

PHA Name : Northwest Ga Housing Authority

PHA Code : GA285

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

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Northwest Georgia Housing Authority (NWGHA), established in 1937, is located in Rome Georgia. The NWGHA administers both the Public Housing and Housing Choice Voucher (HCV) programs as well as affordable housing options to all eligible households regardless of race, color, religion, sex, physical or mental handicap, familial status, national origin, or other protected class. The NWGHA is committed to providing quality, affordable housing, that enhances the lives of its tenants and promotes their independence. There are currently 669 public housing units. These units are spread throughout Rome & Rockmart, Georgia. NWGHA also offers 965 Housing Choice Vouchers for individuals to use in Floyd & Polk Counties. In addition to providing numerous amenities & services for its tenants, NWGHA operates three non-profit organizations: Appalachian Housing & Redevelopment Corporation, Three Rivers Housing & Development Corporation, and NWGHA Resident Council. The NWGHA is a designated EnVision Center, which offers HUD-assisted families access to community and supportive services that support a family's effort to become self-sufficient. Through the MTW program, NWGHA will further the EnVision mission to provide communities with centralized hubs for support in the following four pillars: Character and Leadership, Educational Advancement, Health and Wellness, and Economic Empowerment. The overall vision for the NWGHA's Moving to Work (MTW) program is to create quality housing along with supportive services for tenant self-sufficiency.

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	
i. Alternative Utility Allowance (PH)	Plan to Implement in the Submission Year
j. Alternative Utility Allowance (HCV)	Plan to Implement in the Submission Year
m. Utility Reimbursements (PH)	Plan to Implement in the Submission Year
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
b. Payment Standards- Fair Market Rents (HCV)	Plan to Implement in the Submission Year
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
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	
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	

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

1.i. - Alternative Utility Allowance (PH)
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 The NWGHA will streamline its recertifications by employing a standard utility allowance for its public housing households. This act will reduce staff hours, allowing staff to focus on other matters. Additionally, it will allow the household rent/portion to increase helping households to realize a more market rate rent.
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 revenue; Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of

assisted households?

The MTW activity applies to all assisted households

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

N/A

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

No

Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.

Utility allowances, using the standard method, are the deduction of individual utilities based on bedroom size and dwelling type from a household's Total Tenant Payment (TTP). The NWGHA will make a standardized utility allowance by averaging every utility type and then adding those averages together based on bedroom size and dwelling type. This will result in a single utility allowance amount, based on bedroom size and dwelling type, that will be deducted from a household's TTP. The NWGHA will have two standard utility allowance schedules based on bedroom size and dwelling type. The NWGHA will have one standard utility allowance schedule based on bedroom size for public housing. This new practice will reduce the administrative burden on the NWGHA's staff during recertifications.

Northwest Georgia Housing Authority
Public Housing
Bedroom Size
0 1 2 3 4 5
\$ - \$ 78 \$ 95 \$ 114 \$ 123 \$ 143

1.j. - Alternative Utility Allowance (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

Utility allowances, using the standard method, are the deduction of individual utilities based on bedroom size and dwelling type from a household's Total Tenant Payment (TTP). The NWGHA will make a standardized utility allowance by averaging every utility type and then adding those averages together based on bedroom size and dwelling type. This will result in a single utility allowance amount, based on bedroom size and dwelling type, that will be deducted from a household's TTP. The NWGHA will have two standard utility allowance schedules based on bedroom size and dwelling type (Single Family/Mobile Home AND Apartment/Duplex/High-Rise/Townhouse) for HCV. This new practice will reduce the administrative burden on the NWGHA's staff during recertifications.

Northwest Georgia Housing Authority
HCV Unit Type: Single Family & Mobile Home
Utility or Service
Bedroom Size
0 1 2 3 4 5
Heating \$ 33 \$ 40 \$ 45 \$ 52 \$ 58 \$ 61
Air Conditioning \$ 11 \$ 14 \$ 18 \$ 23 \$ 28 \$ 32
Cooking \$ 11 \$ 11 \$ 14 \$ 14 \$ 15 \$ 16
Other Electric \$ 34 \$ 36 \$ 40 \$ 45 \$ 49 \$ 57

Water Heating \$15 \$ 21 \$ 28 \$ 41 \$ 55 \$ 68
 Water \$16 \$ 19 \$ 25 \$ 38 \$ 51 \$ 64
 Sewer \$ 27 \$ 36 \$ 46 \$ 69 \$ 91 \$ 113
 Trash Collection \$18 \$18 \$18 \$18 \$18 \$18
 Refrigerator \$ 5 \$5 \$5 \$5 \$5 \$5
 Range \$4 \$4 \$4 \$4 \$4 \$4
 Other \$ 33 \$ 33 \$ 33 \$ 33 \$ 33 \$ 33
 TOTAL \$ 207 \$ 237 \$ 276 \$ 342 \$ 407 \$ 471

Northwest Georgia Housing Authority
 HCV Unit Type: Apartment, Duplex, High-Rise & Townhouse
 Utility or Service

Bedroom Size

0 1 2 3 4 5

Heating \$ 26 \$ 30 \$ 35 \$ 39 \$ 45 \$ 50
 Air Conditioning \$ 10 \$ 12 \$ 16 \$ 20 \$ 25 \$ 29
 Cooking \$ 11 \$ 11 \$ 14 \$ 14 \$ 16 \$ 16
 Other Electric \$ 34 \$ 36 \$ 40 \$ 45 \$ 49 \$ 57
 Water Heating \$ 15 \$ 21 \$ 28 \$ 41 \$ 55 \$ 68
 Water \$ 16 \$ 19 \$ 25 \$ 38 \$ 51 \$ 64
 Sewer \$ 27 \$ 36 \$ 46 \$ 69 \$ 91 \$ 113
 Trash Collection \$ 18 \$ 18 \$ 18 \$ 18 \$ 18 \$ 18
 Refrigerator \$5 \$5 \$5 \$5 \$6 \$6
 Range \$4 \$4 \$4 \$4 \$4 \$4
 Other \$ 33 \$ 33 \$ 34 \$ 38 \$ 38 \$ 39

TOTAL \$ 199 \$ 225 \$ 265 \$ 331 \$ 398 \$ 464

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 revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

N/A

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

No

Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.

Utility allowances, using the standard method, are the deduction of individual utilities based on bedroom size and dwelling type from a household's Total Tenant Payment (TTP). The NWGHA will make a standardized utility allowance by averaging every utility type and then adding those averages together based on bedroom size and dwelling type. This will result in a single utility allowance amount, based on bedroom size and dwelling type, that will be deducted from a household's TTP. The NWGHA will have two standard utility allowance schedules based on bedroom size and

dwelling type (Single Family/Mobile Home AND Apartment/Duplex/High-Rise/Townhouse) for HCV. This new practice will reduce the administrative burden on the NWGHA's staff during recertifications.

1.m. - Utility Reimbursements (PH)

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

The NWGHA will eliminate the utility reimbursements. The goal is to increase revenue for the authority while making households more self-reliant.

The NWGHA disburses \$2,429 in monthly utility reimbursements to approximately 46 public housing households, which equates to an average monthly utility reimbursement of \$53 per household. The yearly average reimbursement is \$634 per household. There are approximately 46 households that pay \$0 in rent due to their utility reimbursement. Once this activity takes effect, these households must pay at least the minimum rent of \$50 regardless of their utility allowance. The NWGHA will realize a minimum of \$2,429 in monthly cost savings, at least \$29,148 in yearly cost savings, and the NWGHA will receive an additional \$2,300 monthly (\$27,600 yearly) in rent revenue

during the first year in which this activity is implemented.

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 revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

N/A

1.n. - Utility Reimbursements (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

The NWGHA will eliminate the utility reimbursements. The goal is to increase revenue for the authority while making households more self-reliant.

The NWGHA disburses \$8,398 in monthly utility reimbursements to approximately 119 HCV households, which equates to an average monthly utility reimbursement of \$71 per household. The yearly average reimbursement is \$852 per household. There are approximately 119 households that pay \$0 towards their tenant rent portion due to their utility reimbursement. Once this activity takes effect, these households must pay at least the minimum tenant rent portion of \$50 regardless of their utility allowance. The NWGHA will realize a

minimum of \$8,398 in monthly cost savings, at least \$100,776 in yearly cost savings, and an additional \$5,950 monthly (\$71,400 yearly) in cost savings, in the form of decreased HAP, during the first year in which this activity is implemented.

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 revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

N/A

2.b. - Payment Standards- 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

The NWGHA will raise the payment standard to 120% of the Fair Market Rents (FMR). Housing choices are dwindling due to growing local market rents, and this limits where NWGHA households can live. This activity is a remedy to this concern. The current NWGHA payment standard is 110% of the FMR. A payment standard of 120% of FMR will increase the payment standard by an average of \$126 for all bedroom sizes in Floyd

County and \$99 for all bedroom sizes in Polk County.

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

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

N/A

Does 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?

No

No document is attached.

Please explain the payment standards by FMR:

The NWGHA will raise the payment standard to 120% of the Fair Market Rents (FMR). Housing choices are dwindling due to growing local market rents, and this limits where NWGHA households can live. This activity is a remedy to this concern. The current NWGHA payment standard is 110% of the FMR. A payment standard of 120% of FMR will increase the payment standard by an average of \$126 for all bedroom sizes in Floyd

County and \$99 for all bedroom sizes in Polk County.

3.a. - Alternative Reexamination Schedule for Households (PH)

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

The NWGHA will decrease the frequency of tenant reexaminations from annual to biennial for all public housing. This restructuring will allow families to have a more consistent rent portion over a longer period of time, and it will create more time for the NWGHA staff to attend to other business affairs.

Interim recertifications will be limited to one interim per year at the request of the household. If the interim is for a decrease in income, only income decreases of 10% or more will be processed.

Interim decreases will be limited to one during a calendar year and no interim decreases during the first six months after initial occupancy. Required interim recertifications for household composition changes, Family Self-Sufficiency, or landlord rent increases will not count against the limit on voluntary interim recertifications.

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
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
N/A
Does this MTW activity require a hardship policy?
Provided Already
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 two 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.
Required interim recertifications for household composition changes will not count against the limit on voluntary interim recertifications.

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
The NWGHA will decrease the frequency of tenant reexaminations from annual to biennial for all HCV households. This restructuring will allow families to have a more consistent rent portion over a longer period of time, and it will create more time for the NWGHA staff to attend to other business affairs. Interim recertifications will be limited to one interim per year at the request of the household. If the interim is for a decrease in income, only income decreases of 10% or more will be processed. Interim decreases will be limited to one during a calendar year

and no interim decreases during the first six months after initial occupancy. Required interim recertifications for household composition changes, Family Self-Sufficiency, or landlord rent increases will not count against the limit on voluntary interim recertifications.

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

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

N/A

Does this MTW activity require a hardship policy?

Provided Already

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?

Provided Already

What is the recertification schedule?

Once every two 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.

Required interim recertifications for household composition changes will not count against the limit on voluntary interim recertifications.

3.c. - Self-Certification of Assets (PH)

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

The asset self-certification ceiling will be increased from \$5,000 to \$50,000. This will lessen the regulatory responsibilities of the

NWGHA.

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

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

N/A

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

No

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

\$50,000.

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

The asset self-certification ceiling will be increased from \$5,000 to \$50,000. This will lessen the regulatory responsibilities of the

NWGHHA.

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

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

N/A

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

No

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

\$50,000.

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

To attract and incentivize qualified landlords to participate in the HCV program, the NWGHA will allow vacant units to be preinspected prior to occupancy. The pre-inspection will be conducted within 90 days of a participant occupying the unit, HQS inspection standards, as found at 24 CFR 982.401, will not be altered, and all participants will be able to request an interim inspection.

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.

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

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

N/A

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

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</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
2022	\$2,747,699	\$2,626,744	\$120,925	2030-09-30
2023	\$0	\$0	\$0	2032-09-30

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.	

MTW CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

Certifications of Compliance with Regulations: Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (01/01/2023), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Northwest Georgia Housing Authority

MTW PHA NAME

GA285

MTW PHA NUMBER/HA CODE

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

Lee Hight

NAME OF AUTHORIZED OFFICIAL

Chairperson

TITLE

Lee Hight

SIGNATURE

5-24-2023

DATE

* *Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*



Northwest Georgia Housing Authority

FY23 MTW Supplement Public Hearing

Date: Wednesday, May 24, 2023

Time: 8:30 am

Attendance: 10 people

Comments: There were no comments made at the public hearing.

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Email: hphillips@nwgha.com
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Salesperson: BRAD EASTERWOOD

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**NOTICE OF
THE PUBLIC COMMENT
PERIOD
AND SUBSEQUENT
PUBLIC HEARING
NORTHWEST GEORGIA
HOUSING AUTHORITY
FY23 MOVING TO WORK
SUPPLEMENT TO THE
ANNUAL PLAN**

The Northwest Georgia Housing Authority (NWGHA) is seeking public input on its FY23 Moving to Work (MTW) Supplement to the Annual Plan. The MTW Program is designed to (1) reduce costs and achieve greater cost effectiveness in federal expenditures, (2) increase self-sufficiency among families served, and (3) increase housing choices for low-income families. The Supplement outlines the MTW proposed activities for the period of January 1, 2023, to December 31, 2023.

The public comment period will begin **Wednesday, March 15, 2023, and end Wednesday, May 3, 2023. NWGHA will conduct a public hearing on Wednesday, May 3, 2023, at 8:30 a.m.** at 326 West 9th Street, Rome, GA 30165. The NWGHAs Board of Commissioners will receive verbal and/or written comments on the Supplement.

The MTW Supplement will be available for review beginning **Wednesday, March 15, 2023**, online at <http://www.nwgha.com> and at 326 West 9th Street, Rome, GA 30165 from 9 a.m. to 5 p.m. Monday through Friday.

Persons requiring transportation and/or special accommodations to participate in the public hearing should call the NWGHA at (706) 378-3949 before 4:30 p.m. **Friday, April 28, 2023.** If you are hearing or speech impaired, you may reach this extension by using the Georgia Relay Service at (800) 255-0056 (TTY), (800) 255-0135 (Voice), or 711. Language translation will be provided upon request.

Public participation in the process is encouraged. Attendance at the public hearing is not mandatory. All oral and/or written comments submitted by the close of the comment period will be considered. No comments will be considered after the close of the comment period.



FY23 NWGHA Impact Analysis Activity 4 **Alternative Recertification Schedule**

1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)

The NWGHA will decrease the frequency of tenant reexaminations from annual to biennial for all of its public housing and HCV households. The NWGHA predicts that this activity will produce operational cost savings, as staff are freed to manage other administrative affairs.

2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)

This activity will allow the NWGHA's households to have a more consistent rent/ tenant rent portion over a longer period of time, which will consequently make the public housing and HCV programs more affordable for families.

3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)

This activity will not affect the waiting list.

4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)

This activity will not affect the termination rate of families.

5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program

This activity will not affect the agency's current public housing occupancy level or utilization rate in the HCV program.

6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice

MTW Statutory Objective - Cost Effectiveness

This activity will decrease the administrative costs associated with processing annual and interim recertifications.

MTW Statutory Objective – Self-Sufficiency

This activity will incentivize residents and participants to increase their income, knowing they may do so without the penalty of increased rent, thus propelling them towards a more self-sustained state.

7. Impact on the agency's ability to meet the MTW statutory requirements

The NWGHA will be able to meet the statutory objective of Cost Effectiveness.

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

The NWGHA does not expect to see an increase in hardship requests as a result of this activity.

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

This activity is based on income reviews, in which protected class is not a factor, and there is no anticipated impact on protected classes.

FY23 NWGHA Impact Analysis Activity 3
Payment Standard – Fair Market Rents

1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)

Currently, the NWGHA is using a payment standard that is 110% of the Fair Market Rents (FMR) for both Floyd and Polk Counties. The NWGHA will raise the payment standard to 120% of the FMR. It is anticipated that this activity will increase the NWGHA's federal expenditures in terms of housing assistance payments (HAP). The average HAP is projected to increase by \$126 per family, per month for units in Floyd County and by \$99 per family, per month for units in Polk County. Augmenting the payment standard for FMR will expand housing choices for families and deconcentrate poverty.

2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)

Families will, similarly, see an increase in their tenant rent portion; however, it will be insubstantial. Due to increases in local market rents, all families will see an increase in rent regardless of their income status.

3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)

This activity will not affect the waiting list.

4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)

This activity will not affect the termination rate of families.

5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program

Due to an increase in HAP, this activity may affect the agency's current utilization rate in the HCV program. It is the expectation that this activity will have a neutral effect on the HCV utilization rate when combined and implemented with the other NWGHA MTW activities.

6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice

MTW Statutory Objective – Housing Choice

This activity will enlarge the pool of available and affordable housing choices from which a family can choose.

7. Impact on the agency's ability to meet the MTW statutory requirements

The NWGHA will be able to meet the statutory objective of Housing Choice.

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

The NWGHA does not expect to see an increase in hardship requests as a result of this activity.

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

This activity is based on income reviews, in which protected class is not a factor, and there is no anticipated impact on protected classes. Elderly and disabled participants are a protected class; however, this activity will not have a negative impact on them.

NORTHWEST GEORGIA HOUSING AUTHORITY HARDSHIP POLICY

The NWGHA has established a hardship policy to evaluate individual circumstances to address hardship exemption requests.

Applicable Family Situations

Qualifying hardships include the following:

1. The family has experienced a decrease in income because of changed circumstances including,
 - a. Involuntary loss or reduction of employment
 - b. Death in the family
 - c. Involuntary reduction in or loss of earnings or other assistance
2. The family has experienced an increase in expenses because of changed circumstances, for
 - a. Medical costs that exceed 25% or more of the family's current expense
 - b. Childcare costs that exceed 25% or more of the family's current expense
 - c. Involuntary loss of transportation, such as a serious car accident
 - d. Education
 - e. Similar items
 - f. Such other situations and factors determined by the NWGHA to be appropriate.

Process for Agency Review and Determination

When a client requests a hardship exemption from an MTW activity, the NWGHA will take the following actions:

1. Suspend the MTW activity beginning the next month after the request until the agency has determined if the request is warranted.
2. Determine whether a hardship exists within a reasonable time after the family request and whether it is temporary or long term.
3. The NWGHA will not evict the family during the 90-day period beginning the month following the family's request for a hardship exemption.
4. If it is determined that a financial or other hardship exists and is **TEMPORARY**, the NWGHA will continue providing an exemption from the MTW activity at a reasonable level for up to 90 days. After that time, the NWGHA will reinstate the MTW activity from the beginning of the suspension. The NWGHA will offer the family a reasonable repayment agreement, on terms and conditions established by the NWGHA for the amount of back rent owed by the family.
5. If it is determined that a financial or other hardship exists and is **LONG-TERM**, the NWGHA will continue providing an exemption from the MTW activity at a reasonable level for a specified duration determined by the NWGHA. After that time, the NWGHA will reinstate the MTW activity from the beginning of the suspension. The NWGHA will offer the family a reasonable repayment agreement on terms and conditions established by the NWGHA for the amount of back rent owed by the family.
6. If it is determined that a financial or other hardship request did not meet hardship standards, the client must resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.

Resident and Participant Notification

The NWGHA will notify families of its Hardship Policy through its Administrative Plan, Admissions and Continued Occupancy Policy (ACOP), at intake, at recertification, and when a family is to be terminated due to an MTW activity.

Grievance Procedure

If a family's hardship request is denied, the family is permitted to go before the Hearing Officer for a second review.

Reasonable Accommodations

The NWGHA will address persons with handicaps requesting a reasonable accommodation under 24 CFR part 8 through the NWGHA's Reasonable Accommodations Policy and procedures.

Record Keeping

The NWGHA will keep clear records for hardship requests and determinations for three (3) years. These records are available for public review and inspection at the NWGHA's principal office during normal business hours and supplied to HUD if requested.