

# 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:** Amended 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 this significant amendment through a specific Cohort Specific Waiver.

**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 savings 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 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 as assisting with savings accounts, 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).**

<b>1. Tenant Rent Policies</b>	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Plan to Implement in the Submission Year
q. Imputed Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
u. Standard Deductions (HCV)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Plan to Implement in the Submission Year
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
<b>3. Reexaminations</b>	
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
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
<b>6. Short-Term Assistance</b>	
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
d. Alternative PBV Selection Process (HCV)	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
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program	

Coordinating Committee (HCV)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Plan to Implement in the Submission Year
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
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**

<b>1.o. - Initial Rent Burden (HCV)</b>
<p><b>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</b></p> <p>Description:</p> <p>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.</p> <p>Agency goals for MTW Activity:</p> <p>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.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Self-sufficiency; Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Increased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of</b></p>

**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?**

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

No

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

Certain types of units only

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

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

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

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

\$

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

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

Description:

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 modifying this process and increase housing choice.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

**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	11.00	2.00	8.00	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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<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</b></p> <p>No Safe Harbor Waivers are being requested.</p>

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></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><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b></p> <p>No Agency-Specific Waivers are being requested.</p>
<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b></p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

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

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

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

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

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

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

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

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

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

I.	Evaluations.
No known evaluations.	

## Public Comment Summary

### FY 2024 PHA Plan and MTW Supplement Significant Amendment

An RAB meeting was held on 2/20/2024 at the MMHA offices at 120 W. Washington St. Suite 1-L Medina, Ohio. All RAB members: Doug McClure, Mona Smith, Stacey Marotta, Cindy Maxim, Sam Roten, Jamie Charlton and Stephanie Morris were notified of this meeting via email on 2/2/2024. Due to health issues and prior commitments no RAB members attended this meeting. All members have previously been made aware of the asset building initiative via previous RAB meetings held 1/20/2023 and 2/24/2023. All members were also notified of the public hearing to be held on 2/22/2024. The public was advised via website and required newspaper publication of the public hearing on 1/8/2024.

A public hearing was held on 2/22/2024 at the MMHA offices at 120 W. Washington St. Suite 1-L Medina, Ohio for the review of the Significant Amendment to the MTW supplement. This amendment contains a cohort specific waiver for the Asset Building Initiative. In attendance from the public was Mona Smith. Also in attendance was Gary Blake, Deputy Director and Piper Morgan, Program Manager. A final draft of the waiver was presented. Ms. Smith was pleased to see suggestions from previous discussion included in the final draft. Specifically financial coaching for participants to receive increased deposits. Miss Smith indicated that she is hopeful that the program is successful in providing some financial knowledge to families and helps to improve banking relationships and budgeting skills. She hopes families use the funds wisely and was interested to see what the data shows at the end of the 2 years.

E.	Cohort -Specific Waivers.
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<p><b>Narrative.</b> Describe the MTW activity, the MTW agency’s goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.</p>	<p><b><u>PHA Designed Asset Building Savings Account Program Summary</u></b></p> <ul style="list-style-type: none"> <li>• Randomly select seventy families to receive a savings account funded by MMHA HCV HAP dollars. These families will participate in the “program group” in an asset building savings account opportunity. MMHA has 699 vouchers currently with additional vouchers pending with HUD. The remaining families of up to 629 families are placed in the “control group”. Research team to finalize communications and coordination with both program and control group including any compensation or expectations.</li> <li>• Each family selected in Program Group will be enrolled in an automatic monthly deposit plan for two years with Westfield Bank (our community partner) - \$120 deposit initially &amp; \$20 monthly thereafter for two years to build a “rainy day”/ emergency savings account – immediately accessible for withdrawal. These accounts are 100% funded by HCV HAP dollars and paid quarterly.</li> <li>• Each of seventy families selected for the Program Group will be offered financial coaching through the local Medina/Summit County United Way (UW) Financial Empowerment Center: specifically one-on-one financial coaching (see attached). Families will have their monthly deposit raised to \$100 per month following completion of the required initial milestone for the financial coaching program. These increases will be processed at the start of the quarter following milestone completion.</li> <li>• Key measurement for financial coaching initial milestone – 3 months participation with minimum four attended appointments of UW one-on-one financial coaching. The focus will be on credit score improvement, debt reduction,</li> </ul>

	<p>increased saving, budgeting, connection to safe &amp; affordable banking.</p> <ul style="list-style-type: none"> <li>• Our Community Bank Partner WFB offers “relationship banking services” to enhance the Program Group experience including budgeting and Emergency Savings Account Education.</li> <li>• Each Program Group family selected may decline participation as desired. Also, a family that is selected in the Program Group may have their participation in the HCV Program terminated due to a programmatic action according to the MMHA HCV Admin Plan. These “terminated” families would remain in the “Program Group” and no new family would be selected.</li> </ul> <p><i>Agency goals for MTW Activity:</i></p> <p>This activity supports the goals of self-sufficiency for low-income households.</p>
<p><b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Self-sufficiency</p>
<p><b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	<p>Increased expenditures (see Cost Implications and Cost Estimate well below)</p>
<p><b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	<p>The MTW activity applies only to all assisted households; each assisted household will belong to either the “program group” or the ”control group” .</p>
<p><b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>Currently assisted households; new admissions would not be eligible.</p>

<p><b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p><b>Location.</b> 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><b>For HCV activities:</b> Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p><b>For HCV activities:</b> The MTW activity applies to all properties with tenant and/or project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>No</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>
<p>Cost Implications:</p>	<p>The cost implications for this activity are limited to the amount of MTW funding available for MTW ABC Savings Account Program. MMHA anticipates fifty Program Group families will participate in the full 24-month cycle. MMHA anticipates an additional ten families participating for less than two years due families leaving the HCV Program.</p>
<p>Cost Estimate:</p>	<p>60 families * \$120 = \$7200 – initial deposits  25 families w/ coaching completion * \$1980 = \$49500 – two-year monthly deposits  25 families w/o coaching completion * \$360 = \$ 9000 – two-year monthly deposits  10 families that end participation early * \$240 = \$2400 – miscellaneous monthly deposits  10 families are estimated to fail to enroll in the program.  Total Cost Estimate: 7200+49500+9000+2400= \$68,100.</p>

**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

**Board Resolution #24-03  
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 07/01/2023, 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 implement 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

OH027  
 PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 2023  
 \_\_\_\_\_ 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).

Name of Executive Director		Name Board Chairman	
James A. Sipos	02/28/2024	Carol Lawler	2/28/2024
Signature 	Date	Signature 	Date

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The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.