above)
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities:</p> <p>This activity applies to all tenant-based units and properties with project-based vouchers.</p>
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	Yes
Does the MTW activity require an impact analysis?	Yes

Custom Questions: Custom questions are tailored to each MTW activity.	
How much will the single standard deduction be in the Fiscal Year?	Medical Expense Deduction: The dollar equivalent of 12 percent of gross annual income used for TTP purposes for each elderly/disabled household that demonstrates and

certifies that their medical expenses exceed at least three percent of their gross income and have previously provided (or provide in the first year that this medical expense deduction is allowed), documentation of medical appointments, insurance premiums, prescriptions, and other medical bills that are out-of-pocket expenses not covered by their insurance. The 12 percent of each applicable elderly/disabled household's gross annual income in medical expenses, will be a standardized dollar amount based on each household's gross annual income of record for TTP calculation purposes. In other words, if an elderly/disabled household qualifies for a medical expense deduction (as described above) they would automatically receive the 12 percent of their annual gross income of record as the amount of their medical expense deduction, rather than a lesser or greater amount. MMHA will consider providing medical expense deductions for those households who successfully claim a hardship or grievance under the enclosed hardship policy. The dollar equivalent of 12 percent of gross annual income used for TTP purposes for **each** elderly/disabled household, is the amount above and beyond three percent of their gross income. In other words, the household pays at least three percent of their gross income towards medical expenses that are not counted as an expense deduction.

Childcare Expense Deduction: In determining adjusted income for **each** qualifying household, MMHA must deduct the following amounts from annual income. The amount equal to 15 percent of a qualifying household's gross annual income of record for any reasonable childcare expenses necessary to enable a member of the family to be employed or to further his or her education. Only include childcare expenses for children under the age of 13. MMHA will consider providing childcare expense deductions for those households who successfully claim a hardship or grievance under the enclosed hardship policy.

Activity	Impact Analysis - 1.u. - Standard Deductions (HCV)
Fiscal Year	FY 2023
Program	Voucher Program (HCV)
<p>1. Impact on the agency's finances</p>	<p>This activity is expected to reduce administrative costs and to be budget and revenue neutral in Housing Assistance Payments.</p> <p>In 2022, across all programs (regular vouchers plus special purpose vouchers) and household types, MMHA had 1,346 household transactions of which 45 percent were annual reexaminations, and 47 percent were interim recertifications.</p> <p>MMHA proposes eliminating the following standard expense deductions, to be replaced under Activity: 1.u. - Standard Deductions in each of the same types of expense deductions as described.</p> <p>In 2022, approximately 75.2 percent of voucher families leased meet the definition of applicable households for triennial reexaminations:</p> <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. <p>The replacement value of unreimbursed medical and disability expenses of any elderly family or disabled family, is based on the average for all applicable households with such expenses over the three percent threshold of each household's gross income. As such, it is designed to be budget/revenue neutral. If however, all applicable household over that threshold request a hardship and receive it, the anticipated HAP expense would be approximately \$70,523 per year or 2 percent of our 2022 HAP expenditures.</p> <p>By eliminating and replacing the elderly/disabled allowance of \$400 and replacing it with one that is worth \$400 and adjusted by inflation and then used once the inflated amount reaches an increment of \$25, the same treatment as under the Housing Opportunity Through Modernization Act of 2016 (HOTMA), will result in an increased expenditure of HAP funds of \$1 per qualifying household per month or approximately \$7,205 per year when the inflation adjusted amount is first applied, equaling 0.2 percent of our 2022 HAP expenditures.</p>

<p>2. Impact on the affordability of housing costs for affected families</p>	<p>None. The 4.3 percent of households that had medical and disability expense deductions over the replacement value, would be able to file hardship and have their documented expenses counted towards their medical and disability expense deductions.</p> <p>The medical and disability expense deduction is designed as a budget and revenue neutral measure. Specifically, to the extent the sum exceeds three percent of annual income, the amount equal to 12 percent of a qualifying elderly/disabled household's gross annual income.</p> <p>Analysis over the last three years shows that of all elderly/disabled fixed-income households, 4.3 percent have medical expense deductions above three percent of their gross income. Of the 19 percent of elderly/disabled households with medical and disability expense deductions above three percent of their income, the remaining 14.7 percent of all qualifying households will receive at least as good or better of medical and disability expense deduction than under the existing system.</p> <p>The \$400 elderly/disabled household deduction will be tied to inflation and applied at triennial reexamination effective dates for each fixed-income household when the inflation adjusted elderly/disabled household deduction reaches an increase of \$25, that increased increment will be added to the deduction and applied to their gross income.</p>
<p>3. Impact on the agency's waitlist(s)</p>	<p>None</p>
<p>4. Impact on the agency's termination rate of families</p>	<p>None</p>
<p>5. Impact on the agency's current utilization rate in the HCV program</p>	<p>None</p>
<p>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice</p>	<p>This activity increases MMHA's ability to meet the statutory goals of cost effectiveness, through a simpler method to calculate tenant rent and to eliminate original and third-party documentation for medical and disability expense deductions two out of the three years of triennial reexaminations.</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>This is the initial year of implementation. The MMHA expects a hardship rate up to 4.3%.</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>

Hardship Policy: 1.u. Standard Deductions (HCV)

Households must apply for all hardship types with the exception of automatic hardships given at the time of the triennial recertification. Hardships may last less than the timeframe listed below if a hardship time period overlaps with a triennial recertification. Approval will be for the following reasons only.

Automatic Hardships:

These hardships may be granted at the time of the triennial recertification for the following reasons.

1. A qualifying household's current gross income is at or exceeds an amount that is 10 percent less than their retrospective (prior actual 12-months) income.
2. MMHA will provide medical and disability expense deductions to those households who successfully claim a hardship or grievance. Medical and disability expenses total more than the dollar equivalent of 15 percent of a qualifying household's gross annual income used for TTP purposes for each elderly/disabled household that demonstrates and certifies that their medical expenses exceed at least three percent of their gross income and have previously provided (or provide in the first year that this medical expense deduction is allowed), documentation of medical appointments, insurance premiums, prescriptions, and other medical bills that are out-of-pocket expenses not covered by their insurance. In other words, if an elderly/disabled household claims and qualifies for a medical and disability expense deduction and provides any/all of the documentation in the categories below that exceeds 3 percent of a qualifying household's gross annual income, MMHA will provide the full amount of their **actual** medical and disability expense deduction as documented minus three percent of their gross annual income. Eligible expenses include:
 - (i) Unreimbursed medical expenses of any elderly family or disabled family; and
 - (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and

Other Hardships:

- 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.

Other circumstances: A household may request a hardship exemption for other circumstances not outlined in this policy, such as the death of a family member that impacts the family's finances. MMHA will consider these requests and appropriate remedies on a case-by-case basis and decisions will be made by a staff member at the supervisor level or higher.

Long Term Hardship:

1. Death of a household member.

Requesting A Hardship:

To request a hardship, the participant/resident must complete a Hardship Request form and attach the household's current income and proof of hardship. The form will be made available in an accessible format upon request as a reasonable accommodation. Current proof of all income for all current household members will be required. The request will be reviewed and the household notified of the approval or denial in a timely manner.

MMHA will determine whether an approved hardship exists within 30 days after the request is received. Hardship requests may be denied for the following reasons:

- Failure to provide verification for loss or reduction of benefit income
- Failure to provide verification for eligibility of benefit income
- Failure to provide verification of increased expenses
- Family is not subject to eviction, utility shut off, or wage garnishment
- Failure to provide supporting documentation related to loss of income due to death in the family

The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request does not meet the above criteria. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify. Prior to the expiration of the hardship, the household will be notified of their rent portion set at their last triennial recertification or new admission. Households may request a renewal of their hardship. The request will be treated as a new hardship request and undergo a new determination with current income.

If a household is approved for a hardship, and subsequently experiences another adverse event while still in hardship status, they may request an additional hardship. The request will be treated as a new hardship request and undergo a new determination with current income. There is no limit on the number of hardships that a household may receive. If a household is approved for a hardship, they are not required to report subsequent income increases during the period of their approved hardship.

Grievance Procedure:

If a client disagrees with a hardship determination, they will follow MMHA's informal hearing

process outlined in the Administrative Plan.

A family may request for second level review of denied hardship requests, which will be conducted by a staff member at the supervisor level or higher. The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their hardship request.

If the request does not meet MMHA hardship standards outlined above, MMHA will resume the MTW activity. If the request meets the hardship standards outlined above, the agency will continue to provide an exemption from the MTW activity until the next 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.

Exemption Period:

If MMHA 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.

- 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).
- 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).
- 150 days for loss of income due to death by head, spouse, or co-head
- 90 days for increased expenses
- 60 days for break in approval of benefit income
- 30 days for all other circumstances